



**Pembroke Public Schools**

**Tiered Focused Monitoring Report**

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

**Date of Onsite Visit: January 8, 2020**

**Date of Final Report: March 11, 2020**



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Commissioner of Elementary and Secondary Education

During the 2019-2020 school year, Pembroke 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 Pembroke Public Schools included:

Self-Assessment Phase:

- District reviewed special education and civil rights documentation for required elements including document uploads.
- Upon completion of this internal review, the district's self-assessment was submitted to the Department for review.

On-site Verification Phase:

- 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.
- 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

<b>Commendable</b>	Any requirement or aspect of a requirement implemented in an exemplary manner significantly beyond the requirements of law or regulation.
<b>Implemented</b>	The requirement is substantially met in all important aspects.
<b>Implementation in Progress</b>	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.
<b>Partially Implemented</b>	The requirement, in one or several important aspects, is not entirely met.
<b>Not Implemented</b>	The requirement is totally or substantially not met.
<b>Not Applicable</b>	The requirement does not apply to the school district or charter school.

## Pembroke Public Schools

### SUMMARY OF COMPLIANCE CRITERIA RATINGS

	Universal Standards  Special Education	Universal Standards  Civil Rights and Other General Education Requirements
<b>IMPLEMENTED</b>	SE 15, SE 32, 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 10A, CR 10B, CR 10C, CR 12A, CR 16, CR 17A, CR 20, CR 21, CR 22, CR 23, CR 24
<b>PARTIALLY IMPLEMENTED</b>		CR 25
<b>NOT IMPLEMENTED</b>		

The Tiered Focused Monitoring Toolkit, which includes the regulatory requirements specific to the special education and civil rights criteria referenced in the table above, can be found at <http://www.doe.mass.edu/psm/resources/default.html>.

<b>Improvement Area 1</b>
<b>Criterion:</b> CR 25 - Institutional self-evaluation
<b>Rating:</b> Partially Implemented
<b>Description of Current Issue:</b> A review of documentation and administrator interviews indicated that the district does not annually review all aspects of its K-12 programming 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.
<b>LEA Outcome:</b> Pembroke Public Schools will review all aspects of the K-12 programming 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 and, if applicable, create an action plan to address any concerns identified.
<p><b>Action Plan:</b> The district will conduct a self-evaluation of K-12 programming through equity walks, surveys, and review of data points. The district will include administrators, content supervisors, teachers, students and families in this evaluation. Specifically, the evaluation will include:</p> <p>1) Equity Walks: By April 22, 2020, Administrative Teams will "walk" through all five buildings and observe a variety of classes/courses to evaluate our teachers' ability to support equity and inclusion for all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability or housing status.</p> <p>2) Equity Data Walks: By May 20, 2020, Administrative Teams will conduct data walks to analyze and discuss equity using achievement data; entrance criteria for advanced programming; supports for students; policies and handbook procedures; data on bullying and discipline; complaints about accessibility; athletics and extracurricular participation; and distribution of students in programs.</p> <p>3) Surveying/Questionnaires: By June 19, 2020, the district will conduct surveys for administrators, teachers, families, and students to obtain feedback about equal access for all students to the district's programs, including athletics and other extracurricular activities and, if applicable, create an action plan to address any identified concerns.</p> <p>4) Survey Results: By October 19, 2020, the district will analyze survey results, identify discrepancies or concerns, and set Smart Goals and timelines to address any identified areas of concern.</p>
<p><b>Success Metric:</b> The district will provide assurance to the Department that each of the following steps are accomplished:</p> <p>Equity walks will be conducted in all five school buildings in the district.  Student data will be analyzed and discussed.  Surveys will be conducted for administrators, teachers, families, and students.  Identified areas of concern will be addressed by setting Smart Goals with timelines.</p>
<b>Measurement Mechanism:</b> The district will conduct annual institutional self-evaluations to ensure 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 the district's programs,

**Improvement Area 1**

including athletics and other extracurricular activities and, where necessary, take appropriate actions to address identified issues.

**Completion Timeframe:** 10/19/2020