

**Keefe Regional Technical School**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **1**

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

**Date of Final Report: July 28, 2023**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**TIERED FOCUSED MONITORING REPORT**

**Keefe Regional Technical School**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

# **TIERED FOCUSED MONITORING REPORT INTRODUCTION**

During the 2022-2023 school year, Keefe Regional 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/3yrcycle.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 Keefe Regional Technical School**

The Massachusetts Department of Elementary and Secondary Education conducted a Tiered Focused Monitoring Review at Keefe Regional Technical School during the week of April 3, 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 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. |

**Keefe Regional 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 32, SE 35, SE 36, SE 50, SE 51, SE 52, SE 52A, SE 54, SE 56 | CR 3, CR 7, CR 7A, CR 7B, CR 7C, CR 8, CR 10A, CR 10B, CR 12A, CR 17A, CR 20, CR 21, CR 22, CR 24 |
| **PARTIALLY**  **IMPLEMENTED** | SE 55 | CR 10C, CR 16, CR 23,  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 55 - Special education facilities and classrooms |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and facilities observation indicated that special education classrooms are not given the same priority as general education programs in the allocation of instructional spaces in order to minimize stigmatization and separation of eligible students. Specifically, four Learning Strategies classrooms and the school's substantially separate special education program are clustered in one section of the basement. Additionally, speech and language services are provided in a room that is only accessible by walking through the school library. |
| **LEA Outcome:** All special education classrooms at South Middlesex Regional Vocational Technical High School will be given the same priority as general education programs in the allocation of instructional spaces in order to minimize stigmatization and separation of eligible students. |
| **Action Plan:** By August 10, 2023, the school will submit an updated floor plan that demonstrates special education classrooms are no longer clustered and given the same priority as general education classrooms.  By September 15, 2023, the Department will conduct an onsite visit to verify the new location of the special education classrooms. |
| **Success Metric:** By the start of the 2023-2024 school year and beyond, all special education classrooms at South Middlesex Regional Vocational Technical High School will be given the same priority as general education classrooms in order to minimize stigmatization and separation of eligible students.  Evidence:   * Updated floor plans * Department verification visit |
| **Measurement Mechanism:** At least annually, the school will review facility and instructional space allocation to ensure that special education classrooms are given the same priority as general education programs. |
| **Completion Timeframe:** 09/15/2023 |
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| **Improvement Area 2** |
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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 has not developed a School-wide Education Service Plan to ensure that students who are expelled or on long-term suspension have the opportunity to receive educational services and make academic progress. |
| **LEA Outcome:** South Middlesex Regional Vocational Technical High School will develop a School-wide Education Service Plan that ensures students who are expelled or on long-term suspension have the opportunity to receive educational services and make academic progress. |
| **Action Plan:** By August 10, 2023, the school will submit the School-wide Education Service Plan.  By September 15, 2023, the school will ensure that all relevant staff are provided with training on implementation of the School-wide Education Service Plan. Additionally, the school will disseminate the new plan to the school community, including students, families, and staff members. |
| **Success Metric:** By the start of the 2023-2024 school year and beyond, the school will have a School-wide Education Service Plan in place and all relevant staff will be trained on its implementation.  Evidence:   * School-wide Education Service Plan * Training agenda and attendance sheets * Evidence of dissemination to students, families, and staff |
| **Measurement Mechanism:** Prior to the start of each school year, school administration will review the School-wide Education Service Plan with all relevant staff to ensure implementation and ongoing compliance. The School-wide Education Service Plan will be updated as necessary and the updates will be provided to members of the school community. |
| **Completion Timeframe:** 09/15/2023 |
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| **Improvement Area 3** |
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| **Criterion:** CR 16 - Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that the school recently developed a written notice for former students who have not earned their competency determination or transferred to another school to inform them of available post-secondary opportunities and to encourage them to participate in such programs. However, the school does not consistently send the notice to former students who attended within the past two years. |
| **LEA Outcome:** South Middlesex Regional Vocational Technical High School will ensure that the required notices are sent annually to former students who attended within the past two years and have not earned their competency determination or transferred to another school. |
| **Action Plan:** By August 10, 2023, the school will submit copies of annual letters sent to former students who attended within the last two years and have not earned their competency determination or transferred to another school.  By September 15, 2023, the school will develop and implement a tracking system to ensure annual notices are sent as required to former students.  By November 8, 2023, the school will conduct an administrative review of records of former students who left school within the last two years to ensure that annual notices were sent. For any noncompliance identified, the school will conduct a root cause analysis and implement corrective action. |
| **Success Metric:** By the start of the 2023-2024 school year and beyond, the school will send annual notices to all former students as required.  Evidence:   * Notices sent to former students * Tracking system * Results of student record review and corrective action, as needed |
| **Measurement Mechanism:** Continuing after the completion due date, the school will implement the tracking system and conduct an annual review of relevant student records to ensure annual notices are sent to former students who have not yet earned their competency determination. For any noncompliance identified, the school will conduct a root cause analysis and implement appropriate corrective action. |
| **Completion Timeframe:** 11/08/2023 |
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| **Improvement Area 4** |
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| **Criterion:** CR 23 - Comparability of facilities |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** See SE 55 |
| **LEA Outcome:** See SE 55 |
| **Action Plan:** See SE 55 |
| **Success Metric:** See SE 55 |
| **Measurement Mechanism:** See SE 55 |
| **Completion Timeframe:** 09/15/2023 |
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| **Improvement Area 5** |
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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 review 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:** South Middlesex Regional Vocational Technical High School will ensure that an annual review of all aspects of its 9-12 programs is conducted 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 school will also ensure that appropriate changes are made as indicated by the evaluation. |
| **Action Plan:** By August 10, 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 September 15, 2023, the school will submit evidence of training staff and other stakeholders responsible for conducting the institutional self-evaluation.  By February 6, 2024, the district will submit a self-evaluation summary that includes the following components:   * Data analysis including achievement, discipline, and programming data * Results and analysis of surveys provided to families, teachers, athletic directors, and students regarding access to the school's programs; * Actionable root cause analysis; * Action plan to address any identified access gaps; and * Progress monitoring plan with timelines. |
| **Success Metric:** By the 2023-2024 school year 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 * Training materials, agenda, and attendance sheets * 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, staff and other stakeholders responsible for conducting institutional self-evaluation will receive annual training on the evaluation procedures. |
| **Completion Timeframe:** 02/06/2024 |