

**Argosy Collegiate Charter School**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **1**

**Date of Onsite Visit:** **May 11, 2023**

**Date of Final Report:** **October 2, 2023**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**TIERED FOCUSED MONITORING REPORT**

**Argosy Collegiate Charter School**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

# **TIERED FOCUSED MONITORING REPORT INTRODUCTION**

During the 2022-2023 school year, Argosy Collegiate Charter 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**

**Argosy Collegiate Charter School**

The Massachusetts Department of Elementary and Secondary Education conducted a Tiered Focused Monitoring Review at Argosy Collegiate Charter School during the week of May 08, 2023, to evaluate the implementation of Group A 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 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.
* School review of a sample of special education student records selected across grade levels, disability categories, and levels of need.
* School review of student records related to the Indicator Data Collection for Indicators 11, 12, and 13.
* 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.
* Interviews 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.
* 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 have been met.

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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. |

**Argosy Collegiate Charter 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 1, SE 2, SE 3, SE 3A,SE 6, SE 7, SE 8, SE 9,SE 9A, 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 44, SE 45, SE 46, SE 47, SE 48, SE 49 | CR 13, CR 14, CR 18 |
| **PARTIALLY****IMPLEMENTED** | SE 10 | CR 10C |
| **NOT** **IMPLEMENTED** | None |  |
| **NOT APPLICABLE** | SE 17, SE 37, SE 38, SE 39, SE 42 |  |

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>>.

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# **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 PSM team reviewed the results of Indicator data submissions for Indicators 11, 12 and 13. The Indicator review is completed prior to the onsite visit and helps inform the scope of the onsite review. 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 school’s submissions for 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** |  |  |

| **CONTINUOUS IMPROVEMENT AND MONITORING PLAN** |
| --- |
| **Improvement Area** **1** |
| **Criterion:** SE 10 - End of school year evaluations |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of student records and staff interviews indicated that when parent consent to evaluate is received 30 to 45 school working days before the end of the school year, the school does not ensure that a Team meeting is held so as to allow for the provision of a proposed IEP or written notice of the finding of no eligibility no longer than 14 days after the end of the school year. |
| **LEA Outcome:** Argosy Collegiate Charter School will ensure that when parent consent to evaluate is received 30 to 45 school working days before the end of the school year, a Team meeting is held to allow for the provision of a proposed IEP or written notice of the finding of no eligibility no longer than 14 days after the end of the school year. |
| **Action Plan:** By October 16, 2023, the Argosy Collegiate Charter School will conduct an internal record review of student records for which signed parent consent to evaluate was received within 30 to 45 school working days before the end of the 2022-2023 school year. The school will conduct a root cause analysis for any identified noncompliance and implement corrective action, as necessary. The root cause will inform the development of procedures, training, and an internal tracking system.  By January 16, 2024, the school will develop procedures for evaluation consent received 30 to 45 school working days prior to the end of the 2023-2024 school year and beyond. The school will also develop an internal tracking system to maintain compliance. The school will train all relevant personnel on the updated procedures and the internal tracking system. By May 10, 2024, the school will submit the results of internal tracking of evaluation consents received 30 to 45 working days before the end of the 2023-2024 school year. The review will ensure that the school is on track to hold a Team meeting to allow for the provision of a proposed IEP or written notice of the finding of no eligibility no longer than 14 days after the end of the school year. For any concerns identified, the school will implement appropriate actions to ensure compliance. |
| **Success Metric:** By May 2024 and beyond, Argosy Collegiate Charter School will ensure that when parent consent to evaluate is received 30 to 45 school working days before the end of the school year, a Team meeting is held to allow for the provision of a proposed IEP or written notice of the finding of no eligibility no longer than 14 days after the end of the school year. Additionally, all staff will be trained on the implementation of the procedures and the tracking system. Evidence: * Root cause analysis and corrective actions
* Revised procedures
* Description of internal tracking system
* Training materials, agenda, and staff attendance sheets
* Results of internal tracking and additional corrective action, if necessary
 |
| **Measurement Mechanism:** Continuing after the completion due date, the Director of Student Services will implement an internal tracking system to ensure that when parent consent to evaluate is received 30 to 45 school working days before the end of the school year, the school ensures that a Team meeting is held so as to allow for the provision of a proposed IEP or written notice of the finding of no eligibility no longer than 14 days after the end of the school year. Additionally, all relevant staff will be trained annually on the required timelines. |
| **Completion Timeframe:** 05/10/2024 |
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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 a data collection system that allows for disaggregation of student discipline data by race and ethnicity, gender, socio-economic status, English language learner status, and disability status. However, the school does not consistently assess the extent and impact of disciplinary actions, such as in-school suspensions, short and long-term suspensions, expulsions, and emergency removals, on selected student populations so that disciplinary practices can be modified to address any discrepancies. Specifically, the school's student discipline data demonstrated the following: * The discipline rate for all students is approximately 29.5%, a rate significantly higher than the state rate of approximately 4.2%.
* The discipline rate for students with disabilities is approximately 37.0%, a rate significantly higher than the state rate of approximately 7.6%.
* The discipline rate for Black/African American students is approximately 34.6% and the rate for Hispanic/Latino students is approximately 39%, rates significantly higher than the school's rate for all other student racial groups of approximately 24%.
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| **LEA Outcome:** Argosy Collegiate Charter School will ensure that administrators regularly assess the extent and impact of disciplinary actions, such as in-school suspensions, short term-suspensions, expulsions, and emergency removals, on selected student populations so that disciplinary practices can be modified to address any discrepancies. Additionally, the school will ensure that the current overall rate of discipline and the disparities among identified student groups are addressed and resolved. |
| **Action Plan:** Action Plan: By October 16, 2023, Argosy Collegiate Charter School will develop and implement procedures for assessing the impacts of disciplinary actions so that disciplinary practices can be modified to address the overall discipline rate and specific student group discrepancies. Additionally, the school will provide training for appropriate staff on the procedures. By November 30, 2023, the school will conduct root cause analyses and develop action and monitoring plans to address the overall discipline rate and the identified discrepancies for the suspension of African American students, Hispanic/Latino students, and students with disabilities. By January 16, 2024, the school will conduct progress monitoring activities that include analysis of discipline data to gauge the effectiveness of the action plans. Subsequent progress updates may be required based on the results of the data analysis. |
| **Success Metric:** By March 2024 and beyond, Argosy Collegiate Charter School will ensure that discipline data is periodically reviewed, and any discrepancies are addressed through modification of disciplinary practices and staff training. The school will continuously monitor progress to ensure that modifications effectively lower the overall rate of discipline and resolve discrepancies in student groups, including African American students, Hispanic/Latino students, and students with disabilities. Evidence: * Revised procedures
* Training materials, agenda, and staff attendance sheets
* Results of data analyses
* Results of root cause analyses
* Action and progress monitoring plans
 |
| **Measurement Mechanism:** Continuing after the completion deadline, the Director of Student Services, Directors of Academic Achievement, School Principal, and Dean of Students will periodically review discipline data to address the overall discipline rate; identify any discrepancies by student groups; and implement alternative interventions to address discrepancies. Additionally, the school will provide annual training for relevant staff on student discipline requirements. Other initiatives will be implemented based on the root cause analysis, action plan, and results from ongoing progress monitoring. |
| **Completion Timeframe:** 01/16/2024 |
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