



North Brookfield Public Schools

Tiered Focused Monitoring Report

Continuous Improvement and Monitoring Plan

For Group B Universal Standards
Tier Level 1

Dates of Onsite Visit: January 10-11, 2023

Date of Final Report: June 13, 2023

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION
TIERED FOCUSED MONITORING REPORT**

North Brookfield Public Schools

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MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION TIERED FOCUSED MONITORING REPORT INTRODUCTION

During the 2022-2023 school year, North Brookfield Public Schools participated in a Tiered Focused Monitoring Review (TFM) conducted by the Department's Office of Public School Monitoring (PSM). The purpose of the Tiered Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

Each school district, charter school, vocational school, and virtual school undergoes a Tiered Focused Monitoring Review every three years. The statewide Tiered Focused Monitoring cycle is posted at <https://www.doe.mass.edu/psm/tfm/6yrcycle.html>.

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 Targeted Standards, employed if LEA or school level risk assessment data indicate there is a potential issue; the 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 September 20, 2022.

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

- Selected 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 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.

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- 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.

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.

Tier Level:

The level of monitoring varies based on tier designation, aligning supports to the level of need and ensuring that districts and schools with greater needs receive appropriate supports to make sustained improvements.

Tier	Title	Description
1	Self-Directed Improvement	Data points indicate no concern on compliance and student outcomes.
2	Directed Improvement	No demonstrated risk in areas with close link to student outcomes.
3	Corrective Action	Areas of concern include both compliance and student outcomes.
4	Cross-unit Support and Corrective Action	Areas of concern have a profound effect on student outcomes and ongoing compliance.

For the 2022-2023 school year, the tier assignments are based on:

- Annual drop-out rate for students with disabilities
- Five-year cohort graduation rate for students with disabilities
- Public School Monitoring compliance data from the previous review
- Problem Resolution System data, specifically findings of noncompliance
- Special education SPP/APR compliance Indicator data for Indicators 4B, 9 & 10
 - Indicator 4B: Significant discrepancy by race or ethnicity in removal of students with IEPs greater than 10 days
 - Indicator 9: Overall disproportionate representation of racial and ethnic groups identified as eligible for special education
 - Indicator 10: Disproportionate representation of racial and ethnic groups within specific disability categories
- Special education SPP/APR performance Indicator data for Indicators 5 & 6
 - Indicator 5: Education Environments (6-21)
 - Indicator 6: Preschool Environments
- Significant Disproportionality data 2021-2022 & 2022-2023

Tiering adjustments may be made for districts engaged in work with the Department's Statewide System of Support and have schools identified as requiring assistance and intervention. Tiering assignments may also be adjusted for schools and districts unable to remedy noncompliance within one year of the previous TFM review, as well as for charter schools requiring additional oversight based on conditions of their charter.

Report: For Tier 1 & 2 Tiered Focused Monitoring Reviews

Following the onsite visit, the PSM team holds an informal exit meeting to summarize the review for the superintendent or charter school leader. Within approximately 20 business days of the onsite visit, the chairperson forwards the TFM Feedback Summary that includes findings from the Tiered Focused Monitoring Review to the superintendent or charter school leader.

As part of the reporting process, all districts/charter schools in Tiers 1 and 2 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 is due to the Department within 20 business days after the issuance of the Feedback Summary and is subject to the Department's review and approval. 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. Department staff provide support and assistance to districts and charter schools on the development of a CIMP.

Once the CIMP is approved, it is issued as the Final Report.

Department staff also provide ongoing technical assistance as the school or district is implementing the approved CIMP. **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 Feedback Summary.**

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

TIERED FOCUSED MONITORING FINAL REPORT for North Brookfield Public Schools

The Massachusetts Department of Elementary and Secondary Education conducted a Tiered Focused Monitoring Review in North Brookfield Public Schools during the week of January 9, 2023, 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:

Self-Assessment Phase:

- District review of special education and civil rights documentation for required elements including document uploads.
- District review of a sample of special education student records to assess implementation of required discipline procedures.
- Upon completion of the self-assessment, the district submitted the data to the Department for review.

On-site Verification Phase:

- Interviews of administrative staff consistent with those criteria selected for onsite verification.
- Interview of a parent advisory council (PAC) 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 to determine compliance with required discipline procedures.
- 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.

The Tiered Focused Monitoring 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," and "Implementation in Progress." (Refer to the "Definition of Compliance Ratings" section of the report.) Tiered Focused Monitoring 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 are expected to incorporate the corrective actions into their district and school improvement plans, including their professional development plans.

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; 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.

North Brookfield 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 35, SE 36, SE 50, SE 51, SE 52, SE 54, SE 55, SE 56	CR 3, CR 7, CR 7A, CR 7B, CR 7C, CR 8, CR 10A, CR 10B, CR 10C, CR 20, CR 21, CR 22, CR 23, CR 24	SE 44, SE 45, SE 46, SE 47
PARTIALLY IMPLEMENTED		CR 12A, CR 16, CR 17A, CR 25	
NOT IMPLEMENTED	None		
NOT APPLICABLE	SE 52A		

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>>.

CONTINUOUS IMPROVEMENT AND MONITORING PLAN

Improvement Area 1
Criterion: CR 12A - Annual and continuous notification concerning nondiscrimination and coordinators
Rating: Partially Implemented
Description of Current Issue: Document review and interviews indicated that although the district's Equal Employment Opportunities policy includes all protected categories, the employment opportunities section on the district's website does not include sex as a protected category. Likewise, the application for professional employment is missing gender identity as a protected category.
LEA Outcome: North Brookfield Public Schools' nondiscrimination statement will always include all protected categories. Specifically, the employment opportunities section on the district website will include sex as a protected category, and the district application for professional employment will include gender identity.
Action Plan: By September 29, 2023, the district will update the employment opportunities section and professional employment application to include all protected categories. By September 29, 2023, the district will notify appropriate staff of the changes.
Success Metric: By September 2023 and beyond, the district's nondiscrimination statement will always contain all protected categories. Evidence: • Updated employment opportunities section and professional employment application with links to district website • Notification to appropriate staff
Measurement Mechanism: The district's leadership team will annually review all relevant sections of the website that contain the nondiscrimination statement to ensure all required protected categories are included prior to posting.
Completion Timeframe: 09/29/2023

Improvement Area 2

Criterion: CR 16 - Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion

Rating: Partially Implemented

Description of Current Issue: Document review and interviews indicated that the district's notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion is not consistently sent within five days of the student's tenth consecutive absence and does not include the following requirements:

- Student as an addressee; and
- At least two dates and times for an exit interview.

LEA Outcome: North Brookfield Public Schools will consistently send notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion within five days of the student's tenth consecutive absence and the notice will include the following requirements:

- Student as an addressee; and
- At least two dates and times for an exit interview.

Action Plan: By September 29, 2023, the district will update the notice to include all requirements and develop an internal tracking system to ensure that notices are sent within five days of the student's tenth consecutive absence. Appropriate staff will be notified of the updates and trained on the tracking system.

By January 29, 2024, the district will conduct an administrative review of student records to ensure that the updated notice is sent as required and includes all necessary information. For any non-compliance identified, the district will conduct a root cause(s) analysis and implement corrective action, as necessary.

Success Metric: By January 2024 and beyond, the district will ensure that the notice to students 16 and over leaving school without a high school diploma, certificate of attainment, or certificate of completion is provided within five days of the tenth consecutive absence and includes all required content.

Evidence:

- Updated notice template
- Internal tracking system
- Training agenda and attendance
- Results of administrative record review
- Root cause analysis and corrective action taken for any non-compliance found

Measurement Mechanism: Throughout the school year, the high school principal will implement the internal tracking system to ensure proper provision of the notice. The high school principal will also review the notice for compliance and make any necessary updates at the beginning of each school year. All notices will be reviewed prior to sending to the student and parent. Any necessary changes will be communicated to the high school guidance counselors and other relevant staff.

Completion Timeframe: 01/29/2024

Improvement Area 3
Criterion: CR 17A - Use of physical restraint on any student enrolled in a publicly-funded education program
Rating: Partially Implemented
Description of Current Issue: Document review and interviews indicated that the district's written restraint prevention and behavior support policy and procedures do not include the following requirements: • Methods for preventing student violence, self-injurious behavior, and suicide; • Methods for engaging parents in discussions about restraint prevention and use; • Procedures for receiving and investigating complaints relating to physical restraints; • A description of the program's training requirements; • Procedures for conducting periodic review of data and documentation on the use of physical restraint; and • Procedures for implementing the reporting requirements as described in 603 CMR 46.06.
LEA Outcome: The district's physical restraint prevention and behavior support policy and procedures will address all requirements including the following: • Methods for preventing student violence, self-injurious behavior, and suicide; • Methods for engaging parents in discussions about restraint prevention and use; • Procedures for receiving and investigating complaints relating to physical restraints; • A description of the program's training requirements; • Procedures for conducting periodic review of data and documentation on the use of physical restraint; and • Procedures for implementing the reporting requirements as described in 603 CMR 46.06.
Action Plan: By August 25, 2023, the district will update the physical restraint prevention and behavior support policy and procedures to include all requirements. By September 29, 2023, the district will provide training to staff on the updated policy and procedures and disseminate to the school community.
Success Metric: By September 2023 and beyond, the district's physical restraint prevention and behavior support policy and procedures will include all requirements. Evidence: • Updated physical restraint prevention and behavior support policy and procedures • Training materials, agendas, and attendance • Evidence of dissemination to school community
Measurement Mechanism: The superintendent and school building principals will review the physical restraint prevention and behavior support policy and procedures for compliance in the spring of each school year. Training will occur within the first month of each school year and, for employees hired after the school year begins, within a month of their employment.
Completion Timeframe: 09/29/2023

Improvement Area 4
Criterion: CR 25 - Institutional self-evaluation
Rating: Partially Implemented
Description of Current Issue: Document review and interviews indicated that the district is in the process of developing procedures to annually evaluate all aspects of its K-12 programs 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. However, these procedures have yet to be implemented.
LEA Outcome: The district will evaluate all aspects of its K-12 programs 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. The district will make changes based on the findings of the evaluation.
Action Plan: By September 29, 2023, the district will develop evaluation protocols, procedures, and tools that include data review; root cause analysis and prioritization; input from families, staff, and students; action planning; and progress monitoring. In addition, the district will train staff and other parties responsible for conducting the institutional self-evaluation. By January 29, 2024, the district will complete a self-evaluation summary that includes the following: • Results of the data analysis with any discrepancies identified; • Results of the root cause analysis and prioritization; • Action plan to address discrepancies; and • Progress monitoring timelines. The superintendent will present the summary and recommendations to the school committee.
Success Metric: By January 2024 and beyond, the district will evaluate all aspects of its K-12 programs 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 K-12 programs, including athletics and other extracurricular activities. The district will make such changes as are indicated by the evaluation. Evidence: • Protocols, procedures, and tools for annual self-evaluation • Training agendas, materials, attendance • Completed institutional self-evaluation summary • School committee meeting agenda
Measurement Mechanism: The superintendent will ensure that the institutional self-evaluation occurs annually and aligns with the district's strategic planning process and school improvement plans. Based upon the results of this evaluation, the superintendent will make recommendations to the school committee to support and improve equitable access to programming.
Completion Timeframe: 01/29/2024