



MASSACHUSETTS

**Department of Elementary
and Secondary Education**

Bi-County Collaborative (BICO)

**Adult Transition Program
Alternative Middle School
Elementary Developmental Learning Program (EDLP)
Learning Center
Life Roles Education Program @ Bellingham
Life Roles Transition Center @ Walpole (18+)
Life Roles Transition Center @ Walpole (9-12)
Preschool Developmental Learning Program (PDLP)
SEAP-Bellingham
SEAP-Wood School
Secondary Therapeutic Alternative High School
Therapeutic Essential Skills Program (TESP)
Summit Elementary Learning Center
Summit High School
Summit Middle School
Therapeutic Education Program
Specialized Middle Alternative Program (SMAP)
Therapeutic Elementary Alternative Program @ Jackson School
Therapeutic Elementary Alternative Program @ Wood School
Therapeutic Elementary Alternative Program @ Wrentham**

Program Review Report

**Week of Onsite Visit: May 26, 2025
Draft Report Issued: June 20, 2025
Final Report Issued: August 08, 2025
Corrective Action Plan Due: September 08, 2025**

**Department of Elementary and Secondary Education Onsite Team Members:
Lynda Womack, Chairperson
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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 collaborative and approved public day school programs 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 collaborative and approved public day school programs to verify the implementation of these programs. In the spring of the previous school year, the schools participating in 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 Collaborative Program Review cycle together with the Department's Mid-cycle monitoring schedule is posted on the Department's Website at <https://www.doe.mass.edu/oases/crs/6yrcycle.html>.

SCOPE OF COLLABORATIVE PROGRAM REVIEW

The Office of Approved Special Education Schools of the Massachusetts Department of Elementary and Secondary Education oversees compliance with education requirements through its Collaborative Program Review System (PR), private special education school program reviews, as well as reviews of certain Special Education in Institutional Schools Settings programs. The collaborative reviews cover selected requirements in the following areas: Special Education (CSE)

- Selected requirements from the federal Individuals with Disabilities Education Act (IDEA); 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 27, 2018.

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

- 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).
- Selected requirements governing bullying prevention and intervention under M.G.L. c. 71 § 37H, as amended by Chapter 92 of the Acts of 2010, and as amended by sections 72-74 of the Acts of 2013; M.G.L. c. 71, §37O.
- Various requirements under other federal and state laws.

Approved Public Day Program Standards (APD) (where applicable)

- Selected requirements from the Massachusetts Board of Elementary and Secondary Education Special Education regulations from 603 CMR 28.09.
- Selected requirements from the Massachusetts Program and Safety Standards for Approved Public or Private Day and Residential Special Education School Programs 603 CMR 18.00

The report includes findings in the program areas reviewed organized under three components: Special Education Legal Standards, Civil Rights: Methods of Administration and Other Related General Education Requirements and Approved Public Day Program Standards.

The findings in each area explain the "ratings," determinations by the team about the implementation status of the criteria reviewed. The ratings indicate those criteria that were found by the team to be substantially "Implemented". (Refer to the "Definition of Compliance Ratings" section of the report.) Where criteria were found to be either "Partially Implemented," "Implementation in Progress," or "Not Implemented," the collaborative must propose to the Department corrective actions to bring those areas into compliance with the controlling statute or regulation. The collaborative is expected to incorporate the corrective action into their professional development plans.

Collaborative Program Review Elements

Criteria: The Collaborative Program Review criteria encompass key elements drawn from 603 CMR 18.00, 28.09, 46.00 and the approved public day 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.

Data Collection Phase: This is a requirement for all collaborative programs being monitored. It is completed for the onsite review and covers all of the Department selected criteria. The collaborative is responsible for completing the Self- Assessment for each individual program being reviewed, which consists of:

- Collaborative review of policies and procedures,
- Collaborative review of student documentation including a sample of student records.
- Collaborative review of facilities, buildings, and grounds.

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

Desk Review Phase: The OASES chairperson assigned to each collaborative reviews the responses by the collaborative 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 documents, student 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 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: The Department selects a sample of student records from those the collaborative 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 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 collaborative'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 collaborative program must propose to the Department corrective action to bring into compliance with the required statute or regulation 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 program's implementation methods that also may require response from the collaborative. **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 two-member team conducted a visit to Bi-County Collaborative (BICO) during the week of May 26, 2025 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 7 leadership staff;
- Interviews of 6 related services staff;
- Interviews of 10 teaching staff; and
- Interviews of 7 direct care staff.
- Student record review: A sample of 34 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.
- 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
APD 4.2 Public Information and Postings	All				
APD 9.1 (a) Student Separation Resulting from Behavior Support	All				
CCR 7A School year schedules	All				
CCR 9 Hiring and employment practices of prospective employers of students	All				
CCR 10C Student Discipline	All				
CCR 11A Designation of coordinator(s); grievance procedures	All				
CCR 14 Counseling and counseling materials free from bias and stereotypes	All				
CCR 24 Curriculum	All				

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Staff Documentation					
Criteria	Implemented	Implemented Response Required	Implementation In Progress	Partially Implemented	Not Implemented
APD 12.2 In-service Training Plan and Calendar	All				
APD 16.3 Nursing	All				
CCR 18A Collaborative employment practices	All				
CCR 21 Staff training regarding civil rights responsibilities	All				
CSE 51 Appropriate Special Education Teacher Licensure	All				
CSE 52 Appropriate certifications/licenses or other credentials-- related service providers	All				
CSE 52A Registration of educational interpreters	All				
CSE 53 Use of Paraprofessionals	All				
CSE 54 Professional Development	All				

Student Documentation					
Criteria	Implemented	Implemented Response Required	Implementation In Progress	Partially Implemented	Not Implemented
APD 4.5 Immediate Notification	All				
APD 15.5 Parent Consent and Required Notification	All				
CCR 10 Anti-Hazing Reports	All				
CCR 10B Bullying Prevention and Intervention	All				
CCR 17A Use of physical restraint on	All				

any student enrolled in a publicly-funded education program					
CCR 20 / CCR26A Staff training on confidentiality of student records/Confidentiality and student records	All				
CSE 13 Progress Reports and Content				Life Roles Transition Center @ Walpole (9-12);SEAP-Bellingham	
CSE 22 IEP implementation and availability				SEAP-Bellingham;SEAP-Wood School;Learning Center;Life Roles Transition Center @ Walpole (18+);Therapeutic Elementary Alternative Program @ Wood School;Alternative Middle School	
CSE 29 Communications are in English and Primary language of home	All				
CSE 40 Instructional grouping requirements for students aged five and older	All				
CSE 41 Age Span requirements	All				
CSE 46 Procedures for suspension of students with disabilities when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days; responsibilities of the Team; responsibilities of the district	All				

Buildings/Facilities					
Criteria	Implemented	Implemented Response Required	Implementation In Progress	Partially Implemented	Not Implemented
* APD 13.2 Description of Physical Facility	All				
CSE 55 Special Education Facilities and Classrooms	All				

*Criterion was not previously included in the standard review cycle, but was reviewed during the Onsite visit.

Student Documentation

CSE 13 Progress Reports and Content

Requirements

Progress reports and content

1. Parents receive reports on the student's progress towards reaching the goals set in the IEP at least as often as parents are informed of the progress of non-disabled students.
2. Progress report information sent to parents includes written information on the student's progress towards the annual goals in the IEP, including information on the extent to which such progress is sufficient to enable the child to achieve the goals by the end of the year.
3. Where a student's eligibility terminates because the student has graduated from secondary school or exceeded the age of eligibility, the collaborative provides the student with a summary of his or her academic achievement and functional performance, including recommendations on how to assist the student in meeting his or her postsecondary goals.
4. Copies of progress reports shall be maintained in student records, including documentation of persons or agencies receiving such reports.

Legal Standards

[603 CMR 28.07\(3\)](#) [34 CFR 300.305\(e\)\(3\)](#) [300.320\(a\)\(3\)](#)

Confirmed Findings

Applies To	Rating	Response Required	Finding Description
Life Roles Transition Center @ Walpole (9-12);SEAP-Bellingham	Partially Implemented	Yes	A review of student records and interviews indicated that some progress reports did not address all annual goals written in the IEP.

CSE 22 IEP implementation and availability

Requirements

IEP implementation and availability

1. Where the IEP of the student in need of special education has been accepted in whole or in part by that student's parent, the collaborative provides the mutually agreed upon services without delay.
2. At the beginning of each school year, the collaborative has a current IEP for each enrolled Massachusetts student that has been issued by the responsible public school district and consented to and dated by the student's parent(s) (or the student, when applicable).
3. Each teacher and provider described in the IEP is informed of his or her specific responsibilities related to the implementation of the student's IEP and the specific accommodations, modifications, and supports that must be provided for the student under it.
4. The collaborative does not delay implementation of the IEP due to lack of classroom space or personnel, provides as many of the services on the accepted IEP as possible and immediately informs the responsible school district and parents in writing of any delayed services, reasons for delay, actions that the collaborative is taking to address the lack of space or personnel and offers alternative methods to meet the goals on the accepted IEP. Upon agreement of the responsible school district and parents, the collaborative implements alternative methods immediately until the lack of space or personnel issues are resolved.

Legal Standards

[603 CMR 28.05\(7\)\(b\)](#) [28.06\(2\)\(d\)\(2\)](#) [34 CFR 300.323](#)

Confirmed Findings

Applies To	Rating	Response Required	Finding Description

SEAP-Bellingham;SEAP-Wood School;Learning Center;Life Roles Transition Center @ Walpole (18+);Therapeutic Elementary Alternative Program @ Wood School;Alternative Middle School	Partially Implemented	Yes	A review of documentation and student records indicated that not all IEPs issued by the responsible public school district for each enrolled Massachusetts student were consented to by the student's parent or the student, when applicable, and there was not consistent documentation of the program's efforts to obtain it.
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