



Jeffrey C. Riley
Commissioner

Massachusetts Department of Elementary and Secondary Education

75 Pleasant Street, Malden, Massachusetts 02148-4906

Telephone: (781) 338-3000
TTY: N.E.T. Relay 1-800-439-2370

June 27, 2019

Andy Pond
President and CEO
Justice Resource Institute, Inc.
160 Gould Street
Needham, MA 02494

Re: Approved Special Education Schools Mid-cycle Review and Verification of previous
Program Review Corrective Action Plan
A - Berkshire Meadows
B - Meadowridge Academy
C - Pelham Academy
D - Swansea Wood School
E - Glenhaven Academy
F - Walden Street School
G - Anchor Academy
I - The Victor School
K - Bay Cove Academy Day Program
M - Granite Academy Day Program
N - JRI Meadowridge Littleton Academy Campus

Dear Mr. Pond:

Enclosed is the Department of Elementary and Secondary Education's ("Department") Approved Special Education Schools Mid-cycle Review Report based upon the Mid-cycle Review conducted in your approved special education school programs in January, February, March, and April of 2019.

This report includes the Department's findings regarding the implementation status and effectiveness of corrective steps taken in response to your previous Program Review Report issued on August 3, 2016. This report also includes detailed findings describing the determination of the Department about the implementation status of selected Mid-cycle review criteria as well as the implementation of new state or federal special education requirements enacted since your programs' last Program Review.

Please note that all programs must demonstrate 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 Mid-cycle Review Report.

At this time, the Department requests that you upload a written assurance signed by you and the chairperson of your Board of Directors. This statement must contain:

- a. a description of the steps the programs are taking to make the Department's findings available to staff, parent advisory groups and the general public; and
- b. an assurance that your programs will implement the corrective action ordered by the Department within the required timelines.

Please go into the WBMS and upload your program's written assurance into Additional Documents no later than **July 12, 2019**. You can do this by accessing: > MCR > Self-Assessment > Additional Documents.

The Department will notify you of your programs' next regularly scheduled Program Review several months before it is to occur. At this time, we anticipate the next routine monitoring visit to occur sometime during the 2021-2022 school year, unless the Department determines that there is some reason to schedule this visit earlier.

The following programs are being issued full approval and are enclosed with this correspondence: Berkshire Meadows, Meadowridge Residential Programs, The Victor School, Anchor Academy, and Granite Academy. These approvals shall remain in effect until August 31, 2022, and will be contingent upon continued compliance with all regulations contained within 603 CMR 28.00 "Special 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 46.00 "Prevention of Physical Restraint and Requirements If Used." The Department may change this approval status at any point during this three-year period if circumstances arise that warrant such a change.

While the Department found certain noncompliance issues to be resolved, others were partially corrected, or new issues were identified by the Department's onsite team at Bay Cove Academy. Therefore, the Department is issuing a "Provisional Approval" status effective from the date of this letter as indicated on the attached approval certificate and will expire on December 18, 2019. The reasons for the "Provisional Approval" are indicated on the attached Mid-cycle Review Report.

As the Department previously informed you, in cases where programs fail to fully and effectively implement a Corrective Action Plan from the last program review which was proposed by the program and approved by the Department, the Department must then order a Corrective Action Plan for the program which must be implemented without further delay. You will find these requirements for corrective action and further progress reporting included in the

attached report, together with any steps that must be taken by the program to fully implement special education requirements. Please provide the Department with your written assurance that the Department's requirements for corrective action will be implemented by your program within the timelines specified. Your statement of assurance must be uploaded into the Web Based Monitoring System (WBMS) by **July 12, 2019**.

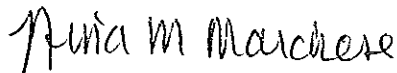
Please be advised that the attached Department Approval Certificates must be conspicuously posted in a public place within the program as required by 603 CMR 28.09.

In closing, we would like to extend our thanks to the administration and staff who shared their time and thoughts so generously during the preparation and onsite phases of the visit. Should you require any additional information, please do not hesitate to contact Karen Brann at 781-338-3748.

Sincerely,



Karen Brann, Mid-cycle Review Chairperson
Office of Approved Special Education Schools



Nina M. Marchese, M.Ed., Director
Office of Approved Special Education Schools

cc: Lindsay Savageau, Superintendent of Day Schools
Elizabeth Carrigan, Division Director
Jeffrey C. Riley, Commissioner of Elementary and Secondary Education
Russell Johnston, Ph.D., Senior Associate Commissioner
Joanne K. Morris, Supervisor, Office of Approved Special Education Schools

Encl.: Mid-cycle Review Report
Full Approval Certificate, Expiration Date: August 31, 2022
Berkshire Meadows
Meadowridge Academy
Pelham Academy
Swansea Wood School
Glenhaven Academy
Walden Street School
Anchor Academy
The Victor School
Granite Academy Day Program
JRI Meadowridge Littleton Academy Campus
Provisional Approval Certificate, Expiration Date: December 18, 2019
Bay Cove Academy Day Program



MASSACHUSETTS DEPARTMENT OF
ELEMENTARY AND SECONDARY
EDUCATION

MID-CYCLE REVIEW REPORT

Justice Resource Institute, Inc.

MCR Onsite Dates: 01/31/2019 - 04/05/2019

Programs under review for the agency:

A - Berkshire Meadows

B - Meadowridge Academy

C - Pelham Academy

D - Swansea Wood School

E - Glenhaven Academy

F - Walden Street School

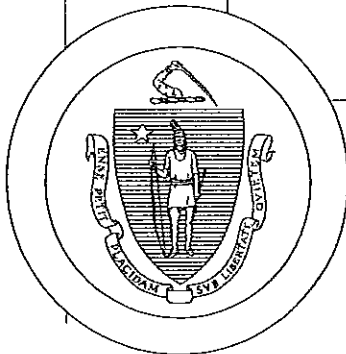
G - Anchor Academy

I - The Victor School

K - Bay Cove Academy Day Program

M - Granite Academy Day Program

N - JRI Meadowridge Littleton Academy Campus



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Commissioner of Elementary and Secondary Education

MID-CYCLE REVIEW REPORT

PS Criterion #2.2 - Approvals, Licenses, Certificates of Inspection

Rating: Implemented
Applies To: All
Basis for Findings: A review of documentation and observations indicated that there were current approvals, licenses and certificates of inspection from appropriate local authorities for all buildings used by the students.

PS Criterion #2.3 - EEC Licensure (Residential Programs Only)

Rating: Implemented
Applies To: A - JRI Berkshire Meadows Program, B - JRI Meadowridge Academy Campus, C - JRI Meadowridge Pelham Academy Campus, D - JRI Meadowridge Swansea Wood Campus, E - JRI Meadowridge van der Kolk Center, Glenhaven Academy Campus, F - JRI Meadowridge Walden Street Campus, N - JRI Meadowridge Littleton Academy Campus
Basis for Findings: A review of documentation and observations indicated that there was a current license from the Department of Early Education and Care for all residential facilities.

PS Criterion #4.5 - Immediate Notification

Rating: Implemented
Applies To: All
Basis for Findings: A review of documentation and student records indicated that the policy on Immediate Notification Regarding Serious Incidents met the current requirements and included notification to appropriate parties of such incidents, as well as the person responsible for oversight. A review of student records showed that the program maintains copies of all incidents regarding students.

PS Criterion #6.1 - Daily Instructional Hours/6.4 School Days Per Year

Rating: Implemented
Applies To: All
Basis for Findings: A review of documentation indicated that all students were scheduled to receive the required number of instructional hours per year, and that the required number of school days per year was scheduled for all students.

PS Criterion #8.5 - Current IEP & Student Roster

Rating: Implemented
Applies To: All
Basis for Findings: A review of documentation and review of student records indicated that there was a current Individualized Education Program (IEP) for each enrolled Massachusetts student that had been issued by the responsible public school district and consented to by the student's parent or the student, when applicable. In student records where an IEP was found not to be current, there was documentation of the program's efforts to obtain a current IEP from the responsible school district.

PS Criterion #9.1 - Policies and Procedure for Behavior Support

Rating: Implemented
Applies To: All
Basis for Findings: A review of documentation and staff interviews indicated that the program has developed and is implementing written Policies and Procedures for Behavior Support consistent with the regulations under 603 CMR 46.00 regarding appropriate responses to student behavior that may require immediate intervention. Behavior Support Policies and Procedures are reviewed annually, and are provided to staff annually and made available to parents of enrolled students.

PS Criterion #9.1(a) - Student Separation Resulting from Behavior Support

Rating: Implemented
Applies To: A - JRI Berkshire Meadows Program, B - JRI Meadowridge Academy Campus, C - JRI Meadowridge Pelham Academy Campus, D - JRI Meadowridge Swansea Wood Campus, E - JRI Meadowridge van der Kolk Center, Glenhaven Academy Campus, F - JRI Meadowridge Walden Street Campus, G - JRI Anchor Academy Day Program - Middleborough, I - JRI The Victor School Program, M - JRI Granite Academy Day Program, N - JRI Meadowridge Littleton Academy Campus
Basis for Findings: A review of documentation and staff interviews indicated that the policies and procedures regarding Student Separation Resulting from Behavior Support include that a student must be continuously observed by a staff member at all times, that staff shall be with the student or immediately available to the student at all times, that procedures are in place for obtaining principal approval of the student separation for more than 30 minutes based upon the student's continuing agitation, and that student separation shall cease as soon as the student has calmed.

PS Criterion #9.1(a) - Student Separation Resulting from Behavior Support

Rating: Not Implemented			
Applies To: K - JRI Bay Cove Academy Day Program			
Basis for Findings: A review of documentation indicated that the Policies and Procedures regarding Student Separation Resulting from Behavior Support included requirements that a student must be continuously observed by a staff member at all times, that staff shall be with the student or immediately available to the student at all times, that procedures are in place for obtaining principal approval for a student separation lasting more than 30 minutes, based upon the student's continuing agitation, and that student separation shall cease as soon as the student has calmed. However, student record review, observation and staff interviews indicated that not all students are continuously observed, and extended time-outs do not cease as soon as the student has calmed.			
Department Order of Corrective Action: Bay Cove Academy must update procedures on this policy, particularly around documenting the use of the multiple spaces used for student separation and must train staff on the revised procedures.			
Required Elements of Progress Reports: By June 26, 2019, Bay Cove Academy must submit procedures for documenting student separation (including any forms used to do so, such as a student separation log) for the various "Taking Space" opportunities used by the program to support student behavior. Procedures must include, at a minimum: 1) type of separation and location; 2) student's name; 3) the date, time and duration of the separation; 4) reasons for the intervention; 5) name(s) of staff who observed student; 6) name and role of the person who approved the procedure; and 7) name and role of person who directly observed the student. Following Department approval of the procedures for documenting student separation, Bay Cove Academy must provide evidence of training for all staff by submitting 1) the name and job title of the person conducting the training; 2) the dates and times when this training was held; 3) the length of time allotted for the training; 4) a list of all staff in alphabetical order by last name with their position title; 5) the date and time each staff received this training; and 6) for any staff who did not receive the training, the reason why and when their training is scheduled.			
Progress Report Due Date(s):			
07/26/2019	09/06/2019		

PS Criterion #9.4 - Physical Restraint

Rating: Implemented
Applies To: All
Basis for Findings: A review of documentation and staff interviews indicated that the program administers physical restraints only in emergency situations of last resort when needed to protect a student and/or a member of the school community from assault or imminent, serious, physical harm and with extreme caution in order to prevent or minimize any harm to the student as a result of the use of physical restraint. Documentation, a review of student records, and staff interviews indicated that Physical Restraint Policies and Procedures were consistent with requirements under 603 CMR 46.00.

PS Criterion #11.3 - Educational Administrator Qualifications

Rating: Implemented
Applies To: All
Basis for Findings: A review of documentation indicated that the Educational Administrator possessed the required qualifications to serve in this position.

PS Criterion #11.4 - Teachers (Special Education Teachers and General Education Teachers)

Rating: Implemented
Applies To: All
Basis for Findings: A review of documentation indicated that the teaching staff were appropriately licensed or had been granted an appropriate waiver for the 2018-2019 school year.

PS Criterion #11.5 - Related Services Staff

Rating: Implemented
Applies To: All
Basis for Findings: A review of documentation indicated that the staff providing or supervising the provision of related services were appropriately certified, licensed or registered in their professional areas.

PS Criterion #11.6 - Master Staff Roster

Rating: Implemented
Applies To: All
Basis for Findings: A review of documentation indicated that at the time of the Mid-Cycle Review, the Master Staff Roster contained the names, program job titles, corresponding Uniform Financial Report (UFR) title numbers and full-time equivalents (FTE) for all staff. The Master Staff Roster also accurately corresponded to the most recently approved DESE staffing plan.