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| **MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**  **Public School Monitoring** |

##### SPECIAL EDUCATION AND CIVIL RIGHTS

##### MONITORING REVIEW

## CORRECTIVE ACTION PLAN

Lee Public Schools

Monitoring Onsite Year: 2023-2024

Program Area: Special Education and Civil Rights

All corrective action must be fully implemented and all noncompliance corrected as soon as possible and no later than one year from the issuance of the Special Education and Civil Rights Monitoring Report dated June 3, 2024.

**Mandatory One-Year Compliance Date:** **June 2, 2025**

**Summary of Required Corrective Action Plans in this Report**

| **Criterion** | **Criterion Title** | **Rating** |
| --- | --- | --- |
| SE 2 | Required and optional assessments | Partially Implemented |
| SE 9 | Timeline for determination of eligibility | Partially Implemented |
| SE 13 | Progress Reports and content | Partially Implemented |
| SE 18B | Determination of placement; provision of IEP to parent | Partially Implemented |
| CR 18 | Responsibilities of the school principal | Partially Implemented |

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| SPECIAL EDUCATION AND CIVIL RIGHTS  MONITORING REVIEW  **CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:**  SE 2 Required and optional assessments | | **Rating:**  Partially Implemented |
| **Department Findings:**  Student record reviews and interviews indicate that the district does not always conduct all required assessments for initial and re-evaluations. Specifically, evaluations do not always include an educational assessment completed by a school representative that includes a history of the student's educational progress in the general curriculum and an assessment completed by a teacher(s) with current knowledge of the student's specific abilities, attention skills, participation behaviors, communication skills, memory, and social skills. | | |
| **Description of Corrective Action:**   * The district will conduct an investigation to determine the root cause that led to non-compliance in this area. * The district will update procedures to ensure that all initial and re-evaluations include written documentation of history of the student's educational progress in the general curriculum and teacher(s) assessment of the student's current abilities, attention skills, behaviors, communication skills, memory, and social skills. These procedures will address how the district will monitor compliance with procedures. This information will be posted in the shared special education drive for easy access and reference. * The district will train all relevant staff on the district's updated procedures for documenting the history of the student's educational progress in the general curriculum and teacher(s) assessment of the student's current abilities, attention skills, behaviors, communication skills, memory and social skills. Training will include a review of legal regulations, the district's updated procedures, and the role and responsibilities of specified staff members. The training will also explain the district’s internal monitoring procedures. The training will be conducted at one of the monthly special education staff meetings led by the Director of Student Services and the Assistant Director of Student Services. Participants will sign an attendance sheet acknowledging their participation in the training and understanding of regulations, district procedures, and their responsibilities. * The Department will conduct a review of student records across all grade levels to ensure compliance with requirements to either ensure that evaluation reports include a history of the student's educational progress in the general curriculum, and an assessment completed by a teacher(s) with current knowledge of the student about the students specific abilities, attention skills, participation behaviors, communication skills, memory, and social skills or that Educational Assessment A and B forms are used to record this information. For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective action taken. | | |
| **Title/Role(s) of Responsible Persons:**  Special Education Director | | **Expected Date of Completion:**  03/29/2025 |
| **Evidence of Completion of the Corrective Action:**   * Description of the investigation and results of the root cause analysis that led to non-compliance in this area * Updated procedures, and training materials used inform staff of new procedures. * Evidence of training sessions, including employee sign-in sheets for participation and understanding of concepts * Results of the Department's review of student records and, if applicable, root cause of any noncompliance identified, and steps taken to address. | | |
| **Description of Internal Monitoring Procedures:**   * The Director of Student Services will provide training to all relevant special education staff at least annually on procedures to follow to ensure each initial or re-evaluation of a student includes the history of the student's educational progress in the general curriculum and an assessment by at least one teacher who has current knowledge of the student in the classroom. This annual training will include a review of legal requirements, the role and responsibilities of Team Chairperson(s) in this process, and district internal monitoring procedures. * The Director of Student Services will conduct quarterly internal monitoring of initial and re-evaluation assessments to ensure each student record includes written documentation of the history of the student's educational progress in the general curriculum and teacher(s) assessment of the student’s current abilities, attention skills, behaviors, communication skills, memory, and social skills. For any noncompliance identified, the district will submit a root cause analysis and implement appropriate corrective actions. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 2 Required and optional assessments | **Corrective Action Plan Status:** Approved  **Status Date:** 07/29/2024  **Correction Status:** Not Corrected | |
| By September 30, 2024, the district will submit the results of the root cause analysis and an action plan that includes an internal monitoring process.  By September 30, 2024, the district will submit procedures to ensure that all initial and re-evaluations include written documentation of a history of the student's educational progress in the general curriculum and teacher(s) assessment of the student's current abilities, attention skills, behaviors, communication skills, memory, and social skills,  By September 30, 2024, for the students identified by the Department, the district will complete educational assessments, reconvene the Teams to review the results of the evaluations, and amend or revise the IEPs, as necessary. Evidence will include the educational assessments, Meeting Invitation (N3), amendment or revised IEP, and signed meeting attendance (N3A).  By December 20, 2024, the district will submit evidence of training for all relevant staff, including general education teachers, on the district’s procedures. Evidence will include training agenda, materials, and attendance.  By February 28, 2025, the Department will conduct a review of student records across all grade levels for evidence that initial evaluations and re-evaluations include an educational assessment completed by a school representative that includes a history of the student's educational progress in the general curriculum and an assessment completed by a teacher(s) with current knowledge of the student's specific abilities, attention skills, participation behaviors, communication skills, memory, and social skills.  For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective actions. Subsequent progress reports may be required. | | |
| **Progress Report Due Date(s):**  09/30/2024  12/20/2024  02/28/2025 | | |

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| SPECIAL EDUCATION AND CIVIL RIGHTS  MONITORING REVIEW  **CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:**  SE 9 Timeline for determination of eligibility | | **Rating:**  Partially Implemented |
| **Department Findings:**  Student record reviews and interviews indicate that the district does not always determine whether the student is eligible for special education services within 45 school-working days after receipt of the parent's written consent to an initial evaluation or a re-evaluation. | | |
| **Description of Corrective Action:**   * The district will submit a description of the root cause analysis that led to non-compliance in this area. The district will also submit updated procedures to ensure that parents are provided with a proposed IEP or notification of the Team's determination that the student is not is not eligible for special education services within 45 days of the district's receipt of a signed consent for evaluations to determine initial or continued eligibility for special education services and programs. This information will be posted in the shared special education drive for easy access and reference. * The district will submit evidence that all relevant staff have participated in professional development on updated procedures for completing evaluations and scheduling IEP meetings to ensure that the district determines eligibility and provides the parent either the proposed IEP or notification that the student is not eligible within 45 school-working days of receipt of signed consent for evaluations. Training will include a review of the regulations and the district's expectations regarding setting dates for completing evaluations, scheduling IEP meetings, and providing parents with a proposed IEP. The training will also include the responsibility of Team members responsible for the district's internal monitoring procedures. The training will be conducted at one of the monthly special education staff meetings led by the Special Education Director. Participants will sign an attendance sheet acknowledging their participation in the training and understanding of regulations, district procedures, and their responsibilities. * The Department will conduct a review of student records across all grade levels to ensure compliance with the requirement to provide the parent with a proposed IEP for students found eligible, or a notice of refusal for students determined to be not eligible for special education services within 45 school-working days after receipt of the parent's written consent to an initial evaluation or a re-evaluation. For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective action taken. | | |
| **Title/Role(s) of Responsible Persons:**  Special Education Director | | **Expected Date of Completion:**  03/29/2025 |
| **Evidence of Completion of the Corrective Action:**   * Description of the investigation and results of the root cause analysis that led to non-compliance in this area * Updated procedures, and training materials used inform staff of new procedures. * Evidence of training sessions, including employee sign-in sheets for participation and understanding of concepts. * Results of the Department's review of student records and, if applicable, root cause of any noncompliance and steps taken to address findings. | | |
| **Description of Internal Monitoring Procedures:**   * The Special Education Director will provide training to all relevant special education staff at least annually on procedures to follow when the district receives signed consent for initial or re-evaluations. This annual training will include a review of legal requirements, the role and responsibilities of Team Chairperson(s) in this process, and district internal monitoring procedures. * The Special Education Director will conduct quarterly internal monitoring to ensure compliance with timelines for determining eligibility for special education services and programs. For any noncompliance identified, the district will submit a root cause analysis and implement appropriate corrective actions. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 9 Timeline for determination of eligibility | **Corrective Action Plan Status:** Approved  **Status Date:** 07/29/2024  **Correction Status:** Not Corrected | |
| **Required Elements of Progress Report(s):**  By September 30, 2024, the district will submit the results of the root cause analysis and an action plan that includes an internal monitoring process.  By September 30, 2024, the district will submit procedures that ensure that it is determining whether the student is eligible for special education services within 45 school-working days after receipt of the parent's written consent to an initial evaluation or a re-evaluation.  By December 20, 2024, the district will submit evidence of training on the district’s procedures. Evidence will include training agenda, materials, and attendance.  By February 28, 2025, the Department will conduct a review of student records across all grade levels for evidence that the district is determining whether the student is eligible for special education services within 45 school-working days after receipt of the parent's written consent to an initial evaluation or a re-evaluation.  For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective actions. Subsequent progress reports may be required. | | |
| **Progress Report Due Date(s):**  09/30/2024  12/20/2024  02/28/2025 | | |

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| **Criterion & Topic:**  SE 13 Progress Reports and content | | **Rating:**  Partially Implemented |
| **Department Findings:**  Student record reviews and interviews indicate the district does not consistently ensure that progress report information sent to parents includes written information on the student's progress toward each annual goal in the IEP. | | |
| **Description of Corrective Action:**   * The district will conduct a root cause analysis of factors that led to non-compliance in this area. * The district will also update procedures outlining requirements regarding the content of progress reports, the district’s process to review progress reports for content, and distribution process. This information will be posted in the shared special education drive for easy access and reference. * All relevant staff will participate in professional development on the district’s updated procedures for progress reporting content. Training will include a review of the regulations, the district's expectations regarding progress reporting, and staff members responsible for the district's internal monitoring procedures. The training will be conducted at one of the monthly special education staff meetings led by the Special Education Director. Participants will sign an attendance sheet acknowledging their participation in the training and understanding of regulations, district procedures, and their responsibilities. * The Department will conduct a review of student records across all grade levels to ensure compliance with progress reporting content requirements. This will allow for two cycles of progress reporting for all levels (preschool, elementary, middle, and high school). For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective action taken. | | |
| **Title/Role(s) of Responsible Persons:**  Special Education Director | | **Expected Date of Completion:**  03/29/2025 |
| **Evidence of Completion of the Corrective Action:**   * Description of the investigation and results of the root cause analysis that led to non-compliance in this area * Updated procedures, and training materials used to inform staff of new procedures. * Evidence of training sessions, including employee sign-in sheets for participation and understanding of concepts. * Results of the Department's review of student records and, if applicable, root cause of any noncompliance and steps taken to address findings. | | |
| **Description of Internal Monitoring Procedures:**   * Each year the Special Education Director will meet with Team Chairperson(s) to review district procedures for managing and monitoring the progress report process and Team Chairperson role and responsibilities in this process. The Team Chairperson will read every progress report to ensure technical accuracy, valid content, and completeness. * The Special Education Director will provide training to all relevant special education staff at least annually on progress reporting regulations, progress reporting best practices, and district internal monitoring procedures. * Additionally, the district will conduct quarterly internal monitoring to ensure compliance with progress reporting requirements. For any noncompliance identified, the district will submit a root cause analysis and implement appropriate corrective actions. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 13 Progress Reports and content | **Corrective Action Plan Status:** Approved  **Status Date:** 07/29/2024  **Correction Status:** Not Corrected | |
| **Required Elements of Progress Report(s):**  By September 30, 2024, the district will submit the results of the root cause analysis and an action plan that includes an internal monitoring process.  By September 30, 2024, the district will submit procedures to ensure progress report information sent to parents includes written information on the student's progress toward each annual goal in the IEP.  By December 20, 2024, the district will submit evidence of training on the district’s procedures. Evidence will include training agenda, materials, and attendance.  By February 28, 2025, the Department will conduct a review of student records, including those students identified during the review, across all grade levels for evidence that all progress reports sent to parents include written information on the student's progress toward each annual goal in the IEP.  For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective actions. Subsequent progress reports may be required. | | |
| **Progress Report Due Date(s):**  09/30/2024  12/20/2024  02/28/2025 | | |

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| **Criterion & Topic:**  SE 18B Determination of placement; provision of IEP to parent | | **Rating:**  Partially Implemented |
| **Department Findings:**  Student record reviews and interviews indicate that the district does not always issue a proposed IEP and proposed placement to the parent immediately following the development of the IEP. | | |
| **Description of Corrective Action:**   * The district will conduct an investigation of the root cause(s) that led to non-compliance in this area. * The district will update procedures to ensure that parents are provided with a proposed IEP immediately, within 10 days following the development of the IEP at the IEP Team meeting where the parent is given a written summary of IEP goals and service delivery grid. * This information will be posted in the shared special education drive for easy access and reference. * The district will train all relevant staff on updated procedures for issuing a proposed IEP and proposed placement to parents immediately following the development of the IEP at the Team meeting. Training will include a review of the regulations and the district's expectations regarding providing parents with a proposed IEP and placement. The training will also include the responsibility of Team members for the district's internal monitoring procedures. The training will be conducted at one of the monthly special education staff meetings led by the Special Education Director. Participants will sign an attendance sheet acknowledging their participation in the training and understanding of regulations, district procedures, and their responsibilities. * The Department will conduct a review of student records across all grade levels, including those students identified during the initial onsite record review, for evidence that parents are provided with a proposed IEP for immediately following the Team meeting. For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective action taken. | | |
| **Title/Role(s) of Responsible Persons:**  Special Education Director | | **Expected Date of Completion:**  03/29/2025 |
| **Evidence of Completion of the Corrective Action:**   * Description of the investigation and results of the root cause analysis that led to non-compliance in this area * Updated procedures, and training materials used inform staff of new procedures. * Evidence of training sessions, including employee sign-in sheets for participation and understanding of concepts. * Results of the Department's review of student records and, if applicable, root cause of any noncompliance and steps taken to address findings. | | |
| **Description of Internal Monitoring Procedures:**   * The Special Education Director will provide training to all relevant special education staff at least annually on procedures to ensure that parents are provided with a proposed IEP and proposed placement immediately following the development of the IEP. This annual training will include a review of legal requirements, the role and responsibilities of Team Chairperson(s) in this process, and district internal monitoring procedures. * The Special Education Director will conduct quarterly internal monitoring to ensure that parents are provided with a proposed IEP and proposed placement immediately following the development of the IEP. For any noncompliance identified, the district will submit a root cause analysis and implement appropriate corrective actions. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 18B Determination of placement; provision of IEP to parent | **Corrective Action Plan Status:** Approved  **Status Date:** 07/29/2024  **Correction Status:** Not Corrected | |
| **Required Elements of Progress Report(s):**  By September 30, 2024, the district will submit the results of the root cause analysis and an action plan that includes an internal monitoring process.  By September 30, 2024, the district will submit procedures to ensure it issues a proposed IEP and proposed placement to the parent immediately following the development of the IEP.  By December 20, 2024, the district will submit evidence of training on the district’s procedures. Evidence will include training agenda, materials, and attendance.  By February 28, 2025, the Department will conduct a review of student records across all grade levels for evidence that the district issues a proposed IEP and proposed placement to the parent immediately following the development of the IEP.  For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective actions. Subsequent progress reports may be required. | | |
| **Progress Report Due Date(s):**  09/30/2024  12/20/2024  02/28/2025 | | |

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| **Criterion & Topic:**  CR 18 Responsibilities of the school principal | | **Rating:**  Partially Implemented |
| **Department Findings:**  During the 2023-2024 monitoring review conducted by the Office of Language Acquisition (OLA), The Department identified the compliance issues below:   * Interviews and a review of documentation indicate that the district does not have an ESL curriculum that is integral to an effective ELE program in which ELs of all grades and proficiency levels become English proficient at a rapid pace. * Interviews, documentation, and a review of student records indicate that the district lacks the ESL staffing capacity to effectively provide essential components of an effective ELE program, such as placing students in ESL courses with peers at appropriate levels, providing time for ESL collaboration with content teachers to identify language objectives, student needs and to provide appropriate supports and scaffolds for students with low levels of proficiency in content courses, providing effective oversight and monitoring of the ELE program, and advocating for English Learners at the administrative level. * The Department conducted a review of data as a part of the evaluation of the district's ELE program. Data indicated that English learners do not demonstrate sufficient growth in English language acquisition and the ELE program needs improvement to promote and support the rapid acquisition of English language proficiency by ELs. | | |
| **Description of Corrective Action:**  Please see the district’s approved Continuous Improvement and Monitoring Plan (CIMP) approved by the Office of Language Acquisition (OLA) in April 2024. | | |
| **Title/Role(s) of Responsible Persons:**  Special Education Director/ELL Director | | **Expected Date of Completion:** 12/01/2024 |
| **Evidence of Completion of the Corrective Action:**  Please see the district’s approved Continuous Improvement and Monitoring Plan (CIMP) approved by the Office of Language Acquisition (OLA) in April 2024. | | |
| **Description of Internal Monitoring Procedures:** Please see the district’s approved Continuous Improvement and Monitoring Plan (CIMP) approved by the Office of Language Acquisition (OLA) in April 2024. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 18 Responsibilities of the school principal | **Corrective Action Plan Status:** Approved  **Status Date:** 07/29/2024  **Correction Status:** Not Corrected | |
| **Required Elements of Progress Report(s):**  Corrective action for this finding will be reviewed and approved by the Office of Language Acquisition (OLA) through the district’s Continuous Improvement Monitoring Plan (CIMP), approved by OLA in April 2024. The Office of Public School Monitoring (PSM) will maintain communication with OLA throughout the progress reporting stage to track the district’s progress towards correction of noncompliance. | | |
| **Progress Report Due Date(s):**  09/30/2024  12/20/2024 | | |