

**Watertown Public Schools**

**INTEGRATED MONITORING**

**REVIEW REPORT**

**Office of Public School Monitoring**

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

**Dates of Onsite Visit:** **January 23-24, 2025**

**Date of Report: April 1, 2025**

**Action Plan Due: May 6, 2025**

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

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

# **INTEGRATED MONITORING REVIEW REPORT**

**Watertown 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, Watertown 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.

**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 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** **Watertown Public Schools**

The Massachusetts Department of Elementary and Secondary Education conducted an Integrated Monitoring Review in Watertown Public Schools during the week of January 20, 2025, 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 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.

**Discovery Phase:**

* District review of student records related to the Indicator Data Collection for Indicators 11, 12, and 13.
* Upon completion, the results of the Indicator Data Collection for Indicators 11, 12, and 13 were submitted to the Department for review.
* Review of key data points focused on educational results and functional outcomes. For more details regarding the data review, please see the PSM procedures at <https://www.doe.mass.edu/psm/procedures.docx>.

**Engagement Phase:**

* Interviews of administrative, instructional, and support staff consistent with those criteria selected for onsite verification.
* Interview of a 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.
* Review of student records for special education: The Department selected a sample of student records from those the district 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.

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 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. |
|  | | |
| **Implemented** | | The requirement is substantially met in all important aspects. |
|  | | |
| **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. |
|  | | |
| **Partially Implemented** | | The requirement, in one or several important aspects, is not entirely met. |
|  | | |
| **Not Implemented** | | The requirement is totally or substantially not met. |
|  | | |
| **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. | |
|  | | |
| **Not Applicable** | | The requirement does not apply to the school district or charter school. |

**Watertown Public Schools**

# **SUMMARY OF COMPLIANCE CRITERIA RATINGS**

|  |  |  |
| --- | --- | --- |
|  | **Universal Standards Special Education** | **Universal Standards Civil Rights and Other General Education Requirements** |
| **IMPLEMENTED** | SE 3A, SE 5, SE 6, SE 8, SE 9A, SE 10, SE 11, SE 12, SE 13, SE 14, SE 17,  SE 18A, SE 19, SE 20, SE 22, SE 25, SE 26, SE 34, SE 35, SE 37, SE 38,  SE 39, SE 40, SE 41, SE 43, SE 44,  SE 45, SE 46, SE 47, SE 48, SE 49 | CR 14 |
| **PARTIALLY**  **IMPLEMENTED** | SE 1, SE 2, SE 3, SE 7, SE 9,  SE 18B, SE 29, SE 42 | CR 18 |
| **NOT**  **IMPLEMENTED** | None |  |
| **NOT**  **APPLICABLE** | None |  |
| **PRIOR NONCOMPLIANCE:**  **Corrective Action**  **Under Review** |  | CR 13 |

# **SUMMARY OF PRE-FINDING CORRECTIONS**

The pre-finding correction protocol was implemented prior to the issuance of the Integrated Monitoring Report and all instances of noncompliance were resolved by the district for specific criteria. Evidence of correction was reviewed and verified by the Department for the following criteria:

**SE 40:** Instructional grouping requirements for students aged five and older

**SE 41:** Age span requirements

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>>.

# **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 Department’s analysis regarding 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 |  |  |

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

| **CRITERION**  **NUMBER** | **SPECIAL EDUCATION**  **I. ASSESSMENT OF STUDENTS** | | | |
| --- | --- | --- | --- | --- |
|  | **Legal Standard** | | | |
| **SE 1** | Assessments are appropriately selected and interpreted for students referred for evaluation   1. Tests and other evaluation materials are:    1. validated;    2. administered and interpreted by trained individuals;    3. tailored to assess specific areas of educational need and related developmental needs;    4. selected and administered to reflect aptitude and achievement levels and related developmental needs;    5. as free as possible from cultural and linguistic bias;    6. provided and administered in the language and form most likely to yield accurate information on what the student knows and can do academically, developmentally, and functionally;    7. not the sole criterion for determining an appropriate educational program;    8. not only those designed to provide a single general intelligence quotient;    9. are selected and administered to ensure that when a test is administered to a student with impaired sensory, manual, or speaking skills, the test results accurately reflect the student's aptitude or achievement level or the other factors the test purports to measure;    10. technically sound instruments that may assess the relative contribution of cognitive and behavioral factors, in addition to physical or developmental factors. 2. In interpreting evaluation data and making decisions, the district:    1. uses information from a variety of sources to gather relevant functional and developmental information, including information provided by the parent;    2. ensures that information obtained from these sources is considered;    3. ensures that the placement decision conforms with placement in the least restrictive environment;    4. includes information related to enabling the student to be involved in and progress in the general curriculum. | | | |
|  | State Requirements | | Federal Requirements | |
|  | 603 CMR 28.04  603 CMR 28.05 | |  | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of student records and staff interviews indicated that tests and other evaluation materials are not always provided and administered in the language most likely to yield accurate information on what the student knows and can do academically, developmentally, and functionally. Specifically, when a student is evaluated, whose primary language is not English and the student has not attained English proficiency, the district does not always conduct the evaluation in the student's primary language or provide interpreters if the evaluation is conducted in English to ensure accuracy of the results.* |

| **CRITERION**  **NUMBER** |  | | | |
| --- | --- | --- | --- | --- |
|  | **Legal Standard** | | | |
| **SE 2** | Required and optional assessments   1. Required assessments: The following assessments are completed by appropriately credentialed and trained specialists for each referred student:    1. Assessment(s) in all areas related to the suspected disability(ies) including consideration of any needed assistive technology devices and services and/or instruction in Braille.    2. Educational assessment by a representative of the school district, including a history of the student’s educational progress in the general curriculum.    3. Assessment by a teacher(s) with current knowledge of the student’s specific abilities in relation to learning standards of the Massachusetts Curriculum Frameworks and the district's general education curriculum, as well as an assessment of the student's attention skills, participation behaviors, communication skills, memory, and social relations with groups, peers, and adults.    4. For a student being assessed to determine eligibility for services at age three (3), an observation of the student's interactions in the student's natural environment or early intervention program is strongly encouraged together with the use of current assessments from Early Intervention Teams to avoid duplicate testing. 2. Optional assessments: The administrator of special education may recommend or the parent may request one or more of the following:    1. A comprehensive health assessment by a physician that identifies medical problems or constraints that may affect the student's education. The school nurse may add additional relevant health information from the student's school health records.    2. A psychological assessment by a licensed school psychologist, certified psychologist, or certified educational psychologist, including an individual psychological examination.    3. A home assessment that may be conducted by a nurse, psychologist, social worker, guidance or adjustment counselor, or teacher and includes information on pertinent family history and home situation and may include a home visit, with the agreement of the parent. 3. At the re-evaluation of a student, if no additional assessments are needed to determine whether the student continues to be eligible for special education, the school district recommends to the student's parents the following:    1. that no further assessments are needed and the reasons for this; and    2. the right of such parents to request an assessment. | | | |
|  | **State Requirements** | | **Federal Requirements** | |
|  | 603 CMR 28.04 (1) and (2) | | 34 CFR 300.304; 300.305;  300.324(a)(2)(v) | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of student records and staff interviews indicated 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 (Educational Assessment A).* |

| **CRITERION**  **NUMBER** |  | | | |
| --- | --- | --- | --- | --- |
|  | **Legal Standard** | | | |
| **SE 3** | Special requirements for determination of specific learning disability  When a student suspected of having a specific learning disability is evaluated, the Team creates a written determination as to whether or not he or she has a specific learning disability, which is signed by all members of the Team, or if there is disagreement as to the determination, one or more Team members document their disagreement. | | | |
|  | State Requirements | | Federal Requirements | |
|  |  | | 34 CFR 300.8(c)(10); 300.311 | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of student records and staff interviews indicated that when a student suspected of having a specific learning disability is evaluated, the Team does not always create a written determination as to whether or not the student has a specific learning disability, which is signed by all members of the Team, or if there is disagreement as to the determination, one or more Team members document their disagreement.* |

| **CRITERION**  **NUMBER** |  | | | |
| --- | --- | --- | --- | --- |
|  | **Legal Standard** | | | |
| **SE 7** | Transfer of parental rights at age of majority and student participation and consent at the age of majority   1. At least one year prior to the student reaching age 18, the district informs the student and the parent/guardian of the rights that will transfer from the parent/guardian to the student upon the student's 18th birthday. The notification provided to both the student and the parent/guardian must explicitly state that all rights accorded to parents under special education law will transfer to the 18 year old. 2. Upon reaching the age of 18, the school district implements procedures to obtain consent from the student with decision-making authority to continue the student's special education program. 3. The district continues to send the parent written notices and the parent will have the right to inspect the student's records, but the parent will no longer have decision-making authority, except as provided below:    1. If the parent has sought and received guardianship from a court of competent jurisdiction, then the parent retains full decision-making authority. The parent does not have authority to override any decision or lack of decision made by the student who has reached the age of majority unless the parent has sought or received guardianship or other legal authority from a court of competent jurisdiction.    2. The student, upon reaching the age of majority and in the absence of any court actions to the contrary, may choose to share decision-making with his or her parent (or other willing adult), including allowing the parent to co-sign the IEP. Such choice is made in the presence of the Team and is documented in written form. The student's choice prevails at any time that a disagreement occurs between the adult student and the parent or other adult with whom the student has shared decision-making.    3. The student, upon reaching the age of majority and in the absence of any court actions to the contrary, may choose to delegate continued decision-making to his or her parent, or other willing adult. Such choice is made in the presence of at least one representative of the school district and one other witness and is documented in written form and maintained in the student record. | | | |
|  | State Requirements | | Federal Requirements | |
|  | 603 CMR 28.07(5) | | 34 CFR 300. 320(c), 300.520 | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of student records and staff interviews indicated that at least one year prior to the student reaching age 18, the district does not always inform the student and the parent/guardian of the rights that will transfer from the parent/guardian to the student upon the student's 18th birthday. In addition, upon reaching the age of 18, the district does not always obtain consent from the student with decision-making authority to continue the student's special education program.* |

| **CRITERION**  **NUMBER** |  | | | |
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|  | **Legal Standard** | | | |
| SE 9 | Timeline for determination of eligibility  Within 45 school working days after receipt of the parent's written consent to an initial evaluation or a re‑evaluation, the school district determines whether the student is eligible for special education. | | | |
|  | State Requirements | | Federal Requirements | |
|  | 603 CMR 28.05(1); 28.06(2)(e) | |  | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of student records and staff interviews indicated that within 45 school working days after receipt of the parent's written consent to an initial evaluation or re-evaluation, the district does not always determine whether the student is eligible for special education and provide the parent with a proposed IEP.* |

| **CRITERION**  **NUMBER** |  | | | |
| --- | --- | --- | --- | --- |
|  | **Legal Standard** | | | |
| SE 18B | Determination of placement; provision of IEP to parent   1. At the Team meeting, after the IEP has been fully developed, the Team determines the appropriate placement to deliver the services on the student's IEP. 2. Unless the student's IEP requires some other arrangement, the student is educated in the school that he or she would attend if the student did not require special education. 3. The decision regarding placement is based on the IEP, including the types of related services that are to be provided to the student, the type of settings in which those services are to be provided, the types of service providers, and the location at which the services are to be provided. 4. Reserved. 5. Immediately following the development of the IEP, the district provides the parent with two (2) copies of the proposed IEP and proposed placement along with the required notice, except that the proposal of placement may be delayed according to the provisions of 603 CMR 28.06(2)(e) in a limited number of cases. | | | |
|  | State Requirements | | Federal Requirements | |
|  | 603 CMR 28.05(6) and (7); 28.06(2) | | 34 CFR 300.116; 300.325 | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of student records and staff interviews indicated that the district does not always provide the parent with a proposed IEP and proposed placement along with the required notice immediately following the development of the IEP.* |

| **CRITERION**  **NUMBER** |  | | | |
| --- | --- | --- | --- | --- |
|  | **Legal Standard** | | | |
| **SE 19** | Extended evaluation  If the Team finds the evaluation information insufficient to develop an IEP, the Team, with parental consent, may agree to an extended evaluation period.   1. The extended evaluation period is not used to deny programs or services determined to be necessary by the Team. If, prior to the extended evaluation, the Team determines that sufficient information is available to determine, in part, necessary annual goals and services, the Team writes a partial IEP that, if accepted by the parent, is immediately implemented by the district while the extended evaluation is occurring. 2. The extended evaluation period is not used to allow additional time to complete the required assessments. 3. If the parent consents to an extended evaluation, the Team documents its findings and determines what evaluation time period is necessary and the types of information needed to develop an IEP. The Team may decide to meet at intervals during the extended evaluation, but in all cases reconvenes promptly to develop an IEP when the evaluation is complete. 4. The extended evaluation may extend longer than one week but does not exceed eight school weeks. 5. The extended evaluation is not considered a placement. | | | |
|  | State Requirements | | Federal Requirements | |
|  | 603 CMR 28.05(2)(b) | |  | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *There are no issues identified for this criterion* |

| **CRITERION**  **NUMBER** |  | | | |
| --- | --- | --- | --- | --- |
|  | **Legal Standard** | | | |
| **SE 29** | Communications are in English and primary language of home   1. Communications with parents are in simple and commonly understood words and are in both English and the primary language of the home if such primary language is other than English. Any interpreter used in fulfilling these requirements is fluent in the primary language of the home and familiar with special education procedures, programs, and services. If the parents or the student are unable to read in any language or are blind or deaf, communications required by these regulations are made orally in English with the use of a foreign language interpreter, in Braille, in sign language, via TTY, or in writing, whichever is appropriate, and all such communications are documented. 2. If the district provides notices orally or in some other mode of communication that is not written language, the district keeps written documentation (a) that it has provided such notice in an alternate manner, (b) of the content of the notice and (c) of the steps taken to ensure that the parent understands the content of the notice. | | | |
|  | State Requirements | | Federal Requirements | |
|  | 603 CMR 28.07(8) | | 34 CFR 300.322(e); 300.503(c) | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of student records and documents indicated that the district does not always ensure that communications with parents are in both English and the primary language of the home if such primary language is other than English.* |

| **CRITERION**  **NUMBER** |  | | | |
| --- | --- | --- | --- | --- |
|  | **Legal Standard** | | | |
| **SE 42** | Programs for young children three and four years of age  General requirements:   1. The school district ensures programs are available for eligible students three and four years of age. Such programs shall be developmentally appropriate and specially designed for students ages three and four years. 2. Where appropriate, the school district elects, consistent with federal requirements, to use the format and services of the Individualized Family Service Plan (IFSP), if appropriate, for an additional year as a means of transitioning eligible students to public school services. 3. Where appropriate the Team allows a student to remain in a program designed for three and four year old students for the duration of the school year in which the student turns five years old (including the summer following the date of the student's fifth birthday).   Types of Settings:   1. Inclusionary programs for young students are located in a setting that includes students with and without disabilities and meet the following standards:    1. Services in such programs are provided in the home, the public school, Head Start, or a licensed childcare setting.    2. For public school programs that integrate students with and without disabilities, the class size does not exceed 20 with 1 teacher and 1 aide and no more than 5 students with disabilities. If the number of students with disabilities is 6 or 7 then the class size does not exceed 15 students with 1 teacher and 1 aide. 2. Substantially separate programs for young students are located in a public school classroom or facility that serves primarily or solely students with disabilities. Substantially separate programs adhere to the following standards:    1. Substantially separate programs are programs in which more than 50% of the students have disabilities.    2. Substantially separate programs operated by the district limit class sizes to 9 students with 1 teacher and 1 aide. | | | |
|  | State Requirements | | Federal Requirements | |
|  | 603 CMR 28.06(7) | | 34 CFR 300.101(b);  300.124(b); 300.323(b) | |
|  | **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 three instructional groupings for young children do not meet the following requirements for appropriate student to staff ratios and class sizes:*  *Inclusionary programs:*  *For public school programs that integrate students with and without disabilities, the class size does not exceed 20 students with 1 teacher and 1 aide and no more than 5 students with disabilities. If the number of students with disabilities is 6 or 7 then the class size does not exceed 15 students with 1 teacher and 1 aide.*  *Substantially separate programs: Substantially separate programs are programs in which more than 50% of the students have disabilities. Substantially separate programs operated by the district limit class sizes to 9 students with 1 teacher and 1 aide.*  *Specifically, the groupings listed below are identified as inclusion classes, however, more than 50% of students in the groupings are students with disabilities. Groupings in which students with disabilities make up more than 50% of enrollment are considered substantially separate and must align with requirements identified above.*  ***Group A:*** *Full Day Inclusion: 1 teacher: 1 aide: 6 students with disabilities: 5 students without disabilities*  ***Group B:*** *Full Day Inclusion: 1 teacher: 1 aide: 7 students with disabilities: 3 students without disabilities*  ***Group C:*** *Full Day Inclusion: 1 teacher: 1 aide: 6 students with disabilities: 5 students without 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** |  | | | |
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|  | **Legal Standard** | | | |
| CR 13 | Availability of information and academic counseling on general curricular and occupational/vocational opportunities  Students in grades 7-12 all receive the same information and academic counseling on the full range of general curricular opportunities and any occupational/vocational opportunities available to them.  Race, color, sex, gender identity, religion, national origin, or sexual orientation are not presented as limiting factors in career determination.  The district ensures that English learners are taught to the same academic standards and curriculum as all students and provides the same opportunities to master such standards as other students, including the opportunity to enter academically advanced classes, receive credit for work done, and have access to the full range of programs.  The district uses grade appropriate content objectives for English learners that are based on the district curricula in English language arts, history and social science, mathematics, and science and technology/engineering, taught by qualified staff members. | | | |
|  | Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(a), (b); Title IX: 20 U.S.C. 1681; 34 CFR 106.31, 106.36; Section 504: 29 U.S.C. 794; 34 CFR 104.4, 104.37(b); Title II: 42 U.S.C. 12132; 28 CFR 35.130; NCLB: Title III, Part A, Sec. 3121(c)(1)(C); Title X, Part C, Sec. 721; Mass. Const. amend. art. 114; M.G.L. c. 71A, s. 7; c. 76, s. 5; 603 CMR 26.03 | | | |
|  | **Rating:** | **Prior Noncompliance: Corrective Action Under Review** | **District Response Required:** | **No** |

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| **Department of Elementary and Secondary Education Findings:** |
| ***Prior Noncompliance - Corrective Action Under Review****: During the 2024-2025 monitoring review conducted by the Office of Language Acquisition (OLA), it was determined that the district does not always ensure that English learners (ELs) have access to the full range of programs. OLA issued an ELE 5 Program Placement and Structure finding in January 2025 that included the following information:*  *"Equitable access issues identified during the review are as follows: scheduling does not allow newcomers access to K-8 Spanish program; newcomer ELs no longer have access to Spanish classes; and in middle school, ELs have an additional literacy block while their peers have access to World Language courses."*  *Corrective action for the ELE 5 finding will be reviewed and approved by (OLA) through the district's Continuous Improvement Monitoring Plan (CIMP).* |

| **CRITERION**  **NUMBER** | CIVIL RIGHTS METHODS OF ADMINISTRATION (CR)AND OTHER RELATED GENERAL EDUCATION REQUIREMENTS **VI. FACULTY, STAFF AND ADMINISTRATION** | | | |
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|  | **Legal Standard** | | | |
| **CR 18** | Responsibilities of the school principal   1. Instructional support. The principal in each of the district's schools promotes instructional practices responsive to student needs and ensures that adequate instructional support is available within the general education program for students and teachers. Instructional support includes remedial instruction for students, consultative services for teachers, availability of reading instruction at the elementary level, appropriate services for linguistic minority students, and other services consistent with effective educational practices and the requirements of M.G.L. c. 71B, §2. The principal consults with the administrator of special education regarding accommodations and interventions for students. Such efforts and their results are documented and placed in the student record. Additionally, when an individual student is referred for an evaluation to determine eligibility for special education, the principal ensures that documentation on the use of instructional support services for the student is provided as part of the evaluation information reviewed by the Team when determining eligibility. The school district does not limit a parent's right to refer a student for timely special education evaluation because the district has not fully explored and/or attempted some or all of the available instructional support programs or other interventions available in general education that may be described in the district's curriculum accommodation plan, including any pre-referral program. 2. Curriculum Accommodation Plan. The principal implements a curriculum accommodation plan developed by the district's general education program to ensure that all efforts have been made to meet the needs of diverse learners in the general education program. The plan assists the regular classroom teacher in analyzing and accommodating diverse learning styles of all children in the regular classroom and in providing appropriate services and support within the general education program including, but not limited to, direct and systematic instruction in reading and provision of services to address the needs of children whose behavior may interfere with learning. The plan includes provisions encouraging teacher mentoring and collaboration and parental involvement. (*The plan may be part of a multi-year strategic plan.)* 3. Early Literacy Screening. Effective July 31, 2023, each school district shall at least twice per year assess each student's reading ability and progress in literacy skills, from kindergarten through at least third grade, using a valid, developmentally appropriate screening instrument approved by the Department. Consistent with section 2 of chapter 71B of the general laws and the Department's dyslexia and literacy guidelines, if such screenings determine that a student is significantly below relevant benchmarks for age-typical development in specific literacy skills, the school shall determine which actions within the general education program will meet the student's needs, including differentiated or supplementary evidence-based reading instruction and ongoing monitoring of progress. Within 30 school days of a screening result that is significantly below the relevant benchmarks, the school shall inform the student's parent or guardian of the screening results and the school's response and shall offer them the opportunity for a follow-up discussion. 4. Coordination with special education. The principal, with the assistance of the administrator of special education, coordinates the delivery and supervision of special education services within each school building. 5. Educational services in home or hospital. Upon receipt of a physician's written order verifying that any student enrolled in a public school or placed by the public school in a private setting must remain at home or in a hospital on a day or overnight basis, or any combination of both, for medical reasons and for a period of not less than fourteen school days in any school year, the principal arranges for provision of educational services in the home or hospital. Such services are provided with sufficient frequency to allow the student to continue his or her educational program, as long as such services do not interfere with the medical needs of the student. The principal coordinates such services with the Administrator for Special Education for eligible students. Such educational services are not considered special education unless the student has been determined eligible for such services, and the services include services on the student's IEP. | | | |
|  | M.G.L. c. 71, § 38Q 1/2; 603 CMR 28.03(3); 603 CMR 28.03(1)(f) | | | |
|  | **Rating:** | **Partially Implemented** | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of student records, staff interviews, and documents indicated that within 30 school days of a screening result that is significantly below the relevant benchmark, the district does not always inform the student's parent or guardian of the screening results, the district's response, and offer the opportunity for a follow-up discussion.*  ***Prior Noncompliance- Corrective Action Under Review:***  *During the 2024-2025 monitoring review conducted by the Office of Language Acquisition (OLA), it was determined that the district does not consistently offer adequate and appropriate services for linguistic minority students. OLA issued an ELE 5 Program Placement and Structure finding in January 2025 that included the following information:*  *"Although the district is working on developing an ESL curriculum, a review of documentation, classroom observations and staff interviews indicated that currently the district does not have an ESL curriculum that is consistently used by schools in the district to support ESL instruction."*  *Corrective action for the ELE 5 finding will be reviewed and approved by OLA through the district's Continuous Improvement Monitoring Plan (CIMP).* |

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| This Integrated Monitoring Review 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: | Watertown IMR Final Report 2025 |
| Last Revised on: | April 1, 2025 |
| Prepared by: | TB/JK/AP |