

# **Boston College Campus School**

**BC Campus School Day Program** 

# **Program Review Report**

Week of Onsite Visit: October 21, 2024 Draft Report Issued: October 30, 2024 Final Report Issued: November 07, 2024 Corrective Action Plan Due:

Department of Elementary and Secondary Education Onsite Team Members:
Christina Belbute, Chairperson
Lynda Womack, Team Member
Cecelia Auditore, Team Member



Russell D. Johnston, Ph.D. Acting Commissioner

Approval for special education day and residential school programs operating in Massachusetts is contingent upon meeting the requirements of 603 CMR 28.09, "Approval of Public and Private Day and Residential Special Education School Programs," 603 CMR 18.00, "Program and Safety Standards for Approved Public or Private Day and Residential Special Education School Programs," and 603 CMR 46.00 "Prevention of Physical Restraint and Requirements, If Used." Approval by the Department does not relieve special education day and residential school programs of their obligation to comply with other applicable state or federal statutory or regulatory requirements or with requirements set forth in their contracts with referral sources. The Department may change the approval status at any point during this three-year period if circumstances arise that warrant such a change.

For special education day and residential school programs that do not meet all requirements for Full Approval, the Department may issue a Provisional Approval effective for a period not to exceed 6 months, provided that the Department has determined that the health and safety of the students are protected and the program demonstrates the ability to implement the goals and objectives of each enrolled student's IEP. During this period, the special education day or residential school program must submit progress reports that addresses the issues that did not meet approval requirements.

For a special education day or residential school programs that substantially meets all requirements evaluated during the review the Department will issue a Full Approval. Full Approval will remain in effect for three school years and will expire on August 31st of the third school year.

BC Campus School Day Program
Full Approval

Expires: August 31, 2027

# MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION

#### APPROVED SPECIAL EDUCATION SCHOOL PROGRAM REVIEW REPORT

## **OVERVIEW OF REVIEW PROCEDURES**

## INTRODUCTION

The Massachusetts Department of Elementary and Secondary Education ("Department") is required under M.G.L. c. 71B, §10 to review special education programs in approved special education schools that serve publicly funded students under the provisions of Board of Elementary and Secondary Education Regulations 603 CMR 18.00, 28.09 and 46.00. Each year, the Department's Office of Approved Special Education Schools (OASES) conducts onsite visits to selected approved special education school programs to verify the implementation of these programs In the Spring of the previous school year, the schools participating in the review cycle were notified of the dates of the onsite visits and were required to conduct a Data Collection before the onsite portion of the review using the Department's Communication Hub and Monitoring Portal (CHAMP).

The statewide six-year Approved Special Education School Program Review cycle together with the Department's Mid-cycle monitoring schedule is posted on the Department's

Website at <a href="http://www.doe.mass.edu/oases/ps-cpr/6yrcycle.html">http://www.doe.mass.edu/oases/ps-cpr/6yrcycle.html</a>.

## **Approved Special Education School Program Review Elements**

Criteria: The Program Review criteria encompass key elements drawn from 603 CMR 18.00, 28.09, 46.00 and the approved special education school program's application for approval. They also include those required by the federal Office for Special Education Programs (OSEP) and revised requirements of the Individuals with Disabilities Education Act, 20 U.S.C. Section 1400 et seq. (IDEA-2004) as described in the Department's Special Education Advisories. Through the Desk Review the OASES chairperson examines the Data Collection submission and determines which criteria will be followed up on through onsite verification activities. The Data Collection and Desk Review are both described below.

**<u>Data Collection Phase:</u>** This is a requirement for all agencies being monitored. It is completed for the onsite review and covers all of the Department selected criteria. The agency is responsible for completing the Self- Assessment for each individually approved program being reviewed, which consists of:

- · Agency review of policies and procedures,
- Agency review student documentation including a sample of student records,
- Agency review staff documentation including a sample of staff records, if applicable, and
- · Agency review of facilities, buildings, and grounds.

Upon completion of these portions, the agency submits the Data Collection to the Department for review.

Desk Review Phase: The OASES chairperson assigned to each agency reviews the responses by the approved special education school regarding the critical elements for appropriate policies, procedures, and practices, as well as actual documents and data submitted for each criterion. The OASES chairperson also reviews student record data, staff record data, and explanatory comments. The outcome of this review, along with 3-year trend data from the Problem Resolution System, restraint reports, restraint injuries, serious incidents and notification or prior approval from the Department through its notification system is used to determine the scope and nature of the onsite activities.

## **Onsite Verification Phase:**

This includes activities selected from the following:

- Interviews with administrative, instructional, and other staff consistent with those criteria selected for verification.
- Telephone interviews as requested by parents, guardians or members of the general public.
- Review of student records and staff records: The Department selects a sample of student and staff records from those the agency reviewed as part of its data collection to verify the accuracy of the data. The Department also conducts an independent review of a sample of student and staff records that reflect activities conducted since the beginning of the school year. The Department monitoring team will conduct this review using standard Department procedures to determine whether procedural and programmatic requirements have been implemented.
- Observation of classrooms and other facilities: The team observes 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.

**Team:** Depending upon the scope of follow-up activities that have been identified based on the Department's Desk Review of the agency's Data Collection, a two-to-three-member Department team will conduct a two-to-five-day Program Review.

**Final Report:** A Final Report is then issued via the CHAMP. The Final Report includes findings organized under 4 specified compliance areas. The findings explain the "ratings," or determinations by the Department about the implementation status of the compliance criteria reviewed within each of these areas. The ratings indicate those criteria that were found by the OASES monitoring team to be "Implemented," "Implementation in Progress," "Partially Implemented," or "Not Implemented."

Response: The approved special education school program must propose to the Department corrective action to bring into compliance with the required statute or regulation in each area found to be not fully "Implemented". In some instances, the team may have found certain requirements to be fully "Implemented" but made a specific comment on the school program's implementation methods that also may require response from the approved special education school program. Under federal Special Education State Performance Plan requirements pursuant to IDEA-2004, public and approved special education school programs serving disabled students 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 Program Review Report.

## REPORT INTRODUCTION

A three-member team conducted a visit to Boston College Campus School during the week of October 21, 2024 to evaluate the implementation of selected compliance criteria under the Massachusetts Board of Elementary and Secondary Education Regulations 603 CMR 18.00 (Program and Safety Standards for Approved Public or Private Day and Residential Special Education School Programs) and 603 CMR 28.09 (Approval of Public or Private Day and Residential Special Education School Programs), 603 CMR 46.00 (Prevention of Physical Restraint and Requirements If Used), M.G.L c. 71B, the federal Individuals with Disabilities Education Act, 20 U.S.C. Section 1400 et seq, as amended in 2004 (IDEA--2004), and civil rights provisions that are pertinent to Approved Special Education School Programs. The team appreciated the opportunity to interview staff, to observe classroom facilities, and to review the program efforts underway.

The Department is submitting the following Approved Special Education School Program Review Report containing findings made pursuant to this onsite visit. In preparing this report the team reviewed extensive documentation regarding the operation of the school programs, together with information gathered by means of the following Department program review methods:

- Interviews of 2 leadership staff;
- Interviews of 2 related services staff;
- Interviews of 2 teaching staff; and
- Interviews of 2 direct care staff.
- Student record review: A sample of 6 Massachusetts student records was selected by the Department. Student records were first examined by the school program's staff and then verified by the OASES monitoring team using standard Department student record review procedures to make determinations regarding the implementation of procedural and programmatic requirements. An additional number of randomly selected student records were also reviewed by the OASES monitoring team to ensure determinations regarding the implementation of procedural and programmatic requirements remain in effect.
- Staff record review: A sample of 6 staff records was selected by the Department. Staff records were first examined by the school program's staff and then verified by the OASES monitoring team using standard Department staff record review procedures to make determinations regarding the implementation of procedural and programmatic requirements. An additional number of randomly selected staff records were also reviewed by the OASES monitoring team staff to ensure determinations regarding the implementation of procedural and programmatic requirements remain in effect.
- Observation of classrooms and other facilities: A sample of instructional classrooms and other facilities used in the delivery of programs and services was observed to determine general levels of compliance with program requirements.

# 1. Summary of Compliance Criteria Included In This Report Requiring Corrective Action Plan Development In Response to the Following Program Review Report Findings

# **Implemented**

• The requirement is totally or substantially met

# **Implemented Response Required**

• The requirement is met, but the Agency is required to provide additional information.

## **Implementation in Progress**

• This rating is used for criteria containing new or updated legal requirements and means that the agency 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.

	Policies & Procedures				
Criteria	Implemented	Implemented Response Required	Implementation In Progress	Partially Implemented	Not Implemented
1.2 Program & Student Descriptions, Program Capacity	All				
3.1(d) Evacuation and Emergency Procedures	All				
4.4 Advance Notice of Proposed Program/Facility Change	All				
4.5 Immediate Notification	All				
6.1 Daily Instructional Hours/6.4 School Days Per Year	All				
8.4 Program Modifications and Support Services for English	All				
9.1(a) Student Separation Resulting from Behavior Support	All				
9.7 Terminations	All				
11.1 Staff Policies and Procedures Manual				BC Campus School Day Program	

11.11 Supervision of Students	All			
11.12 Equal Access	All			
12.1 New Staff Orientation and Training	All			
12.2 In-Service Training Plan and Calendar			BC Campus School Day Program	
15.1 Parental Involvement and Parents' Advisory Group	All			
15.5 Parent Consent and Required Notification	All			
15.8 Registering Complaints and Grievances-Parents, Students and Employees	All			

	Staff Documentation				
Criteria	Implemented	Implemented Response Required	Implementation In Progress	Partially Implemented	Not Implemented
10.1 Staffing for Instructional Groupings	All				
11.2 Administrative Responsibility	All				
11.3 Educational Administrator Qualifications	All				
11.4 Teachers (Special Education Teachers and General Education Teachers)	All				
11.5 Related Services Staff	All				
11.6 Staff Roster	All				

Student Documentation					
Criteria	Implemented	Implemented Response Required	Implementation In Progress	Partially Implemented	Not Implemented
5.2(a) Contracts	All				
8.5 Current IEP & Student Roster	All				

8.8 IEP - Progress Reports	All		
10.2 Age Range	All		
15.3 Information to be Translated into Languages Other Than English	All		
16.7 Preventive Health Care	All		
16.11 Student Allergies	All		
18.1 Confidentiality of Student Records	All		
19 Anti-Hazing	All		

Buildings/Facilities					
Criteria	Implemented	Implemented Response Required	Implementation In Progress	Partially Implemented	Not Implemented
2.2 Approvals, Licenses, Certificates of Inspection	All				
4.2 Public Information and Postings	All				

#### **Policies & Procedures**

#### 11.1 Staff Policies and Procedures Manual

#### Requirements

The program shall develop and implement written policies and procedures for staff, maintained in a manual that describes:

- 1. Criteria and procedures for hiring. This must include the program's Criminal Offender Record Information (CORI) policy regarding CORI checks on employees, volunteers and interns whose responsibilities bring them into direct and unmonitored contact with students. Such checks shall be conducted upon initial hire and every three years thereafter. **NOTE**: A residential program licensed by EEC does not need to conduct independent CORI checks where those checks have been done through EEC;
- 2. Procedures for Criminal History Record Information (CHRI);
- 3. Procedures for the evaluation of staff including frequency and requirement that evaluations are signed and dated by reviewer and employee;
- 4. Procedures for disciplining of staff (including suspensions and dismissals);
- 5. A plan for using volunteer and/or intern services; and
- 6. Statement of equal employment/educational opportunities in regard to race, color, sex, gender identity, religion, national origin, sexual orientation, disability, or age.

#### **Legal Standards**

18.05(11); 18.05(11)(c)(1); 28.09(7); 28.09(11)(a);

M.G.L. c. 71, § 38R; DESE Advisory on CORI revised 5/7/07; 603 CMR 26.00

#### **Confirmed Findings**

Applies To	Rating	Response Required	Finding Description
BC Campus School Day Program	Partially Implemented	Yes	While interviews indicated that staff routinely and regularly complete Criminal History Record Information (CHRI) fingerprinting checks for employees as required by the state regulations, a review of documentation and staff records indicated that certain required documentation was not available for some employees.

# 12.2 In-Service Training Plan and Calendar

# Requirements

All staff, including new employees, interns and volunteers, must participate in annual in-service training on average at least two hours per month.

The following topics are required in-service training topics and must be provided annually to all staff:

- a. Reporting abuse and neglect of students to the Department of Children and Families and/or the Disabled Persons Protection Commission;
- b. Student discipline and behavior support procedures;
- c. Program's use of physical restraints;
- d. Runaway policy;
- e. Emergency procedures including Evacuation Drills and Emergency Drills utilization of the alarm system and evacuations in instances of fire or natural disaster;
- f. Civil rights responsibilities (discrimination and harassment) regarding race, color, sex, gender identity, religion, national origin, sexual orientation, disability and homelessness;
- g. Bullying Prevention and Intervention;
- h. Medication administration, if applicable;
- i. Discussion of medications students are currently taking and their possible side effects;
- j. Transportation safety (for staff with transportation-related job responsibilities); and
- k. Student record policies and confidentiality issues.

The following additional topics are required in-service training topics and must be provided annually to all teaching staff:

1. How the learning standards of the Massachusetts Curriculum Frameworks are incorporated into the program's instruction and m. Procedures for inclusion of all students in MCAS testing and/or alternate assessments.

#### **Legal Standards**

28.09(7)(f); 28.09(9)(b); 28.09(10); 18.05(11)(h) 18.03(3); 18.05(9)(e)(1); 18.05(10); 18.05(11)(h) Title VI: 42 U.S.C. 2000d; 34 CFR 100.3; EEOA: 20 U.S.C. 1703(f); Title IX: 20 U.S.C. 1681; 34 CFR 106.31-106.42; M.G.L. c. 76, § 5; 603 CMR 26.00

# **Confirmed Findings**

Applies To	Rating	Response Required	Finding Description
BC Campus School Day Program	Partially Implemented	Yes	While staff interviews indicated that all staff completed all mandated new hire and annual DESE trainings, a review of staff records indicated that documentation was not consistently evident to show that all staff received all of the DESE mandated new hire and annual trainings as required.



# BOSTON COLLEGE CAMPUS SCHOOL BC Campus School Day Program

an approved private special education program operated pursuant to 603 CMR 18.00, 28.09, and 46.00 is granted

# **Full Approval**

This approval status expires on August 31, 2027 and is a result of a Program Review conducted in the 2024-2025 school year. The next expected Mid Cycle Review will be conducted in the 2027-2028 school year.

# **Program-Specific Information**

Main Address: Campion Hall, 140 Commonwealth Ave, Chestnut

Hill,MA,US,02467

**Program Type:** Day Program

**Number of Months in Session:** 11 months

**Approved Student: Licensed Educator Ratio:** 6:1

**Approved Student: Licensed Educator: Aide Ratio:** 10:1:3

**Program Rate Based on:** 42 students

**DESE Approved Student Enrollment:** 42 students

**Issued by the Office of Approved Special Education Schools:** 

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Date Issued: November 07, 2024