



**Tiered Focused Monitoring Report
for Group B Universal Standards
Special Education and Civil Rights
District: Everett Public Schools
Onsite Dates: February 25 & 26, 2019
Tier Level: 1**



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During the 2018-2019 school year, Everett Public Schools participated in a Tiered Focused Monitoring Review conducted by the Department's Office of Public School Monitoring. The purpose of the Tiered Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

Districts and charter schools are reviewed every three years through Tiered Focused Monitoring. This review process emphasizes elements most tied to student outcomes, and alternates the focus of each review on either Group A Universal Standards or Group B Universal Standards.

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

In addition, the Department has reserved a specific set of criteria, collectively known as Targeted Standards, employed when LEA or school-level risk assessment data indicate that there is a potential issue. Identified Targeted Standards are assessed in addition to the Universal Standards.

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

Special Education (SE)

- selected requirements from the federal Individuals with Disabilities Education Act (IDEA-2004); the federal regulations promulgated under that Act at 34 CFR Part 300; M.G.L. c. 71B, and the Massachusetts Board of Education's Special Education regulations (603 CMR 28.00), as amended effective March 1, 2007.

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

- selected federal civil rights requirements, including requirements under Title VI of the Civil Rights Act of 1964; the Equal Educational Opportunities Act of 1974; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990, together with selected state requirements under M.G.L. c. 76, Section 5 as amended by Chapter 199 of the Acts of 2011 and M.G.L. c. 269 §§ 17 through 19.
- selected requirements from the Massachusetts Board of Education's Physical Restraint regulations (603 CMR 46.00).
- selected requirements from the Massachusetts Board of Education's Student Learning Time regulations (603 CMR 27.00).
- various requirements under other federal and state laws.

Tiered Focused Monitoring allows for differentiated monitoring based on a district/charter school's level of need, the Tiers are defined as follows:

LEAs in Tiers 1 and 2 have been determined to have no or low risk:

- Tier 1/Self-Directed Improvement: Data points indicate no concern on compliance and performance outcomes – meets requirements.
- Tier 2/Directed Improvement: No demonstrated risk in areas with close link to student outcomes – low risk.

LEAs in Tiers 3 and 4 have demonstrated greater risk:

- Tier 3/Corrective Action: Areas of concern include both compliance and student outcomes – moderate risk.
- Tier 4/Cross-unit Support and Corrective Action: Areas of concern have profound effect on student outcomes and ongoing compliance – high risk.

The phases of Tiered Focused Monitoring for Everett Public Schools included:

Self-Assessment Phase:

- The district reviewed special education and civil rights documentation for required elements including document uploads.
- The district reviewed a sample of special education student records selected across grade levels, disability categories and levels of need.
- Upon completion of these two internal reviews, the district's self-assessment was submitted to the Department for review.

On-site Verification Phase:

- 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 are being met.
- Review of additional documents for special education or civil rights.
- Surveys of parents of students with disabilities: Parents of students with disabilities were sent a survey to solicit information regarding their experiences with the district's implementation of special education programs, related services, and procedural requirements.
- Interviews of staff consistent with those criteria selected for onsite verification.
- Interviews of parent advisory council (PAC) representatives and other telephone interviews, as requested, by other parents or members of the general public.
- Observations of classrooms and other facilities: The onsite team visited a sample of classrooms and school facilities used in the delivery of programs and services to determine general levels of compliance with program requirements.

Report: For Tier 1 & 2 Tiered Focused Monitoring Reviews

Following the onsite visit, the onsite team holds an informal exit meeting to summarize its comments for the superintendent or charter school leader. Within approximately 20 business days of the onsite visit, the onsite chairperson forwards to the superintendent or charter school leader the findings from the Tiered Focused Monitoring Review. All districts/charter schools in Tiers 1 and 2, as part of the reporting process, then develop a Continuous Improvement and Monitoring Plan (CIMP) for any criteria receiving a rating of "Partially Implemented," "Not Implemented," and "Implementation in Progress." The CIMP outlines an action plan, identifies the success metric, describes the measurement mechanism and provides a completion timeframe to bring those areas into compliance with the controlling statute or regulation. Districts and charter schools are expected to incorporate the CIMP actions into their district and school improvement plans, including their professional development plans.

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 and means that 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. |
| Not Applicable | The requirement does not apply to the school district or charter school. |

Everett Public Schools

SUMMARY OF COMPLIANCE CRITERIA RATINGS

| | Universal Standards Special Education | Universal Standards Civil Rights and Other General Education Requirements | Targeted Standards |
|------------------------------|---|--|----------------------------|
| IMPLEMENTED | SE 15, SE 32, 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 10A, CR 10B, CR 10C, CR 12A, CR 16, CR 20, CR 21, CR 22, CR 23 | SE 44, SE 45, SE 46, SE 47 |
| PARTIALLY IMPLEMENTED | | CR 17A, CR 24 | |
| NOT IMPLEMENTED | | CR 25 | |

The review instruments, that include the regulatory requirements specific to the special education and civil rights criteria referenced in the table above, can be found at www.doe.mass.edu/psm/resources/default.html.

Improvement Area 1

Criterion: CR 17A - Use of physical restraint on any student enrolled in a publicly-funded education program

Rating: Partially Implemented

Description of Current Issue: A review of documents and staff interviews indicated that although the district has written restraint prevention and behavior support policy and procedures, the policy is not fully consistent with 603 CMR 46.00. Specifically, the policy does not include methods for preventing student violence, self-injurious behavior, and suicide; a statement prohibiting medication restraint, mechanical restraint, and prone restraint unless permitted pursuant to 603 CMR 46.03(1)(b); a statement prohibiting seclusion, and the use of restraint inconsistent with 603 CMR 46.00; and does not include a procedure for the use of time-out.

LEA Outcome: Everett Public Schools will ensure that its written restraint prevention and behavior support policies and procedures are updated to reflect 603 CMR 46.00 & 46.03, and that staff training provided by the district on physical restraint and behavior support policies and procedures incorporates those updates.

Action Plan: By August 23, 2019, the district will revise its written restraint prevention and behavior support policies and procedures to reflect 603 CMR 46.00 & 46.03, and present these changes to the school committee for approval. The district has contracted Walker Consulting to review and update current policy.

By September 16, 2019, the district will present the policy as an agenda item for the September principals' meeting. All building principals and assistant principals will receive training on the revised restraint procedures and serve as lead points of contact for each school.

By September 16, 2019, the district will train all staff on the revised policy. For relevant staff, the district will offer Therapeutic Crisis Intervention professional development in order to ensure staff have the knowledge and supports required to support students in crisis. The district notes that it will also offer professional development opportunities on a variety of topics in drug use, mental health, online issues and suicide prevention to staff through the Middlesex Partnership for Youth during the 2019-2020 school year.

By September 16, 2019, the district will implement an internal monitoring system in which staff provide quarterly updates to central administration regarding physical restraint. This quarterly administrative update will include identification of new staff to ensure that they receive training within one month of their hire.

Success Metric: By the beginning of the 2019-2020 school year, the district will have adopted and implemented the revised policy, and will have delivered training for all staff on the revised policy.

Evidence:

1. Copies of the approved revised restraint prevention and behavior support policy published in the student handbook and elsewhere as appropriate;
2. Agendas, training materials and attendance sheets for staff trainings; and
3. Results of internal monitoring system to ensure central administrators (Assistant Superintendents, Director of Special Education and Director of ABA) are informed and that new staff are trained.

Improvement Area 1

Measurement Mechanism: Continuing after the completion deadline:
The Assistant Superintendents, Director of Special Education, and/or the Director of ABA will ensure that 100% of all staff, including new hires, are trained on all restraint prevention and behavior support policies and procedures.

The Assistant Superintendents, Director of Special Education, and/or the Director of ABA will, in their regular communication with building principals, ensure that staff are aware of, and are enacting, changes to practice required by the revised policies and procedures.

The Assistant Superintendents, Director of Special Education, and/or the Director of ABA will continue to monitor quarterly updates of use of physical restraints and time-out.

Completion Timeframe: 09/16/2019

Improvement Area 2

Criterion: CR 24 - Curriculum review

Rating: Partially Implemented

Description of Current Issue: A review of documents and staff interviews indicated that the district does not consistently ensure that individual teachers review all educational materials for simplistic and demeaning generalizations, lacking intellectual merit, on the basis of race, color, sex, gender identity, religion, national origin and sexual orientation; and that appropriate activities, discussions and/or supplementary materials are used to provide balance and context for any such stereotypes depicted in materials. Specifically, the district's process calls for the review of textbooks, but not of supplementary or teacher-designed materials.

LEA Outcome: Everett Public Schools will create a committee consisting of subject area directors, coordinators, and department heads, serving as leaders for implementation. This committee will create user-friendly protocols to ensure textbooks, supplementary materials, and teacher-designed materials are reviewed according to the district's processes. The committee will also monitor the implementation of these protocols to ensure they are followed properly and consistently.

Action Plan: By August 23, 2019, the implementation committee, composed of principals and teachers from each building, will meet to create protocols and user-friendly review guides for examining teacher created materials and supplementary materials. The principals will support teachers with the implementation of these protocols during common planning meetings.

By January 27, 2020, classroom teachers will have been trained on these new protocols and the tools (checklists, etc.) used to implement them and will use these tools consistently. The committee, or other district curriculum staff, will monitor implementation and be available to answer questions that arise from the process.

Improvement Area 2

Success Metric: By the end of August 2019, the committee will be in place and will have met to begin implementing the action plan outlined above.

By the end of January 2020, 100% of departments at all Everett schools will have documented successful implementation of review of materials in department meetings and common planning time.

Evidence:

1. Written protocols and review guides in checklist form;
2. Copies of checklists completed by teachers; and
3. Any necessary actions taken to ensure equity will be noted and referred to the Director of Curriculum for action.

Measurement Mechanism: Continuing after the completion deadline:

The committee will monitor the implementation of these protocols by reviewing documentation of individual teacher review of materials in department meetings and common planning time. Documentation can include completed copies of the tools created by the committee, or other documentation submitted by school-level department chairs to either the committee or to district curriculum staff.

Completion Timeframe: 01/27/2020

Improvement Area 3

Criterion: CR 25 - Institutional self-evaluation

Rating: Not Implemented

Description of Current Issue: A review of documents and staff interviews indicated that the district does not evaluate all aspects of its K-12 program annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities.

LEA Outcome: Everett Public Schools will evaluate all aspects of its K-12 program annually to ensure all students have equal access to all programs, including academic and extracurricular. The district will hold regularly scheduled meetings at the school and district level to review data and take action when necessary to ensure equal access.

Action Plan: By September 16, 2019, the Everett Public Schools will implement a routine reporting schedule in which assistant principals run reports of student data based on involvement in K-12 programs and track that data as part of quarterly meetings. The Assistant Superintendent conducts these meetings and the Director of Data does all support for data collection. The schools will adopt a uniform protocol for all meetings.

By January 27, 2020, the Everett Public Schools will compile a list of changes made to ensure equal access for all programs that result from this process.

Improvement Area 3

Success Metric: By the end of the 2019-2020 school year, Everett Public Schools will have a record of data reporting and meetings to ensure improved access for all students to all programs, including athletics and other extracurricular activities.

Evidence:

1. Data meetings will be recorded with a sign-in sheet and action plan;
2. Discussions in quarterly meetings will be recorded in the meeting notes; and
3. Any necessary actions taken to ensure equity will be noted and referred to the Director of Curriculum for action.

Measurement Mechanism: Continuing after the completion deadline:

Schools will ensure consistent implementation by adopting a uniform protocol for all meetings.

The district will review student rosters for academic, athletic and extracurricular activities and other forms of data gathering to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs.

The district will review changes made to ensure equal access for all programs that result from this process.

The district will make the results of its annual data reporting and results available to the school community.

Completion Timeframe: 01/27/2020