



# 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

Jeffrey C. Riley  
Commissioner

May 2, 2022

Dr. Sara Ahern, Superintendent  
Franklin Public Schools  
355 East Central Street  
Franklin, MA 02038

Re: Tiered Focused Monitoring Report for Special Education and Civil Rights

Dear Superintendent Ahern:

The Office of Public School Monitoring recently conducted a Tier 2 Tiered Focused Monitoring (TFM) Review in your district. During this review, the Department monitored selected special education and civil rights criteria to determine your district's compliance with laws and regulations.

We are pleased to tell you that the Department has found your district to be in compliance with all of the criteria monitored during the TFM Review and no corrective action is required at this time.

Enclosed you will find a copy of the Tiered Focused Monitoring Report. To access the report on the Department's website, please visit <http://www.doe.mass.edu> and select *Security Portal* then *PQA WebMonitoring*. Continue by selecting *Home > PSM Tier Review > Feedback/CIMP > View TFM Report*.

The Tiered Focused Monitoring Toolkit, which includes the regulatory requirements specific to the special education and civil rights criteria referenced in this report, can be found at <http://www.doe.mass.edu/psm/resources/default.html>.

In closing, we would like to thank the administration and staff who shared their time and thoughts so generously during the preparation and onsite phases of the review, and we commend you on your commitment and diligence in the areas reviewed under TFM. Special thanks are given to Paula Marano for coordinating this visit for the district. Should you need any additional information or assistance, please do not hesitate to contact Michelle Hennessy-Kowalczyk at (781) 338-3704.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle Hennessy-Kowalczyk".

Michelle Hennessy-Kowalczyk  
Tiered Focused Monitoring Review Chairperson  
Office of Public School Monitoring

A handwritten signature in black ink, appearing to read "Amy Paulin".

Amy Paulin, Assistant Director  
Office of Public School Monitoring

cc: Denise Spencer, School Committee Chairperson  
Paula Marano, Local Monitoring Review Coordinator



**Franklin Public Schools**

**Tiered Focused Monitoring Report**

**For Group A Universal Standards  
Tier Level 2**

**Dates of Onsite Visit: March 28-29, 2022**

**Date of Final Report: May 2, 2022**



Jeffrey C. Riley  
Commissioner of Elementary and Secondary Education

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

**Franklin Public Schools**

**REPORT INTRODUCTION.....3**

**TIERED FOCUSED MONITORING FINAL REPORT.....6**

**DEFINITION OF COMPLIANCE RATINGS .....7**

**SUMMARY OF COMPLIANCE RATINGS.....8**

**SUMMARY OF INDICATOR DATA REVIEW.....9**

## MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION REPORT INTRODUCTION

During the 2021-2022 school year, Franklin 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. **The Department is pleased to report that the district was found to be in compliance with all criteria reviewed; no corrective action is required at this time.**

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 effective March 1, 2007.

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

---

Template Version 120621

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.

**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	Level of Risk
1	Self-Directed Improvement	Data points indicate no concern on compliance and student outcomes.	Meets requirements
2	Directed Improvement	No demonstrated risk in areas with close link to student outcomes.	Low
3	Corrective Action	Areas of concern include both compliance and student outcomes.	Moderate
4	Cross-unit Support and Corrective Action	Areas of concern have a profound effect on student outcomes and ongoing compliance.	High

For the 2021-2022 school year, the tier assignments are based on:

- 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 State Performance Plan/Annual Performance Reports (SPP/APR) compliance Indicator data for Indicators 11, 12, and 13 (Group A only)
  - Indicator 11: Child Find
  - Indicator 12: Early Childhood Transition
  - Indicator 13: Secondary Transition
- Special education SPP/APR performance Indicator data for Indicators 5 & 6
  - Indicator 5: Education Environments (6-21)
  - Indicator 6: Preschool Environments
- Significant Disproportionality data 2019-2020 & 2020-2021

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.

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**

### **Franklin Public Schools**

The Massachusetts Department of Elementary and Secondary Education conducted a Tiered Focused Monitoring Review in Franklin Public Schools during the week of March 28, 2022, 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 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 selected across grade levels, disability categories, and levels of need.
- Upon completion of the self-assessment, the district submitted the data to the Department for review.

#### **On-site Phase:**

- Interviews of administrative staff consistent with those criteria selected for onsite verification.
- Interview of a parent advisory council (PAC) representative and other telephone interviews, as requested by other parents or members of the general public.
- 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 from the special education student roster. The onsite team conducted this review, using standard Department procedures, to determine whether procedural and programmatic requirements have been met.

## DEFINITION OF COMPLIANCE RATINGS

<b>Commendable</b>	Any requirement or aspect of a requirement implemented in an exemplary manner significantly beyond the requirements of law or regulation.
<b>Implemented</b>	The requirement is substantially met in all important aspects.
<b>Implementation in Progress</b>	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.
<b>Partially Implemented</b>	The requirement, in one or several important aspects, is not entirely met.
<b>Not Implemented</b>	The requirement is totally or substantially not met.
<b>Not Applicable</b>	The requirement does not apply to the school district or charter school.



## Franklin Public Schools

### SUMMARY OF COMPLIANCE RATINGS

	Universal Standards Special Education	Universal Standards Civil Rights and Other General Education Requirements
<b>IMPLEMENTED</b>	SE 1, SE 2, SE 3, SE 3A, SE 6, SE 7, SE 8, SE 9, SE 9A, SE 10, SE 11, SE 12, SE 13, SE 14, SE 17, SE 18A, SE 19, SE 20, SE 22, SE 25, SE 26, SE 29, SE 34, SE 35, SE 37, SE 39, SE 40, SE 41, SE 42, SE 43, SE 48, SE 49	CR 13, CR 14, CR 18
<b>PARTIALLY IMPLEMENTED</b>	None	
<b>NOT IMPLEMENTED</b>	None	
<b>NOT APPLICABLE</b>	SE 38	

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>>.

## SUMMARY OF INDICATOR DATA REVIEW

As part of the self-assessment process for districts or charter schools undergoing a review for Group A Universal Standards, the PSM team reviewed the results of Indicator data submissions for Indicators 11, 12 and 13. The Indicator review is completed prior to the onsite visit and helps inform the scope of the onsite review. For any Indicator data noncompliance found, the district or charter school must develop and implement corrective action that includes correcting noncompliance for the individual students affected by it, addressing the root cause and underlying reasons for the identified noncompliance, and reviewing additional records as evidence that the issues have been corrected and that requirements are being met. The Office of Special Education Programs (OSEP) requires correction of noncompliance within one year of the finding.

The results of the Department's analysis regarding these Indicators are as follows:

	<b>Compliant</b>	<b>Non-Compliant</b>	<b>Not Applicable</b>
<b>Indicator 11 – Initial Evaluation Timelines</b>		X	
<b>Indicator 12 – Early Childhood Transition</b>	X		
<b>Indicator 13 – Secondary Transition</b>	X		

All corrective action related to the finding of non-compliance for Indicator 11 has been completed. No further action is required by the district.