



Marblehead Public Schools

Tiered Focused Monitoring Report

Continuous Improvement and Monitoring Plan

For Group B Universal Standards
Tier Level 2

Dates of Onsite Visit: February 1-2, 2021

Date of Final Report: May 24, 2021



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Commissioner of Elementary and Secondary Education

During the 2020-2021 school year, Marblehead 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/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 Marblehead Public Schools included:

Self-Assessment Phase:

- The district reviewed special education and civil rights documentation for required elements including document uploads.
- 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 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.
- 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.

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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.

Marblehead Public Schools

SUMMARY OF COMPLIANCE CRITERIA RATINGS

	Universal Standards Special Education	Universal Standards Civil Rights and Other General Education Requirements
IMPLEMENTED	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 8, CR 10B, CR 12A, CR 16, CR 17A, CR 20, CR 21, CR 22, CR 23
PARTIALLY IMPLEMENTED		CR 10A, CR 10C, CR 24, CR 25
NOT IMPLEMENTED		
NOT APPLICABLE		

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 10A - Student handbooks and codes of conduct
Rating: Partially Implemented
Description of Current Issue: A review of documents and administrative interviews indicated that the procedures for the discipline of students with disabilities, as published in the parent and student handbook, do not address the procedural requirements applied to students not yet determined to be eligible for special education, including procedures to conduct an expedited evaluation to determine eligibility.
LEA Outcome: The Marblehead Public Schools will ensure that both online and hardcopy code of conduct and student handbooks detail the procedural requirements applied to students not yet determined to be eligible for special education consistent with 34 CFR 300.534, including procedures to conduct an expedited evaluation to determine eligibility.
<p>Action Plan: Marblehead Public Schools will review and revise the code of conduct and handbook procedures for the discipline of students with disabilities and students with Section 504 Accommodation Plans to include procedural requirements applied to students not yet determined to be eligible for special education.</p> <p>By September 30, 2021, Marblehead Public Schools will submit a link to the revised code of conduct/handbooks on the district's web site.</p> <p>By September 30, 2021, Marblehead Public Schools will provide evidence that all staff have been trained on changes to the code of conduct and handbooks.</p>
<p>Success Metric: Marblehead Public Schools will publicly post and make available the revised procedures for the discipline of students with disabilities and students with Section 504 Accommodation Plans. These revised procedures will also be translated for those students/families, as needed. Specific reference to the updated language will be included in the annual mandatory trainings required for all faculty and staff.</p> <p>Evidence:</p> <p>*Links to updated student handbooks posted on the website (available in hardcopy, as needed) containing the procedural requirements applied to students not yet determined to be eligible for special education, including procedures to conduct an expedited evaluation to determine eligibility</p> <p>*Staff training agenda/memorandum to staff</p>
<p>Measurement Mechanism: Continuing after the completion deadline:</p> <p>All student handbooks containing the student code of conduct will be reviewed annually to ensure full compliance for public release and posted no later than September 30th of each school year.</p>
Completion Timeframe: 09/30/2021

Improvement Area 2
Criterion: CR 10C - Student Discipline
Rating: Partially Implemented
Description of Current Issue: A review of documents and administrative interviews indicated that the district has not developed a system for periodic review of discipline data by principals to assess the extent of the use of suspensions, determine its impact on the removal and exclusion of selected student sub-groups, and make adjustments, as necessary, to address over-reliance on suspensions and expulsions.
LEA Outcome: Marblehead Public Schools will develop a system for periodic review of discipline data by principals to assess the extent of the use of suspension, determine its impact on the removal and exclusion of selected student sub-groups, and make adjustments as necessary to address over-reliance on suspensions and expulsions.
<p>Action Plan: Marblehead Public Schools will assess current monthly practices by principals and designated building administrators to review discipline data by student sub-groups. Principals and/or their designee at each level will gather discipline data for the purpose of identifying disproportionate use of discipline related to any sub-group, assess what the data revealed about the extent of the use of suspension in their school, and determine the impact that disciplinary practices have on the removal and exclusion of selected student sub-groups. Appropriate adjustments and alternate supports and services will be identified and implemented to ensure equity for all students.</p> <p>By September 30, 2021, Marblehead Public Schools will submit a description of its system for periodic review of discipline data by principals, including timelines, specific sub-groups, and the data platform for disaggregating data.</p> <p>By January 24, 2021, Marblehead Public Schools will submit examples of discipline data analyzed by sub-group, along with a narrative and action plan, as needed.</p>
<p>Success Metric: Marblehead Public Schools will maintain monthly reports of each school's student discipline data with summarized trend and/or pattern analysis by student sub-group to determine if any group is disproportionately impacted by suspension or exclusion. Marblehead Public Schools will make appropriate adjustments and create alternate supports and services to address possible over-reliance on suspensions and expulsions.</p> <p>Evidence:</p> <ul style="list-style-type: none"> * Description of school-level system for periodic review of discipline data * Agendas from administrative meeting * Sub-groups for data tracking * Summaries and analysis of discipline data * Any adjustments to practice addressing over-reliance on suspensions and expulsions and the impact on one or more student sub-groups compared with others
Measurement Mechanism: Continuing after the completion deadline:

Improvement Area 2

Principals, along with designated building team members, will meet monthly to review discipline data to assess the extent of the use of suspension, determine its impact on the removal and exclusion of selected student sub-groups, and make adjustments as necessary to address over-reliance on suspensions and expulsions.

Completion Timeframe: 01/24/2022

Improvement Area 3
Criterion: CR 24 - Curriculum review
Rating: Partially Implemented
Description of Current Issue: A review of documents and administrative interviews indicated that although the district has a curriculum review process, the district has not trained all teachers on this process to review 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.
LEA Outcome: Marblehead Public Schools will ensure individual teachers participate in annual training/re-training and subsequently engage in systematic review of curriculum and instructional materials at all levels for purposes of identifying and addressing issues related to implicit bias and demeaning stereotypes. The training will include examples of appropriate activities, discussions and/or supplementary materials so students leave lessons with context and a balanced perspective for any bias or stereotypes depicted in such materials.
<p>Action Plan: Marblehead Public Schools' Equity Task Force will identify curriculum leaders for each building to create protocols and user-friendly review guides for examining all instructional materials, including supplementary materials and discussion topics. At the building level, principals and curriculum leaders will coordinate the subsequent training of teaching staff in use of the equity and anti-bias protocols. The principals will support teachers with the implementation of the protocols, including the use of supplementary materials and discussions during common planning meetings.</p> <p>By September 30, 2021, Marblehead Public Schools will submit its curriculum and instructional materials review protocols, along with evidence of teacher training on the use of the equity and anti-bias review process, to support a district-wide, systematic approach to the review of all educational materials, including textbooks, videos, online resources, and teacher generated content, as well as the process for adding supplementary materials and discussion to ensure context and a balanced perspective.</p> <p>By January 24, 2022, Marblehead Public Schools will submit samples of the curriculum review from each building, including representative samples of a variety of materials, such as textbooks, videos, online resources and teacher generated content with examples of supplementary materials and discussion topics for context and balanced perspectives.</p>
<p>Success Metric: Each building will use the equity and anti-bias protocols annually to review all new curriculum. Teachers will consistently use the equity and anti-bias protocols to evaluate all educational materials for evidence of implicit bias and simplistic and demeaning generalizations.</p> <p>Evidence:</p> <ul style="list-style-type: none"> * Curriculum and instructional materials review protocols * Training materials and sign-in sheets for the equity and anti-bias teacher training sessions * Samples of completed curriculum review sheets with examples of supplementary materials or discussion topics for each level (preschool, elementary, middle and secondary) * Any follow-up taken to ensure equity will be noted and referred to the Assistant Superintendent for action.

Improvement Area 3**Measurement Mechanism:** Continuing after the completion deadline:

Marblehead Public Schools' Equity Task Force and building principals will ensure that teachers use the curriculum review process to review all instructional materials for evidence of implicit bias and simplistic and demeaning generalizations on the basis of race, color, sex, gender identity, religion, national origin and sexual orientation. Each building principal will maintain a record of annual training for new staff, as well as the re-orientation of all staff, on the use of the identified equity curriculum review protocols. Any follow-up taken to ensure equity will be noted and referred to the Assistant Superintendent for action.

Completion Timeframe: 01/24/2022

Improvement Area 4
Criterion: CR 25 - Institutional self-evaluation
Rating: Partially Implemented
Description of Current Issue: A review of documents and administrative 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: Marblehead Public Schools will evaluate its K-12 academic, athletic, and extracurricular 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.
<p>Action Plan: By September 30, 2021, Marblehead Public Schools' Equity Task Force will submit its annual self-evaluation and review process, including what data and documents to review; instruments (surveys, focus groups, equity walks) to collect student, parent, staff and administrator input; and the estimated annual timeline for collecting, reviewing and analyzing the results.</p> <p>By January 24, 2022, Marblehead Public Schools will submit a summary of its results, along with an action plan to address any inequities and barriers within policies and procedures that limit student access and participation identified during the process.</p>
<p>Success Metric: Marblehead Public Schools will annually evaluate its K-12 academic, athletic, and extracurricular 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.</p> <p>Evidence:</p> <ul style="list-style-type: none"> *Task Force membership by name, role and school, along with proposed meeting dates *Description of the annual review process, including data to be reviewed, instruments to be used, timeline for annual implementation, completion timeline, and posting and disseminating results. *Summary of results and action plan
<p>Measurement Mechanism: Continuing after the completion deadline:</p> <p>Each fall, the Task Force will examine the annual review process and revise as needed. No later than spring of each year, the Task Force will implement the selected review instruments, analyze the data collected, and develop an action plan to address any inequities found. By the end of each school year, the Task Force will post the results of the institutional review on the district's website with recommended actions to address any inequities found based on race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status.</p>
Completion Timeframe: 01/24/2022