

**Franklin County Technical School**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **1**

**Date of Onsite Visit:** **June 5, 2023**

**Date of Final Report:** **November 22, 2023**

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

**Talia Higginbotham, Chairperson**

**Winnie Koko**



Jeffrey C. Riley

Commissioner of Elementary and Secondary Education

**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**TIERED FOCUSED MONITORING REPORT**

**Franklin County Technical School**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

# **TIERED FOCUSED MONITORING REPORT INTRODUCTION**

During the 2022-2023 school year, Franklin County Technical School participated in a Tiered Focused Monitoring Review (TFM) conducted by the Department’s Office of Public School Monitoring (PSM). The purpose of the Tiered Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

Each school district, charter school, vocational school, and virtual school undergoes a Tiered Focused Monitoring Review every three years. The statewide Tiered Focused Monitoring cycle is posted at <<https://www.doe.mass.edu/psm/tfm/6yrcycle.html>>.

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 Targeted Standards, employed if LEA or school level risk assessment data indicate there is a potential issue; the 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 September 20, 2022.

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

* Selected 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 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.

**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.

**Tier Level:**

The level of monitoring varies based on tier designation, aligning supports to the level of need and ensuring that districts and schools with greater needs receive appropriate supports to make sustained improvements.

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| Tier | Title | Description |
| 1 | Self-Directed Improvement | Data points indicate no concern on compliance and student outcomes. |
| 2 | Directed Improvement | No demonstrated risk in areas with close link to student outcomes. |
| 3 | Corrective Action | Areas of concern include both compliance and student outcomes. |
| 4 | Cross-unit Support and Corrective Action | Areas of concern have a profound effect on student outcomes and ongoing compliance. |

For the 2022-2023 school year, the tier assignments are based on:

* Annual drop-out rate for students with disabilities
* Five-year cohort graduation rate for students with disabilities
* Public School Monitoring compliance data from the previous review
* Problem Resolution System data, specifically findings of noncompliance
* Special education SPP/APR compliance Indicator data for Indicators 4B, 9 & 10
  + Indicator 4B: Significant discrepancy by race or ethnicity in removal of students with

IEPs greater than 10 days

* + Indicator 9: Overall disproportionate representation of racial and ethnic groups identified

as eligible for special education

* + Indicator 10: Disproportionate representation of racial and ethnic groups within specific

disability categories

* Special education SPP/APR performance Indicator data for Indicators 5 & 6
  + Indicator 5: Education Environments (6-21)
  + Indicator 6: Preschool Environments
* Significant Disproportionality data 2021-2022 & 2022-2023

Tiering adjustments may be made for districts engaged in work with the Department’s Statewide System of Support and have schools identified as requiring assistance and intervention. Tiering assignments may also be adjusted for schools and districts unable to remedy noncompliance within one year of the previous TFM review, as well as for charter schools requiring additional oversight based on conditions of their charter.

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

Following the onsite visit, the PSM team holds an informal exit meeting to summarize the review for the superintendent or charter school leader. Within approximately 20 business days of the onsite visit, the chairperson forwards the TFM Feedback Summary that includes findings from the Tiered Focused Monitoring Review to the superintendent or charter school leader.

As part of the reporting process, all districts/charter schools in Tiers 1 and 2 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 is due to the Department within 20 business days after the issuance of the Feedback Summary and is subject to the Department’s review and approval. 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. Department staff provide support and assistance to districts and charter schools on the development of a CIMP.

Once the CIMP is approved, it is issued as the Final Report.

Department staff also provide ongoing technical assistance as the school or district is implementing the approved CIMP. **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 Feedback Summary.**

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

# **TIERED FOCUSED MONITORING FINAL REPORT**

**for Franklin County Technical School**

The Massachusetts Department of Elementary and Secondary Education conducted a Tiered Focused Monitoring Review at Franklin County Technical School during the week of June 5, 2023, to evaluate the implementation of Group B 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 school.

In preparing this report, the team reviewed extensive written documentation regarding the operation of the school’s programs, together with information gathered by means of the following Department program review methods:

**Self-Assessment Phase:**

* School review of special education and civil rights documentation for required elements including document uploads.
* Upon completion of the self-assessment, the school submitted the data to the Department for review.

**On-site Verification Phase:**

* Interviews of administrative, instructional, and support staff consistent with those criteria selected for onsite verification.
* Interview of a parent advisory council (PAC) representative.
* 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 school’s implementation of special education programs, related services, and procedural requirements.
* Observations of classrooms and other facilities: The onsite team visited a sample of classrooms and other school facilities used in the delivery of programs and services to determine general levels of compliance with program requirements.

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| The Tiered Focused Monitoring 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," and “Implementation in Progress.” (Refer to the “Definition of Compliance Ratings” section of the report.) Tiered Focused Monitoring Reports do not include criteria receiving a rating of “Implemented” or “Not Applicable.” This will allow the district/school and the Department to focus their efforts on those areas requiring corrective action. Districts 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. |
| **Not Applicable** | The requirement does not apply to the school district or charter school. |

**Franklin County Technical School**

# **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 8, CR 12A, CR 16, CR 20, CR 21, CR 22, CR 23 |
| **PARTIALLY**  **IMPLEMENTED** | SE 32 | CR 10A, CR 10B, CR 10C, CR 17A, CR 24, CR 25 |
| **NOT**  **IMPLEMENTED** | None |  |
| **NOT APPLICABLE** | None |  |

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>>.

| **CONTINUOUS IMPROVEMENT AND MONITORING PLAN** |
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| **Improvement Area** **1** |
| **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 staff interviews indicated that although the school has attempted to establish a Special Education Parent Advisory Council (SEPAC) and offered regular meetings throughout the 2022-2023 school year, such efforts have not been successful, and the school does not currently have an active SEPAC. |
| **LEA Outcome:** Franklin County Technical School will establish a Special Education Parent Advisory Council (SEPAC). The school will hold meetings throughout each school year, including a workshop on the rights of students and their parents/guardians under state and federal special education laws. If Franklin County Technical School is unable to fully establish a SEPAC, the school will submit a waiver request to the Department. |
| **Action Plan:** By January 19, 2024, the school will hold the annual workshop regarding student and parent/guardian rights. The Director of Special Education will recruit members and potential officers for the SEPAC via the school’s parent newsletter, direct outreach via email and text messages, notices, and web postings.  By February 26, 2024, the school will meet with the SEPAC to develop by-laws, identify officer positions, and establish a calendar of meetings through the remainder of the school year. The meetings will include opportunities for the SEPAC to advise the school on matters that pertain to the education and safety of students with disabilities and participate in the planning, development, and evaluation of the school's special education programs.  By April 22, 2024, the school will submit evidence that the SEPAC has successfully implemented all planned activities. If the school has not been successful in establishing a SEPAC, the Director of Special Education will submit a waiver request to the Department. |
| **Success Metric:** By April 2024 and beyond, the school will have an established SEPAC that performs the required functions of the advisory group.  Evidence:   * Documentation of outreach efforts * SEPAC by-laws and list of officers * SEPAC meeting schedule, agendas, meeting materials, and sign-in sheets * Documented evidence of participation in the planning, development, and evaluation of the school's special education programs |
| **Measurement Mechanism:** Each year, the Director of Special Education and the SEPAC officers will create a yearly schedule of SEPAC meetings and events, including the annual workshop on the rights of students and their parents/guardians under state and federal special education laws. The SEPAC will meet at least quarterly to ensure that parents are provided with the opportunity to advise the school on matters that pertain to the education and safety of students with disabilities and to participate in the planning, development, and evaluation of the school's special education programs. |
| **Completion Timeframe:** 04/22/2024 |
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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 staff interviews indicated that although the student handbook contains discipline procedures for students with a disability, the procedures do not address the following requirements when the student's conduct is a manifestation of the disability:   * The student must be returned to their original placement unless the parent and school agree to a different placement; and * The Team must complete a functional behavioral assessment and behavioral intervention plan if it has not already done so, or modify any existing behavioral intervention plan, as necessary, to address the behavior.   In addition, the discipline procedures do not ensure that the parent is included in the manifestation determination process. |
| **LEA Outcome:** Franklin County Technical School will ensure that the student handbook contains the following requirements when the student's conduct is a manifestation of the disability:   * The student must be returned to their original placement unless the parent and school agree to a different placement; and * The Team must complete a functional behavioral assessment and behavioral intervention plan if it has not already done so, or modify any existing behavioral intervention plan, as necessary, to address the behavior.   In addition, the student handbook will make clear that the parent is included in the manifestation determination process. |
| **Action Plan:** By January 19, 2024, the school will update the student handbook to include the required discipline procedures when a student's conduct is a manifestation of the student's disability and make clear that the parent is included in the manifestation determination process.  By February 26, 2024, the school will obtain school committee approval of the updated student handbook and disseminate the handbook to members of the school community. In addition, the school will provide training to all relevant staff on the requirements for conducting a manifestation determination. |
| **Success Metric:** By February 2024 and beyond, the student handbook will include the required discipline procedures for students with disabilities.  Evidence:   * Updated student handbook * School committee agenda and minutes * Evidence of dissemination to school community * Staff training agenda, materials, and attendance sheets |
| **Measurement Mechanism:** Continuing after the completion due date, prior to the start of each school year, the school administration will review the student handbook to ensure compliance with the current student discipline regulations. Additionally, the handbook will be updated annually to address any required updates and disseminated to members of the school community. Relevant staff will also be trained on any updates to the discipline procedures. |
| **Completion Timeframe:** 02/26/2024 |
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| **Improvement Area 3** |
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| **Criterion:** CR 10B - Bullying Intervention and Prevention |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that the school's Bullying Intervention and Prevention Plan (Plan) does not include members of school staff in the definitions of bullying and potential aggressor. Additionally, the Plan does not recognize that certain students may be more vulnerable to become targets of bullying, harassment, or teasing based on actual or perceived characteristics, including race; color; religion; ancestry; national origin; sex; socioeconomic status; homelessness; academic status; gender identity or expression; physical appearance; pregnant or parenting status; sexual orientation; mental, physical, developmental or sensory disability; or by association with a person who has or is perceived to have one or more of these characteristics. Furthermore, the Plan does not outline the specific steps the school will take to create a safe and supportive environment for more vulnerable student populations. |
| **LEA Outcome:** Franklin County Technical School’s Bullying Intervention and Prevention Plan (Plan) will include members of school staff in the definitions of bullying and potential aggressor. Additionally, the Plan will recognize that certain students may be more vulnerable to become targets of bullying, harassment, or teasing based on actual or perceived characteristics, including race; color; religion; ancestry; national origin; sex; socioeconomic status; homelessness; academic status; gender identity or expression; physical appearance; pregnant or parenting status; sexual orientation; mental, physical, developmental or sensory disability; or by association with a person who has or is perceived to have one or more of these characteristics. Furthermore, the Plan will outline the specific steps the school will take to create a safe and supportive environment for more vulnerable student populations. |
| **Action Plan:** By January 19, 2024, the school will update the Plan to include the requirements of the current bullying regulation.  By February 26, 2024, the school will provide training to all staff and disseminate the Plan to members of the school community. |
| **Success Metric:** By February 2024 and beyond, the school will have an updated Plan that includes all requirements.  Evidence:   * Updated Plan * Agenda, training materials, attendance sheets * Evidence of dissemination |
| **Measurement Mechanism:** Continuing after the completion due date, prior to the start of each school year, school administration will review the Plan to ensure compliance with the regulations. If noncompliance is identified, the school will make corrections to the Plan and disseminate updates to the school community. Additionally, all staff will be trained on the Plan at the start of the school year. |
| **Completion Timeframe:** 02/26/2024 |
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| **Improvement Area 4** |
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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 staff interviews indicated that the school periodically reviews discipline data based on students' disability status. However, the school does not disaggregate data by other required student subgroups, including race and ethnicity, gender, socio-economic status, and English language learner status to assess the extent and impact of disciplinary actions on selected student populations so that disciplinary practices can be modified to address any discrepancies.    Additionally, the school's procedures for emergency removal do not include the principal's responsibility to make adequate provisions for the student's safety and transportation prior to an emergency removal. |
| **LEA Outcome:** When periodically reviewing discipline data, Franklin County Technical School will disaggregate data by all required student subgroups, including race, ethnicity, gender, socio-economic status, English language learner status, and disability status to assess the extent and impact of disciplinary actions and, if necessary, modify disciplinary practices to address discrepancies.  Additionally, the school will ensure the procedures for emergency removal address the principal's responsibility to make adequate provisions for the student's safety and transportation prior to emergency removal. |
| **Action Plan:** By January 19, 2023, the school will update discipline data review and emergency removal procedures to include all requirements.  By February 26, 2024, the school will provide training to all relevant staff on the updated procedures.  By April 22, 2024, the school will submit evidence of a discipline data review and analysis of any discrepancies based on required subgroups. Additionally, the school will conduct a root cause analysis and develop an action and monitoring plan to address any identified discrepancies. |
| **Success Metric:** By April 2024 and beyond, the school will periodically disaggregate discipline data by all required student subgroups and, if necessary, modify practices to address discrepancies. In addition, the school’s discipline procedures will include all required elements.  Evidence:   * Revised discipline data review and emergency removal procedures * Staff training agenda, materials, and attendance sheets * Results of discipline data review * Root cause analysis and action plan, if applicable |
| **Measurement Mechanism:** Continuing after the completion due date, prior to the start of each school year, the school administration will review discipline procedures to ensure compliance with the current regulations. The school administration will also review and disaggregate discipline data by all required student subgroups each quarter to identify discrepancies. Additionally, the school will conduct a root cause analysis and modify discipline practices to address any identified discrepancies. |
| **Completion Timeframe:** 04/22/2024 |
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| **Improvement Area 5** |
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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 staff interviews indicated that the school has not developed written physical restraint procedures that 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; * A description and explanation of the program's alternatives to physical restraint; * Methods of physical restraint in emergency circumstances; * Statement prohibiting the use of prone restraint and the circumstances when such may be permitted; * Procedure for receiving and investigating complaints relating to physical restraints; * Procedure for conducting periodic review of data and documentation on the use of physical restraint; * Procedure for implementing the reporting requirements as described in 603 CMR 46.06; and * Procedure for making oral and written notification to the parent.   Additionally, staff interviews indicated that staff were not provided with annual training regarding the restraint prevention and behavior support policy and requirements when restraint is used. Furthermore, the school has not identified staff who are authorized to serve as a school-wide resource to assist in ensuring proper administration of physical restraint and subsequently have not provided the required in-depth training on the use of physical restraint. |
| **LEA Outcome:** Franklin County Technical School will have physical restraint procedures that include all the required elements. In addition, the school will ensure that all staff are trained on the school's physical restraint prevention and behavior support policy and procedures, and staff authorized as school-wide resources in assisting and ensuring proper administration of physical restraint have been provided the required in-depth training on the use of physical restraint. |
| **Action Plan:** January 19, 2023, the school will develop written physical restraint procedures that include of all the required elements of 603 CMR 46.00.  By February 26, 2024, the school will provide training to all staff on the school's physical restraint procedures. Additionally, the school will identify the staff who serve as restraint resource and provide them with the required in-depth training. The new procedures will be disseminated to the school community. |
| **Success Metric:** By February 2024 and beyond, the school will have physical restraint procedures that are consistent with the current regulations, and all the school staff will be trained on the procedures. Additionally, the school will have a group of staff who are identified to serve as a resource for the administration of physical restraint and have received the required training.  Evidence:   * Updated physical restraint procedures * Evidence of dissemination to the school community * List of staff who serve as restraint resource * Agenda, training materials, attendance sheets * Staff training agenda, materials, and attendance sheets for all-staff training * Staff training agenda, materials, and attendance sheets for in-depth training |
| **Measurement Mechanism:** Continuing after the completion due date, school administration will review the physical restraint policy and procedures to ensure ongoing compliance with the current regulations. All staff will be trained within the first month of school on the restraint policy and procedures and, for employees hired after the school year begins, within a month of their employment. Additionally, the school will ensure that staff who serve as a resource for the administration of physical restraint are identified and provided with the required training. |
| **Completion Timeframe:** 02/26/2024 |
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| **Improvement Area 6** |
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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 staff interviews indicates that although the school has developed procedures for the review of curriculum materials at the point of adoption, the school does not ensure that individual teachers review all educational materials for simplistic and demeaning generalizations on the basis of race, color, sex, gender identity, religion, national origin, and sexual orientation. Furthermore, the school does not ensure that teachers provide balance and context for any stereotype that may be depicted in such materials. |
| **LEA Outcome:** Franklin County Technical School 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. Furthermore, teachers will use appropriate activities, discussions, and/or supplementary materials to provide balance and context for any stereotypes depicted in such materials. |
| **Action Plan:** By January 19, 2024, representatives from the Department will conduct a training for school leadership the requirements of educational material review.  By February 26, 2024, school leadership will develop and/or identify appropriate procedures and tools to support educational material review and the provision of balance and context. The school will provide training to all individual teachers and other relevant staff on the procedures and tools for educational material review.  By April 22, 2024, the school will conduct internal monitoring to determine whether all individual teachers are consistently implementing the school's material review procedures for bias and stereotypes. For any identified noncompliance, the school will conduct a root cause analysis and implement a corrective action plan, including, but not limited to, additional training and/or coaching. |
| **Success Metric:** By March 2024 and beyond, all teachers in the school will review curriculum materials for bias and stereotyping and provide balance and context for any identified biases using appropriate activities, discussions, and/or supplementary materials.  Evidence:   * Updated educational material review procedures and tools * Staff training materials, agenda, and attendance sheets * Data analysis from the internal monitoring activity * Root cause analysis and action plans, if applicable |
| **Measurement Mechanism:** Continuing after the completion due date, the school will conduct annual training for all teachers and relevant staff on the school's educational material review procedures. The school will also conduct quarterly internal monitoring and provide additional training and/or coaching to address any identified noncompliance. |
| **Completion Timeframe:** 04/22/2024 |

| **Improvement Area 7** |
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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 staff interviews indicated that the school does not evaluate all aspects of its 9-12 programs 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:** Franklin County Technical School will conduct an annual review of all aspects of its 9-12 programs 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. |
| **Action Plan:** By January 19, 2023, school leadership will develop procedures and identify tools to conduct an institutional self-evaluation. The procedures will include data review, stakeholder input, actionable root-cause analysis, action planning, and progress monitoring.  By February 26, 2024, the school will submit evidence of training staff and other stakeholders responsible for conducting the institutional self-evaluation. Additionally, the school will conduct a review of access data, including information from stakeholder surveys, student achievement data, discipline data, and participation in extracurriculars and athletics.  By April 22, 2024, school will submit a self-evaluation summary that includes the following components:   * Data analysis including achievement, discipline, and programming data; * Results and analysis of stakeholder surveys on students access to school programs; * Actionable root cause analysis; * Action plan to address any identified access gaps; and * Progress monitoring plan with timelines. |
| **Success Metric:** By April 2024 and beyond, the school will conduct an annual institutional self-evaluation and develop and implement an action plan to address any identified discrepancies.  Evidence:   * Procedures and tools for annual self-evaluation * Staff training materials, agenda, and attendance sheets * Stakeholder survey summary * Access data summary * Self-evaluation summary |
| **Measurement Mechanism:** Continuing after the completion due date, the school will annually conduct an institutional self-evaluation to ensure that all students have equal access to programming and implement changes to address any discrepancies in access. Additionally, the school will provide annual training to staff and other stakeholders responsible for conducting the institutional self-evaluation. |
| **Completion Timeframe:** 04/22/2024 |
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