



Carlisle Public Schools

Tiered Focused Monitoring Report

**For Group A Universal Standards
Tier Level 1**

Dates of Onsite Visit: March 15 & 16, 2021

Date of Final Report: May 12, 2021



Jeffrey C. Riley
Commissioner of Elementary and Secondary Education

During the 2020-2021 school year, Carlisle 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); and
- 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 Carlisle Public Schools included:

Self-Assessment Phase:

- District reviewed special education and civil rights documentation for required elements including document uploads.
- 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 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 and 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.
- Interview of one staff member consistent with those criteria selected for onsite verification.
- Interviews of two special education parent advisory council (SEPAC) representatives.

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.

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 onsite team reviewed the results of Indicator data submissions for Indicators 11, 12 and 13. 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:

	Compliant	Non-Compliant	Not Applicable
Indicator 11 – Initial Evaluation Timelines	X		
Indicator 12 – Early Childhood Transition	X		
Indicator 13 – Secondary Transition	X		

DEFINITION OF COMPLIANCE RATINGS

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.

Carlisle Public Schools

SUMMARY OF COMPLIANCE CRITERIA RATINGS

	Universal Standards Special Education	Universal Standards Civil Rights and Other General Education Requirements
IMPLEMENTED	SE 1, SE 2, SE 3, SE 3A, SE 6, SE 7, SE 8, SE 9, SE 9A, SE 10, SE 11, SE 12, SE 13, SE 14, SE 17, SE 18A, SE 19, SE 22, SE 25, SE 26, SE 29, SE 34, SE 35, SE 37, SE 38, SE 39, SE 40, SE 41, SE 42, SE 43, SE 48, SE 49	CR 13, CR 14, CR 18
PARTIALLY IMPLEMENTED	SE 20	

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:** SE 20 - Least restrictive program selected**Rating:** Partially Implemented**Description of Current Issue:** A review of student records and an administrative interview indicated that if a student is removed from the general education classroom at any time, the Team does not consistently state why the removal is considered critical to the student's program and the basis for its conclusion that education of the student in a less restrictive environment, with the use of supplementary aids and services, could not be achieved satisfactorily.**LEA Outcome:** The district will ensure that when a student is removed from the general education classroom at any time, the Team states why the removal is considered critical to the student's program and the basis for its conclusion that education of the student in a less restrictive environment, with the use of supplementary aids and services, could not be achieved satisfactorily.**Action Plan:** Since receiving feedback from the Department regarding non-compliance, the district has taken immediate steps to improve Nonparticipation Justification statements, including administrative review of all recently written IEPs to ensure the Team states why a student's removal from the general education classroom is warranted. Newly developed procedures and protocols were created to ensure that when a student is removed from the general education classroom at any time, the Team states why the removal is considered critical to the student's program and the basis for its conclusion that education of the student in a less restrictive environment, with the use of supplementary aids and services, could not be achieved satisfactorily.

By June 16, 2021, the district will train all special education faculty on the newly developed procedures and protocols to ensure consistency with all Nonparticipation Justification statements. The district will also implement an internal monitoring and tracking system to ensure that procedures and protocols are followed. The internal monitoring and tracking system will include bimonthly reviews of draft IEPs and a quarterly record review of finalized IEPs.

By September 30, 2021, the district will conduct a review of a representative sample of student records to ensure that Nonparticipation Justification statements include all required elements. For any records found to be out of compliance, the district will conduct a root-cause analysis and implement additional corrective actions, as appropriate. Additional training will be provided to any faculty requiring further feedback and guidance.

Success Metric: By April 2021 and beyond, all IEPs for students removed from the general education classroom will include Nonparticipation Justification statements that state why the removal is considered critical to the student's program and the basis for the Team's conclusion that education of the student in a less restrictive environment, with the use of supplementary aids and services, could not be achieved satisfactorily.

Evidence:

- Revised procedures document: "Nonparticipation Justification Statement Procedures and Expectations Training Manual"
- Agendas, training materials, and attendance sheets
- Agendas of bimonthly meetings held to monitor and review compliance
- Results of a record review, including the following: the number of records reviewed; the

Improvement Area 1

number found compliant; an explanation of the root cause for any continued non-compliance; and a description of additional corrective actions taken by the district to address any identified non-compliance

Measurement Mechanism: The Director of Student Services will be responsible for implementing an internal monitoring system that ensures current and future compliance. This monitoring system will include bimonthly reviews of draft IEPs, quarterly reviews of active IEPs, and additional corrective actions if non-compliance is identified.

Completion Timeframe: 09/30/2021