

**Hull Public Schools**

**INTEGRATED MONITORING REVIEW**

**REPORT**

**Office of Public School Monitoring**

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

**Date of Onsite Visit:** **November 19, 2024**

**Date of Report: January 10, 2025**

**Department of Elementary and Secondary Education Chairperson:**

**Talia Higginbotham**



Russell D. Johnston

Acting Commissioner of Elementary and Secondary Education

**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**INTEGRATED MONITORING REVIEW REPORT**

**Hull Public Schools**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**OFFICE OF PUBLIC SCHOOL MONITORING**

**INTEGRATED MONITORING REVIEW REPORT INTRODUCTION**

During the 2024-2025 school year, Hull Public Schools participated in an Integrated Monitoring Review (IMR) conducted by the Department of Elementary and Secondary Education’s (DESE or Department) Office of Public School Monitoring (PSM). The purpose of the Integrated Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

**Components of the Integrated Monitoring Review**



Integrated Monitoring is one of eight components of a state’s general supervision system. One aspect of Integrated Monitoring is the Integrated Monitoring Review. Each school district, charter school, vocational school, and virtual school undergoes an Integrated Monitoring Review every three years. The Department’s Office of Public School Monitoring (PSM) is responsible for conducting these reviews and works closely with offices throughout the Department including, but not limited to, the Office of Special Education Planning and Policy (SEPP), Problem Resolution System Office (PRS), and the Office of Approved Special Education Schools (OASES) to promote cohesion and collaboration across the Department’s general supervision system. As set forth in the diagram above, Integrated Monitoring Review is one of the multilayered, cohesive, and formal processes employed by the Department to examine and evaluate all LEAs’ implementation of IDEA with a particular emphasis on educational results, functional outcomes, and compliance.

The monitoring cycle is posted at [Integrated Monitoring Review Three Year Cycle](https://www.doe.mass.edu/psm/integrated/3year-cycle.docx).

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 Focused Standards, which are reviewed if the Department deems appropriate due to concerns with those particular standards. In those circumstances, the identified Focused Standards are assessed in addition to the Universal Standards.

Universal Standards and Focused Standards are aligned with the following regulations:

**Special Education (SE)**

* Selected requirements from the federal Individuals with Disabilities Education Act (IDEA), 20 U.S.C. § 1400 *et seq* and accompanying regulations at 34 CFR Part 300.
* Massachusetts General Law Chapter 71B, and the Massachusetts Special Education regulations (603 CMR 28.00).

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

* Specific 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 select state requirements under M.G.L. c. 76, § 5 and M.G.L. c. 269 §§ 17 through 19.
* Specific requirements from the Massachusetts Physical Restraint regulations (603 CMR 46.00).
* Specific requirements from the Massachusetts Student Learning Time regulations (603 CMR 27.00).
* Specific requirements from the Massachusetts Student Records regulations (603 CMR 23.00).
* Various requirements under other federal and state laws and regulations.

**Integrated Monitoring Review Process:**

**Discovery:** During the Discovery stage, the PSM chairperson analyzes data and information to prepare for the onsite visit. The chairperson also reviews documents submitted by the district/school.

**Engagement:** The Engagement stage of the Integrated Monitoring Review includes all activities conducted onsite and/or virtually through the issuance of the Integrated Monitoring Review Report. Such activities may include record review, interviews, and observations.

**Close-out:** Once the Report is issued, the Close-out stage begins for the schools and districts with any identified findings of noncompliance. The Close-out stage includes the development of the Correction Action Plan and completion of subsequent progress reports to ensure all instances of noncompliance are resolved within one year of the issuance of the Integrated Monitoring Review Report.

**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.

**Report for Integrated Monitoring Reviews:**

The Integrated Monitoring Review Report will be issued within approximately 30 days of the conclusion of the onsite visit.

**Pre-finding Corrections:**

During the Discovery and Engagement stages of the review, PSM staff may find that the district/school violated an IDEA requirement prior to the issuance of a finding in the Integrated Monitoring Review Report. In such cases, PSM staff may implement the pre-finding correction protocol. If PSM staff verify that the identified noncompliance is resolved prior to the issuance of the report, no finding is made. However, a list of any pre-finding corrections will be included in the Integrated Monitoring Review Report. More information regarding the pre-finding correction protocol can be found in the PSM procedures at < <https://www.doe.mass.edu/psm/procedures.docx>>.

**Ratings:** In the Integrated Monitoring Review Report, the onsite team gives a rating for each compliance criterion it has reviewed; those ratings are “Commendable,” “Implemented,” “Implementation in Progress,” “Partially Implemented,” “Not Implemented,” “Not Applicable,” and “Prior Noncompliance - Corrective Action Under Review.”

The onsite team includes a comment in the Integrated Monitoring Review Report for each criterion that it rates “Commendable,” “Partially Implemented,” “Not Implemented,” or “Prior Noncompliance - Corrective Action Under Review,” explaining the basis for the rating.

**Corrective Action:** Where criteria are found “Partially Implemented” or “Not Implemented,” a corrective action plan (CAP) is developed to bring those areas into compliance with the relevant statutes and regulations. Department staff work with districts and charter schools on the development of an appropriate CAP.

PSM staff also provide ongoing technical assistance as the school or district is implementing the approved CAP. **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 Final Monitoring Report.**

Where criteria are rated “Prior Noncompliance - Corrective Action Under Review,” the district/charter school will work with staff from the specific Department office that identified the noncompliance to develop a corrective action plan.

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

**INTEGRATED MONITORING REVIEW DETAILS**

**for** **Hull Public Schools**

The Massachusetts Department of Elementary and Secondary Education conducted an Integrated Monitoring Review in Hull Public Schools during the week of November 18, 2024, 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 district.

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

**District Civil Rights Self-Assessment Phase:**

* Review of civil rights documentation for required elements including document uploads.
* Upon completion, the civil rights self-assessment was submitted to the Department for review.

**Engagement Phase:**

* Interviews of administrative, instructional, and support staff consistent with those criteria selected for onsite verification.
* Interviews of special education parent advisory council (SEPAC) 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 district’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 Integrated Monitoring Review 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," “Implementation in Progress”, and “Prior Noncompliance - Corrective Action Under Review.” (Refer to the “Definition of Compliance Ratings” section of the report.) 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/schools 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. |
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| **Prior Noncompliance - Corrective Action Under Review** | A finding of noncompliance was made by another office in the Department and the school/district is currently undergoing corrective action activities. | |
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| **Not Applicable** | | The requirement does not apply to the school district or charter school. |

**Hull Public Schools**

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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|  | **Universal Standards Special Education** | **Universal Standards Civil Rights and Other General Education Requirements** |
| **IMPLEMENTED** | SE 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 10B, CR 12A, CR 16,  CR 17A, CR 20, CR 21, CR 22,  CR 23, CR 25 |
| **PARTIALLY**  **IMPLEMENTED** | SE 15, SE 32 | CR 10A, CR 10C, CR 24 |
| **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>>.

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| |  | | --- | | **SPECIAL EDUCATION**  **LEGAL STANDARDS,**  **COMPLIANCE RATINGS AND**  **FINDINGS** | |

| **CRITERION**  **NUMBER** | SPECIAL EDUCATION **II. STUDENT IDENTIFICATION AND PLACEMENT** | | | |
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|  | **Legal Standard** | | | |
| **SE 15** | Outreach by the School District (Student Find)  The district has annual or more frequent outreach and continuous liaison with those groups below from which promotion or transfer of students in need of special education may be expected, or which would include students in need of special education:   1. professionals in community 2. private nursery schools 3. day care facilities 4. group homes 5. parent organizations 6. clinical /health care agencies 7. early intervention programs 8. private/parochial schools 9. other agencies/organizations 10. the school or schools that are part of the district, including Horace Mann charter schools 11. agencies serving migrant and/or homeless persons pursuant to the McKinney-Vento Education Act for Homeless Students | | | |
|  | State Requirements | | Federal Requirements | |
|  |  | | 34 CFR 300.111; 300.131; 300.209 | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of documents and staff interviews indicated that although the district conducts annual or more frequent outreach to agencies within the district where promotion or transfer of students in need of special education may be expected, the district does not have established written procedures for doing so.* |

| **CRITERION**  **NUMBER** |  | | | |
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|  | **Legal Standard** | | | |
| **SE 32** | Parent advisory council for special education   1. The school district has established a district-wide parent advisory council on special education. 2. Membership on the council is offered to all parents of students with disabilities and other interested parties. 3. The parent advisory council duties include but are not limited to: advising the district on matters that pertain to the education and safety of students with disabilities; meeting regularly with school officials to participate in the planning, development, and evaluation of the school district's special education programs. 4. The parent advisory council has established by-laws regarding officers and operational procedures. 5. The parent advisory council receives assistance from the school committee without charge, upon reasonable notice, and subject to the availability of staff and resources. 6. The school district conducts, in cooperation with the parent advisory council, at least one workshop annually within the district on the rights of students and their parents and guardians under the state and federal special education laws. | | | |
|  | State Requirements | | Federal Requirements | |
|  | M.G.L. c. 71B, § 3;  603 CMR 28.03(1)(a)(4); 28.07(4) | |  | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of documents and staff interviews indicated that the SEPAC is not involved in the planning, development, and evaluation of the district’s special education programs or advising the district on matters that pertain to the education and safety of students with disabilities.* |

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| |  | | --- | | **CIVIL RIGHTS**  **METHODS OF ADMINISTRATION (CR)**  **AND**  **OTHER RELATED GENERAL EDUCATION REQUIREMENTS**  **LEGAL STANDARDS,**  **COMPLIANCE RATINGS AND**  **FINDINGS** | |

| **CRITERION**  **NUMBER** | CIVIL RIGHTS METHODS OF ADMINISTRATION (CR)AND OTHER RELATED GENERAL EDUCATION REQUIREMENTS **V. STUDENT SUPPORT SERVICES** | | | |
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|  | **Legal Standard** | | | |
| **CR 10A** | Student handbooks and codes of conduct   1. The superintendent of every school district shall publish the district's policies pertaining to the conduct of teachers and students that:    1. prohibit the use of any tobacco products within the school buildings, the school facilities or on the school grounds or on school buses by any individual, including school personnel;    2. restrict operators of school buses and personal motor vehicles, including students, faculty, staff and visitors, from idling such vehicles on school grounds;    3. prohibit bullying as defined in section 37O and shall include an age-appropriate summary of the student-related sections of the bullying prevention and intervention plan required by said section 37O;    4. include a nondiscrimination policy that is consistent with M.G.L. c. 76, s. 5, and affirms the school's non-tolerance for harassment or discrimination, including that based upon race, color, sex, gender identity, religion, national origin or sexual orientation.    5. include the school's procedure for accepting, investigating and resolving complaints alleging discrimination or harassment; and    6. state the disciplinary measures that the school may impose if it determines that harassment or discrimination has occurred. 2. The district's code of conduct for students shall contain the following:    1. Procedures ensuring due process in disciplinary proceedings, including:       1. standards and procedures for suspension and expulsion of students;       2. procedures for the discipline of students with disabilities in accordance with IDEA and Section 504;       3. standards and procedures to assure school building security and safety of students and school personnel; and       4. the disciplinary measures to be taken in cases involving the possession or use of illegal substances or weapons, the use of force, vandalism, or violation of a student's civil rights.    2. Procedures enduring students are re-engaged in learning, including:       1. A requirement that any principal, headmaster, superintendent, or person acting as a decision-maker at a student meeting or hearing, when deciding consequences for the student, shall consider ways to reengage the student in the learning process; and shall not suspend or expel a student until alternative remedies have been employed and their use and results documented, following and in direct response to a specific incident or incidents, unless specific reasons are documented as to why such alternative remedies are unsuitable or counter-productive, and in cases where the student's continued presence in school would pose a specific, documentable concern about the infliction of serious bodily injury or other serious harm upon another person while in school.       2. A list of alternative remedies which may include but shall not be limited to: (i) mediation; (ii) conflict resolution; (iii) restorative justice; and (iv) collaborative problem solving. The principal, headmaster, superintendent, or person acting as a decision-maker shall also implement school- or district-wide models to re-engage students in the learning process which shall include but not be limited to: (i) positive behavioral interventions and supports models and (ii) trauma sensitive learning models; provided, however, that school- or district-wide models shall not be considered a direct response to a specific incident. 3. The principal of every school containing grades 9-12, in consultation with the school council, prepares a student handbook and distributes it to all students, parents, and school personnel annually; the school council reviews and revises the student code of conduct every spring to consider changes in disciplinary policy to take effect in September of the following school year, but may consider policy changes at any time. 4. The district's policies pertaining to the conduct of teachers contains relevant sections of the Bullying Prevention and Intervention Plan relating to the duties of faculty and staff and relevant sections addressing the bullying of students by a school staff member. | | | |
|  | Section 504; M.G.L. c. 71, § 37H; M.G.L. c. 71, § 37H 3/4; 603 CMR 53.00; 603 CMR 26.08 as amended by Chapter 199 of the Acts of 2011; M.G.L. c.71, s.37H3/4(b), as amended; M.G.L. c. 71 s.37O | | | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of documents and staff interviews indicated that the elementary level code of conduct does not include school-wide models to re-engage students in the learning process, including positive behavioral interventions and supports models and trauma sensitive learning models.*  *Additionally, both the elementary and high school codes of conduct are missing the following:*   * *The principal's requirement to ensure adequate provision for the student's safety and transportation prior to an emergency removal; and* * *Discipline procedures for students not yet determined eligible for special education.* |

| **CRITERION**  **NUMBER** |  | | | |
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|  | **Legal Standard** | | | |
| CR 10C | Student Discipline  Each school committee and board of trustees shall ensure that policies and procedures are in place in public preschool, elementary, and secondary schools and programs under its jurisdiction that meet, at a minimum, the requirements of M.G.L. c. 71, section 37H, section 37H 1/2, section 37H 3/4, section 37H3/4(b) as amended, M.G.L. c. 76, section 21, and 603 CMR 53.00.  These policies and procedures must address or establish, but are not limited to:   1. District-wide or school-wide model to reengage students in learning; 2. Procedures for alternative remedies for each incident such as mediation, conflict resolution, restorative justice and collaborative problem solving; 3. Procedures for documenting the use and results of alternative remedies for each incident; 4. Procedures for documenting why an alternative remedy is unsuitable or counter-productive; 5. The notice of suspension and hearing; 6. Procedures for emergency removal; 7. Procedures for principal hearings for both short and long-term suspension; 8. Procedures for in-school suspension; 9. Procedures for superintendent hearing; 10. Procedures for education services and academic progress (School-wide Education Service Plan); 11. A system for periodic review of discipline data by special populations; 12. Alternatives to suspension. | | | |
|  | M.G.L. c. 71, section 37H 3/4; M.G.L. c. 76, section 21; M.G.L. c. 71, section 37H 1/2; M.G.L. c. 71, section 37H; 603 CMR 53.00 | | | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of documents of documents and staff interviews indicated that the procedures for the superintendent's hearing do not include the following requirements:*   * *The right of the superintendent to deny or to allow an appeal at his/her discretion if the notice of appeal is not timely;* * *The right of the student or the parent to request an extension for filing the written notice of appeal for up to seven additional calendar days; and* * *The superintendent's responsibility to inform all parties before the hearing that an audio recording will be made of the hearing.*   *Please see CR 10A for concerns regarding the district's procedures for emergency removal.* |

| **CRITERION**  **NUMBER** | CIVIL RIGHTS METHODS OF ADMINISTRATION (CR) **AND OTHER RELATED GENERAL EDUCATION REQUIREMENTS**  **VIII. PROGRAM PLAN AND EVALUATION** | | | |
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|  | **Legal Standard** | | | |
| **CR 24** | Curriculum review  The district ensures that individual teachers in the district review all educational and instructional materials for simplistic and demeaning generalizations, lacking intellectual merit, on the basis of race, color, sex, gender identity, religion, national origin and sexual orientation. Appropriate activities, discussions and/or supplementary materials are used to provide balance and context for any such stereotypes depicted in such materials. | | | |
|  | 603 CMR 26.05(2) | | | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of documents and staff interviews indicated that although the district has developed procedures for educational material review, the district 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 district does not ensure that teachers use appropriate activities, discussions, and/or supplementary materials to provide balance and context for any such stereotypes that may be depicted in such materials.* |

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| This Integrated Monitoring Review Final Report is also available at:  <https://www.doe.mass.edu/psm/tfm/reports/>.  Profile information supplied by each charter school and school district, including information for individual schools within districts, is available at  <http://profiles.doe.mass.edu/>. |

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| WBMS Final Report | |
| File Name: | Hull IMR Report |
| Last Revised on: | **1/10/2025** |
| Prepared by: | **TH, JK, AP** |