

**Rockport Public Schools**

**Tiered Focused Monitoring Report**

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

**Tier Level** **2**

**Dates of Onsite Visit:** **January 7 & 8, 2021**

**Date of Final Report:** **April 20, 2021**



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Commissioner of Elementary and Secondary Education

During the 2020-2021 school year, Rockport 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 Rockport Public Schools included:

Self-Assessment Phase:

* The 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 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 district’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.
* 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. 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 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. |
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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. |

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

The review instruments, that include the regulatory requirements specific to the special education and civil rights criteria referenced in the table above, can be found at [www.doe.mass.edu/psm/resources/default.html](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:**  A review of documents and administrative and parent interviews indicated that the district has not established a parent advisory council (PAC) on special education or sought a waiver from the Department to meet this requirement in an alternative manner. Document review and administrative interviews indicated that the district conducts at least one workshop annually on the rights of students and their parents under the state and federal special education laws. |
| **LEA Outcome:**  Rockport Public Schools will document and exhaust all efforts to recruit leadership, membership and establish/revitalize a parent advisory council (PAC) on special education beginning with the 2021-2022 school year. If there is no organized PAC in place by November 19, 2021, the district will seek a waiver through DESE. |
| **Action Plan:**  Rockport Public Schools will submit an annual timeline of activities to support coordinated and ongoing member recruitment and maintenance of an established PAC. Activities will include a general PAC information night, periodic scheduled meetings with PAC leadership to support a functioning PAC, and the provision of at least one workshop annually on the rights of students and their parents and guardians under the state and federal special education laws.  By June 14, 2021, Rockport Public Schools will submit evidence of the annual workshop on the rights of students and their parents and guardians under the state and federal special education laws.    By September 30, 2021, Rockport Public Schools will submit its updated PAC bylaws and names of elected officers, along with evidence of PAC members' collaborative participation with district administration and the school committee. |
| **Success Metric:**  Rockport Public Schools' parent advisory council on special education will have elected officers in place, updated bylaws, and a calendar of scheduled meetings and planned events starting in SY 2021-2022 and beyond.  Evidence:  \* Agenda and sign-in sheet for the student and parent rights workshop  \* Updated bylaws with names of elected officers  \* Examples of collaboration between the PAC and administration on matters that pertain to the education and safety of students with disabilities, including participation in the planning, development, and evaluation of the district’s special education programming  \* Summaries/notes from meetings, agendas and school committee presentations |
| **Measurement Mechanism:**  Continuing after the completion deadline:  In partnership with the Director of Student Services, the PAC will meet no later than April 30, annually, to coordinate planning for the subsequent year to hold PAC leadership elections, review membership recruitment, draft a calendar of events, and plan other activities. All PAC activities and events will be posted on the district website.  1) The Director of Student Services will meet regularly with the PAC to ensure that the PAC is viable and fulfilling its advisory functions.  2) PAC members will regularly provide feedback to the Director of Student Services about special education programming.  3) Rockport Public Schools and the PAC will meet the needs of parents of students with disabilities by offering educational forums and ensuring ongoing communication with school officials. |
| **Completion Timeframe:** 09/30/2021 |
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| **Improvement Area 2** |
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| **Criterion:** CR 10A - Student handbooks and codes of conduct |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and administrative interviews indicated that procedures for the discipline of students with disabilities, as published in the parent and student handbook, do not address the procedural requirements applied to students not yet determined to be eligible for special education, including procedures to conduct an expedited evaluation to determine eligibility. |
| **LEA Outcome:** Rockport Public Schools will ensure that all publications (online and hardcopy student handbooks) detail the procedural requirements applied to students not yet determined to be eligible for special education consistent with 34 CFR 300.534, including procedures to conduct an expedited evaluation to determine eligibility. |
| **Action Plan:** Rockport Public Schools will review and revise the code of conduct and handbook procedures for the discipline of students with disabilities and students with Section 504 Accommodation Plans to include procedural requirements applied to students not yet determined to be eligible for special education.  By September 30, 2021, Rockport Public Schools will provide a link to the revised code of conduct/ handbooks on the district's web site.  By September 30, 2021, Rockport Public Schools will provide evidence that all staff have been informed of the change to the code of conduct and handbooks. |
| **Success Metric:** Rockport Public Schools will publicly post and make available the revised procedures for the discipline of students with disabilities and students with Section 504 Accommodation Plans. These revised procedures will also be translated for those students/families, as needed. Specific reference to the updated language will be included in the annual mandatory trainings required for all faculty and staff.  Evidence:  \*Links to updated student handbooks posted on the website (available in hardcopy, as needed)  containing the procedural requirements applied to students not yet determined to be eligible for  special education, including procedures to conduct an expedited evaluation to determine eligibility  \*Staff training agenda/memorandum to staff |
| **Measurement Mechanism:** Continuing after the completion deadline:  Rockport Public Schools will annually review all handbooks to ensure full compliance for public release and post annually no later than September 30th. |
| **Completion Timeframe:** 09/30/2021 |
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| **Improvement Area 3** |
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| **Criterion:** CR 10C - Student Discipline |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and administrative interviews indicated that the district has not developed a system for periodic review of discipline data by principals to assess the extent of the use of suspension, determine its impact on the removal and exclusion of selected student sub-groups, and make adjustments as necessary to address over-reliance on suspensions and expulsions. |
| **LEA Outcome:** Rockport Public Schools will develop a system for periodic review of discipline data by principals to assess the extent of the use of suspension, determine its impact on the removal and exclusion of selected student sub-groups, and make adjustments as necessary to address over-reliance on suspensions and expulsions. |
| **Action Plan:** Rockport Public Schools will assess current monthly practices by principals and designated building administrators to review discipline data by student sub-groups. Principals and/or their designee at each level will gather discipline data for the purpose of identifying disproportionate use of discipline related to any sub-group. Appropriate adjustments and alternate supports and services will be identified and implemented to ensure equity for all students.  By June 14, 2021, principals will meet to identify impacted student sub-groups and identify a platform to disaggregate student data to: 1) assess what the data revealed about the extent of the use of suspension in their schools; 2) determine the impact that disciplinary practices have on the removal and exclusion of selected student sub-groups; and 3) consider and implement adjustments to practice as necessary and appropriate to address over-reliance on suspensions and expulsions and the impact on one or more student sub-groups compared with others.  By September 30, 2021, Rockport Public Schools will submit examples of discipline data analyzed by sub-group, along with a narrative and action plan, as needed. |
| **Success Metric:** Rockport Public Schools will maintain monthly reports of student discipline with summarized trends and/or patterns by student sub-group who may be disproportionately impacted by suspension or exclusion. Rockport Public Schools will make appropriate adjustments and create alternate supports and services to address possible over-reliance on suspensions and expulsions.  Evidence:  \* Agendas from administrative meeting  \* Sub-groups for data tracking  \* Summaries and analysis of discipline data  \* Any adjustments to practice addressing over-reliance on suspensions and expulsions and the impact on one or more student sub-groups compared with others |
| **Measurement Mechanism:** Continuing after the completion deadline:  Principals, along with designated building team members, will meet monthly to review discipline data to assess the extent of the use of suspension, determine its impact on the removal and exclusion of selected student sub-groups, and make adjustments as necessary to address over-reliance on suspensions and expulsions. |
| **Completion Timeframe:** 09/30/2021 |
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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 and administrative interviews indicated that although the district has a written restraint prevention and behavior support policy, the policy is not fully consistent with 603 CMR 46.00. Specifically, the policy does not include methods for preventing student violence, self-injurious behavior and suicide; reporting requirements; or a procedure for the use of time-out. A review of documents and staff interviews also indicated that the district has not developed procedures for conducting periodic review of data and documentation on the district's use of restraint. |
| **LEA Outcome:** Rockport Public Schools will ensure the district's restraint prevention and behavior support policy and procedures are fully consistent with 603 CMR 46.00 and will include methods for preventing student violence, self-injurious behavior and suicide; reporting requirements; a procedure for the use of time-out; and procedures for conducting periodic review of data and documentation on the district's use of restraint. |
| **Action Plan:** Rockport Public Schools will revise the district's restraint prevention and behavior support policy and procedures to ensure full compliance with 603 CMR 46.00 for approval by the superintendent and school committee.  By June 14, 2021, Rockport Public Schools will submit the revised restraint prevention and behavior support policy and procedures for approval by the school committee and superintendent.  By September 30, 2021, Rockport Public Schools will train all staff on the approved restraint prevention and behavior support policy and procedures.  By September 30, 2021, Rockport Public Schools will provide a link to the approved restraint prevention and behavior support policy and procedures posted on the district's website.  By January 28, 2022, Rockport Public Schools will submit samples of its analysis of restraint data, along with any actions taken, as necessary. |
| **Success Metric:** Following approval by the school committee's policy sub-committee and superintendent of schools, Rockport Public Schools' restraint prevention and behavior support policy and procedures will be fully consistent with 603 CMR 46.00.  Evidence:  \*School Committee approval of revised restraint prevention and behavior support policy and procedures  \*Training materials and sign-in sheet for training of all staff on revised restraint prevention and behavior support policy and procedures  \*Link to the approved restraint prevention and behavior support policy and procedures  \*Sample provided by principals detailing physical restraint data analysis and review |
| **Measurement Mechanism:** Continuing after the completion deadline:  Principals will annually review and provide the revised restraint prevention and behavior support policy and procedures to staff and parents of enrolled students through inclusion in handbooks and hardcopy, as needed. The revised procedures will be translated for students/families, as required. All staff will be annually trained within the first month of each school year on the revised restraint prevention and behavior support policy and procedures. Principals will conduct a periodic review of data and documentation on the district's use of restraint. |
| **Completion Timeframe:** 01/28/2022 |
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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:** A review of documents and administrative interviews indicated that although the district has a curriculum review process, the district has not trained all teachers on this process to review 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. |
| **LEA Outcome:** Rockport Public Schools will ensure individual teachers participate in annual training/re-training and subsequently engage in systematic review of curriculum at all levels for purposes of identifying materials and addressing issues related to implicit bias and equity. The training will include examples of methods to supplement any materials with additional materials, so students leave lessons with context and a balanced perspective. |
| **Action Plan:** Principals will identify curriculum leaders in their respective buildings for re-orientation and training in the Washington Models for the Evaluation of Bias Content in Instructional Materials. At the building level, principals will coordinate the subsequent training of all staff in this process in coordination with their curriculum leaders.  By September 30, 2021, Rockport Public Schools will submit evidence of teacher training on the use of the Washington Model review process to support a district-wide, systematic approach to the review of all educational materials, including textbooks, videos, online resources, and teacher generated content.  By January 28, 2022, Rockport Public Schools will submit samples of curriculum review from each building level, including representative samples of the various modes of curriculum used, such as textbooks, videos, online resources, and teacher generated content. |
| **Success Metric:** Each building will annually review all new curriculum. Teachers will consistently use the Washington Model to evaluate all educational materials for evidence of implicit bias and simplistic and demeaning generalizations.  Evidence:  \*Training materials and sign-in sheets for Washington Model teacher training sessions  \*Samples of completed curriculum review sheets from the Washington Model for each grade level |
| **Measurement Mechanism:** Continuing after the completion deadline:  Building principals and/or their designees will ensure that teachers use the curriculum review process to review all instructional materials for evidence of implicit bias and simplistic and demeaning generalizations on the basis of race, color, sex, gender identity, religion, national origin and sexual orientation. Each building principal will maintain a record of annual training for new staff, as well as the re-orientation of all staff, on the use of the identified curriculum review tool. |
| **Completion Timeframe:** 01/28/2022 |
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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:** A review of documents and administrative interviews indicated that although the district has a plan to develop an institutional evaluation working group, create a data collection protocol, and provide subsequent training to ensure effective implementation of the process, the district does not currently 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:** Rockport Public Schools will ensure that all K-12 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, by implementing an ongoing system of program review and analysis of data. |
| **Action Plan:** By June 14, 2021, Rockport Public Schools' leadership team will identify/recruit individuals to participate as members of an institutional working group (Equity Committee) at each building, including principals, deans, assistant principals, nurses, guidance counselors, social workers, athletic director, and coaches. Data will be gathered at multiple points during the school year to coincide with the cycles of various activities. This data will be maintained at the building level for ongoing review, such as at the end of each sports season or following each theatrical production.  By September 30, 2021, each building committee will have developed a common system for gathering and analyzing data for evidence of trends or patterns of exclusion.  By January 28, 2022, Rockport Public Schools will submit its first data analysis regarding students' equal access to K-12 programs, athletics, and extracurricular activities (approximately 6 months of data). Evidence may include samples of additional means of outreach or changes in policies/procedures to support those under-represented and/or at-risk groups of students. |
| **Success Metric:** Based on the ongoing analysis of data, principals or their designees will ensure that all K-12 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:  \*Committee membership by school  \*Data platform, methods of data collection, and examples of ongoing data review  \*Annual report with data, analysis and action plan as may be indicated |
| **Measurement Mechanism:** Continuing after the completion deadline:  Each principal, in collaboration with their building-based working group, will review the access and participation of all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, to ensure equal access in the district's K-12 programming, including athletics and extracurricular activities. The district will compile an annual report with its data analysis and action plan as may be indicated. |
| **Completion Timeframe:** 01/28/2022 |
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