

**Rhode Island Department of Education Office of Student, Community and Academic Supports** 

## **School Support System Report and Support Plan**

Ocean Tides December 2023

#### SCHOOL SUPPORT SYSTEM A Collaborative System of Cyclical Monitoring

**Introduction:** The School Support System (SSS) provides accountability for delivery of programs and services for students with disabilities. The School Support System model is designed to promote the involvement of the whole school district, general educators as well as special educators and parents. It is designed to learn if the district meets the regulations and what effects programs and services have on student outcomes. Finally, the SSS develops a school support plan for training and technical assistance. To accomplish this the SSS includes these components:

- <u>The Orientation Meeting</u>: The Rhode Island Department of Education (RIDE) staff meets the nonpublic special educaion school to plan the site review and identify issues or initiatives that may influence programs or service delivery.
- Data Analysis Meeting: The RIDE staff meets to review nonpublic special education demographic information on selected reports including: the state performance plan, census information, and information collected through record review, staff questionnaires and parent interviews. To ensure that the child is at the center of the study, all analyses begin with the child. Thus, a stratified random selection of students with IEPs is selected; the records of these students are reviewed; their parents/guardians, teachers and related service providers are interviewed, and their classes are observed. The result is an in-depth, unified examination of the actual provision of programs and services for students with exceptionalities. The RIDE staff compiles a preliminary summary of their analyses of this data.
- **Presentation by the LEA and School Site Review**: The on-site review begins with a presentation of programs by staff. The presentation provides the review team with general and specific information on delivery of programs and services to students. Following this presentation, on-site reviews of schools are made. The team members interview school administrators and teaching staff. Parents and central office staff are also interviewed. The team gathers data-based information and works with the LEA personnel to generate a report, covering the following:
  - $\circ$  The district's compliance with the state and federal regulations, relative to the education of students with disabilities.
  - $_{\odot}\,$  The quality and effectiveness of programs and services provided by the district.
  - The need for professional development and technical assistance that will enable the nonpublic special education school to improve programs and services.
- The Corrective Action/Support Plan: The RIDE team, and the nonpublic special educaion school meet to review the data and complete a report of results. The group designs a professional development/technical assistance corrective action/support plan with timelines for implementation and correction of any noncompliance. All findings of noncompliance must be corrected as soon as possible but no later than one year from the State's written notification of noncompliance. This plan enables the nonpublic school to correct areas of non-compliance and to strengthen promising programs and correct areas of weakness to improve services and programs for all students.
- The SSS Report: The report summarizes the findings from various data sources. The format of the report uses five divisions: Indictors, Findings, Noncompliance, and Corrective Action/Support Plan. Indicators describe either result or compliance in the topical areas of Free and Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE), Evaluation/Individual Educational Program (IEP) and IDEA Transition. The documentation is listed in both the Findings and Noncompliance sections of the report. The corrective action/support plan reflects the response to the described finding and actions by the district as well as resources and timelines to improve programs and services. All findings of noncompliance must be corrected as soon as possible but no later than one year from the State's written notification of noncompliance.
- Subsequent & Timely Follow / Verification Process & Reporting: RIDE, IDEA Quality Assurance personnel will work with nonpublic special educaion school to verify correction, including reviewing subsequent data to ensure correction of noncompliance. Also, within the one-year monitoring timeframe RIDE personnel will return to the nonpublic special educaion school and follow up to ensure ongoing compliance is maintained. This will include, as applicable, program spot checks/reviews and record reviews. Our baseline number of records will not go below six. Pending subsequent and timely verification, a letter closing the SSS monitoring process will be issued.

### SCHOOL SUPPORT SYSTEM A Collaborative System of Focused Monitoring

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### Nonpublic School School Support System Review

**RIDE Team Leaders** 

<u>Team A</u> – Susan Wood; Sandra Cambio Gregoire

# The RIDE, Office of Student, Community & Academic Supports School Support System process is facilitated to provide a means of accountability for delivery of programs and services to improve outcomes for students with disabilities. The following pages reflect the findings of that process.

#### 1. FREE APPROPRIATE PUBLIC EDUCATION IN THE LEAST RESTRICTIVE ENVIRONMENT (FAPE/LRE)

Item #	Review Information	Noncompliance Finding & Corrective Action / Support Plan (if applicable)
1	Nonpublic Special Education School Program Overview	Noncompliance Finding ( <i>if applicable</i> ):
	The Ocean Tides School is one school with two campuses. The <u>Narragansett campus</u> , the main campus, is a residential program	No finding.
	for males' grades seven through twelve, with a school component. The student body is comprised of Ocean Tides' residential students who are court ordered and referred by either the RI Court System or from the RI Training School/Division of Children, Youth & Families (DCYF).	Regulatory Citation: N/a
	The <u>Providence campus</u> is an alternative day school on a 9:00am- 3:00pm schedule, 180-days per year, for special education students, males only, in grades seven through twelve. The student body at this campus is comprised of students referred by their school district for	Corrective Action/ Support Plan: Timeline: N/a
	education purposes (both general education and special education).	
	The Ocean Tides School is accredited by the New England Association of Schools and Colleges (NEASC) and licensed by the Rhode Island Department of Education (RIDE) as a nonpublic special education	Progress Check: N/a
	school.	Follow Up Information:
	The Ocean Tides School offers Vocational Programming at both campuses. Students are involved in areas such as: Culinary Arts, Carpentry/Woodworking, Computer Programming, and Horticulture.	N/a
	Documentation: Data Analysis; Document Review; Observation	

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2	Student Support and Interventions	Noncompliance Finding ( <i>if applicable):</i>
	As students enter Ocean Tides, they are given STAR Assessments	
	through Renaissance Learning. The STAR Assessments provide the	No finding.
	data and insight to help educators identify student needs, plan	
	instruction, and measure growth. STAR Reading is a K-12	
	comprehensive reading assessment test with all the insights needed to	
	guide literacy growth. STAR Math is a math assessment that helps	
	increase math mastery with actionable insight into each student's skills	Regulatory Citation: N/a
	and subskills. Both the STAR Reading and STAR Math are	
	administered three times per year with approximate intervals of 90	
	days. The data results show that 75% of the students are below grade	
	level in math with 50% on a second to third grade math level. This	
	area will be the primary focus for staff professional development. Over	Corrective Action/ Support Plan:
	the past several years, Ocean Tides has focused on improving reading	
	scores. Ocean Tides would like to continue to have a secondary focus	Timeline: N/a
	in reading so all students will continue to show improvement. As of	
	now, the results from the PSAT, SAT, and RICAS have shown students	
	to be below grade level in the areas of both Reading and Math.	
	Ocean Tides provides Credit Recovery to students at both programs.	
	Ocean Tides recently purchased the program Edmentum to help	Progress Check: N/a
	alleviate the educational gap. By using credit recovery, it enables	
	students to be closer or at the age-appropriate grade level.	
	Clinical Services and Supports	Follow Up Information:
	Counseling and guidance are individualized to meet students' unique	
	needs and to ensure that functionally equivalent appropriate behaviors	N/a
	are instructed and reinforced. Counseling services are provided at the	
	Providence Campus via a school social worker (LICSW). This social	
	worker works with all students and their families. Communication with	
	the home setting ensures that parents are equipped with the same	
	positive behavior support strategies that the Ocean Tides faculty are	
	trained to employ with the students.	
	At the Narragansett campus, social service personnel under the	
	direction of the Director of Social Services (LICSW), individualize their	
	family sessions to focus on the unique goals and concerns of each	
	family. The social service workers meet weekly with each young man	
	and bi-monthly with each young man and his family.	
	Ocean Tides Narragansett Program has an After-Care program which follows those students that have finished their time as residents in a	
	Tollows those students that have thisned their time as residents in a	

six-month program that provides students with counseling, mentorship, and the ability to have someone to look over them. Staff also communicate with Family Court, other service providers, and DCYF. The program's goal is to help minimize the chance for recidivism and provide support to the student and family as they readjust to home and home school life.	
<b>Social Emotional Learning</b> Ocean Tides is utilizing CASEL's widely used framework which identifies five core competencies that are addressed in their IEPs: - Self-awareness: Working with students to know your strengths and limitations, with a well-grounded sense of confidence, optimism, and a "growth mindset." Self-management: Effectively manage stress, control impulses, and motivate yourself to set and achieve goals. Social awareness: Understand the perspectives of others and empathize with them, including those from diverse backgrounds and cultures. Relationship skills: Communicate clearly, listen well, cooperate with others, resist inappropriate social pressure, negotiate conflict constructively, and seek and offer help when needed. Responsible decision-making: Make constructive choices about personal behavior and social interactions based on ethical standards, safety, and social norms.	
The Narragansett Ocean Tides program has a mentor and mentee program set up within it. Each student is assigned a teacher/mentor that they work with throughout their time in the program. Each teacher has a maximum of three mentees. The goal is to create and improve connections between students, the school, and the instructors.	
Academic Interventions and Supports Ocean Tides provides Credit Recovery to students at both programs. Ocean Tides utilizes Edmentum to alleviate the educational gap. By using credit recovery, it enables students to be closer or at the age- appropriate grade level.	
School Removals/Disciplinary Policies	

Disciplinary policies and practices are clearly defined through the student/parent handbook.

	Documentation: Data Analysis; Document Review; Record Reviews	
3	Program Continuum	Noncompliance Finding ( <i>if applicable):</i>
	There are approximately 40 students between the Narragansett and	No finding.
	Providence campuses. The Narragansett campus (at the time of the	
	monitoring review) had four (4) students with IEPs. This number was	
	confirmed via the State's special education census. The Providence	
	campus had seventeen (17) students with IEPs. There is a full-time	Regulatory Citation: N/a
	special education teacher at each of the school campuses.	
	Students with IEPs are fully included in all core classes and various	
	content areas (i.e., wood shop, computers).	Ormer time Antique ( Ormer et Disco
	Students at the Narragansett have a transition meeting when ready to	Corrective Action/ Support Plan:
	return to district and home. Once the student leaves Narragansett	
	residential program, they return to their district and the district,	Timeline: N/a
	together with the family, decides the placement of the student.	
	The Ocean Tides School provides a curriculum with most students	
	taking a college preparatory and general education with vocational	Prograss Chacky N/2
	opportunities. Though Civics, English 9 and other courses are not	Progress Check: N/a
	leveled, they are taught at the college preparatory level. Much work	
	goes into baselining the students to their appropriate reading levels	
	and math levels and time is spent working to help them fill in many of	Follow Up Information:
	the educational gaps they have had over the course of their prior	Follow op Information.
	educational experiences.	N/a
	In addition to their high school diploma, students may earn certificates	
	through the Culinary Arts Program (Narragansett campus), Computer	
	Technology program and the Building/Construction Program. Ocean	
	Tides uses the Statewide Civics and Financial Management Curriculum.	
	Students participating in the career/technical areas may receive	
	certificates of achievement given to students each semester by the	
	instructor.	
	The Narragansett Ocean Tides program has a mentor and mentee	
	program set up within it. Each student is assigned a teacher/mentor	
	that they work with throughout their time in the program. Each	
	teacher has a maximum of three mentees. The goal is to create and	
	improve connections between students, the school, and the	
	instructors.	
	Documentation: Data Analysis; Document Review; Record Reviews	

4	Adaptive Physical Education (APE)	Noncompliance Finding ( <i>if applicable</i> ):
	To date, Ocean Tides does not have any students requiring adaptive physical education (APE). Ocean Tides currently employs two emergency certified Physical Education teachers; one in Narragansett (currently participating in a program through URI) and one in Providence who is newly emergency certified in this area. It should be noted that while Ocean Tides does not currently have any students in need of an evaluation for APE, Ocean Tides also does not have teachers certified as of the 2023-2024 school year to provide health to students as they are not certified in this area. However, as one can teach out of their area for 20% of their assignment, thus, both physical education teachers teach health.	No finding. <b>Regulatory Citation:</b> N/a <u>Corrective Action/Support Plan</u> : <b>Timeline:</b> N/a
	Documentation: Data Analysis; Document Review, Record Reviews	Progress Check: N/a
		Follow Up Information:
		N/a
5	<b>Extended School Year (ESY)</b> No current students from the Narragansett and the Providence campuses have qualified for ESY.	Noncompliance Finding ( <i>if applicable:</i> No finding.
	Ocean Tides does have a summer school program, entitled "5 <sup>th</sup> Quarter", for residential students at the Narragansett campus.	Regulatory Citation: N/a
	Documentation: Data Analysis; Document Review; Record Reviews	Corrective Action/Support Plan: Timeline: N/a
		Progress Check: N/a

		Follow Up Information:
		N/a
6	Parent Engagement         At all individual education program meetings, Ocean Tides discusses with the parents their right to attend and are encouraged to attend their individual communities LAC (Local Advisory Committee). Ocean Tides stresses the importance of getting the parents voice heard where it can have an impact and a place where shared concerns can be discussed and problem-solve common concerns. Ocean Tides provides the dates that each LAC meets and if available a contact person to find out about their purpose and to help them take the first step in getting involved.	No finding. No finding. Regulatory Citation: N/a
	Ocean Tides has four meetings a year called "Reflection Days" when report cards are distributed, award recognitions are given, and the success of the students is celebrated. The Providence campus chose not to have a Reflection Day this quarter. Ocean Tides Adaptation of National Standards for Family/School Partnerships:	Corrective Action/Support Plan: Timeline: N/a Progress Check: N/a
	<ol> <li>Welcoming all families: All families receive copies of the Parent Handbook and school calendar to keep informed of expectations and events.</li> <li>Communicating Effectively: Ocean Tides social service workers meet at least monthly with parents, IEP meetings, Reflection Day, Transition meetings, and weekly phone calls are made to the families by our social service workers.</li> <li>Supporting Student Success: Reflection Day at the end of each</li> </ol>	Follow Up Information: N/a
	<ul> <li>duarter is done to celebrate student accomplishments with every student recognized for their individual success through: Student of the week, point sheets, record of compliments, inclass supports, individual attention to all in need, use of technology, counseling, and guidance counseling.</li> <li>Speaking up for Every Child: Fully inclusive learning environment, Edmentum, to provide credit recovery or enrich learning experiences, reading fluency programs, science labs for more hands-on activities, building and construction,</li> </ul>	

<ul> <li>culinary, work study, internships and community-based learning.</li> <li>5. Sharing Power: Student Leadership-Student Council weekly group, School Improvement Team.</li> <li>6. Collaborating with the Community: Mentors for Senior Projects, internships with community businesses, community service performed by students, work study, work closely with LEAs (Local Education Agency).</li> </ul>
Documentation: Data Analysis; Document Review; Record Reviews

### 2. EVALUATION / INDIVIDUAL EDUCATION PROGRAM (IEP)

Item #	Review Information	Noncompliance Finding & Corrective Action / Support Plan (if applicable)
1	Records of 6 students were reviewed prior to the on-site review by the monitoring team leaders. Students' records were accessible. Narragansett records were well organized. Providence records were not organized at all, making it challenging to locate documents. The record review process identified by following <u>noncompliance findings</u> :	Noncompliance Finding (if applicable): Noncompliance Findings: Please note that the detailed list of any record review noncompliance including student names has been shared with Ocean Tides at the data analysis meeting. The details of those
	<ol> <li>General comment: The Providence campus has had challenges maintaining basic organized confidential files with original signatures and consent information (see item #2, #6 and #8 in this box as specific examples).</li> <li>Record SW1. There seems to have been a meeting on 3-1-22 to discuss the reevaluation results, as there is an attendance sheet and an evaluation report represented as one stapled document (pages 1-5). Yet further in the files there is a continuing document of that first document also stapled together (pages 8-10). Very</li> </ol>	<ul> <li>findings (without names) are shared in this report as well as follow-up requirements.</li> <li>Professional development/technical assistance will be provided to the special educators and any other staff as determined appropriate by the Special Education Director. Areas for professional development/technical assistance include understanding the IEP process, the use of the Power School platform, case manager</li> </ul>

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	3.	unorganized and unclear why they are separated and located in different places in the file or what document(s) were discussed and reviewed. (§300.303). IEP transition assessments were not seen in the file unless it was done by a school district. Record SW1 had the O'Shea and Star assessment scores listed as the assessment tools. Additionally, "Transition Services needed to help reach my post school goals " listed the Career Scope Inventory and the O'Net but none were	responsibilities and overall records maintenance protocols. Further, Ocean Tides will develop a consistent (across both campuses) file organization process. The Providence campus will organize all current records and files adhering to a consistent organizational and storage process. <b>Regulatory Citation:</b> (300.320; §300.43, §300.320; §300.43; §300.320, §300.322, §300.115)
		seen in the file. SW2 had the O'Shea and Star testing scores and SW3 only the O'Shea. Same for records SC1 and SC3. It was apparent that that a transition scope and sequence of per grade is not structured or aligned. (§300.320; §300.43). See also Section 3 (Item #1 for further information and additional support plan)	These findings must be corrected as soon as possible but no later than one year from the State's written notification of noncompliance.
	4. 5.	Assurance of Transition Services boxes not checked on the IEP SC1, SC3 (§300.320; §300.43). (See also Section 3 Item #1 for further information and further support plan information) Meeting invitations did not include pre-employment transition services (Pre-Ets). Transition Planning is there but not Pre-Ets §300.320(b)(2).	<u>Documentation</u> : Data Analysis; Record Reviews; Interviews; Observation
	6.	Record SW1. Consent for the most recent reevaluation was "agreed by phone" on 1/20/22 with no subsequent follow up documentation or an original signature (hard copy or electronic/DocuSign or video via zoom/teams/) §300.300. The consent for the reevaluations was in the "permanent release" section of the red file. A consent for a prior reevaluation is not a "permanent release."	Corrective Action / Support Plan: Verification (including reviewing subsequent data) will be facilitated by the Rhode Island Department of Education, Office of Student, Community and Academic Supports, that compliance issues are addressed and rectified.
	7.	Narragansett IEP goals were very basic/cookie cutter (SC1, SC2) and not individualized per the student. The school has recently adopted Power School and now requires the special educators to use that platform. This platform will assist educators in individualized IEP writing. §300.320 (See also Item #2 in this section).	Timeline: Immediately Progress Check: July 2024
	8.	Prior written notice not seen in files (§300.322). SW1, SW2. The red files (Providence) need to be organized to accurately reflect	

<ul> <li>contents as their disorganization causes compliance issues and concerns.</li> <li>9. Education environment "placement" box not checked (§300.115)(A) SC1, SC3. The use of the IEP platform "Power School "will assist in special educators not leaving any boxes blank on the IEP.</li> <li>(<i>RI Regulations Subpart D Evaluations, Eligibility Determinations,</i></li> </ul>	Follow Up Information:
Individualized Education Programs and Educational Placements)	

1	Specific Noncompliance Issues	Noncompliance Finding ( <i>if applicable</i> ):
	#1.) Ocean Tides hired an individual who was listed on the RIDE	Noncompliance Findings: Per Section 300.903 (b) All
	licensing application as the Curriculum Director/Coordinator however, this individual is not certified in Rhode Island nor does this individual	special education programs in any private and state operated day or residential school shall meet the same
	have certification as a District Level Administrator Curriculum,	standards as those established for public school
	Instruction and Assessment certification from another State. Ocean	programs. These findings should serve as a vehicle for
	Tides was informed by RIDE that this person could not be the	the *certified administration/leadership team
	Curriculum Director/Coordinator.	(including the special education director) to regroup,
		review and refine Ocean Tides protocols, policies, and
	Ocean Tides leadership then informed RIDE that the individual was a	procedures to clarify roles and responsibilities based
	teacher assistant not the Curriculum Director/Coordinator. The roles	on educational best practices with the student's needs
	and responsibilities of the teacher assistant need to be clarified and	(academic and social emotional) being the priority.
	defined so all staff understand what the job responsibilities of a	*Rhode Island certification
	teacher assistant are because of the varying staff perceptions and	
	understandings.	Regulatory Citation: §300.903, §300.320
	The monitoring team was also informed by Ocean Tides leadership	This finding must be corrected as soon as possible but
	during the initial review of information that all the individuals who	no later than one year from the State's written notification of noncompliance.
	work at Ocean Tides are all viewed as "educators" regardless of	notification of noncompliance.
	certification status. While that sentiment can be philosophically	Documentation: Data Analysis; Document Review,
	applied, it does not apply in a regulatory manner, and this	Record Reviews
	philosophical view is part of the staff confusion around roles and	Corrective Action/ Support Plan:
	responsibilities which need to be addressed and clarified. §300.903.	Verification (including reviewing subsequent data) will
	Please see the corresponding "Follow up Information $#1''$ for the	be facilitated by the Rhode Island Department of
	resolution of this specific issue.	Education, Office of Student, Community and
		Academic Supports, that compliance issues are
	#2.) As the Principal of Narraganset was out on sick leave for 2	addressed and rectified.
	weeks (at the time of this monitoring review) there were individuals	Timeline: Immediately
	covering in his absence. None of those individuals, however, had a building-based administrative certification. This was observed at the	
	school's morning meeting and in interviews.	Progress Check: July 2024
	schools morning meeting and in interviews.	Follow Up Information: #1.) In January of 2024, the noncertified individual
		was put in a different position and, as such, has <u>no</u>

	There is confusion amongst teaching staff in Narragansett about who is a school and/or central office administrator* and who is not. The principal was cited as the lead for the school, however in his absence, teachers and staff thought the Dean of Students was the assistant principal and/or second in charge. After that, the two other noncertified individuals were believed to be in charge. Having noncertified individuals in charge and/or staff perceiving that they are in change during the principal's absence does not adhere to the same standards as the public schools. §300.903. *Rhode Island certification as an administrator is necessary to be an educational administrator in a nonpublic special education school. What specific administration certification is needed depends upon the role. #3.) In Narragansett, the special educator, after consulting with the social service worker writes the social emotional/counseling goals for the IEP. The social service worker then provides those services per the IEP. This is done under the supervision of a school social worker; however, the school social worker currently does not write the goals or attend the IEP meetings. (§300.903, §300.320). Moving forward the school social worker agreed to write the goals with input from the social service worker and attend the IEP meetings. <i>Documentation: Data Analysis; Document Review, Observation, Interviews</i>	educational curriculum or supervision responsibilities, thus, resolving issue #1. Subsequent data review will verify if this continues to be resolved. #2.) Ocean Tides will submit evidence of refined or revised protocols and procedures and clarifying roles and responsibilities to staff. #3.) Moving forward the school social worker agreed to write the goals with input from the social service worker and attend the IEP meetings. Subsequent record reviews and interviews will verify if this is corrected.
2	Student Accommodations and/or Modifications	Noncompliance Finding ( <i>if applicable:</i> No finding.
	Ocean Tides has acquired a new IEP and 504 Writing Program	
	entitled Power School. It falls in line with many districts in RI. All documents are stored within this program for easy access. Teachers	Regulatory Citation: N/a
	have all been provided a username and password to access the	

	special needs student IEPs. Student accommodations and	Corrective Action/ Support Plan:
	modifications are made according to the IEP as appropriate. At the	<b></b>
	beginning of each school year, the Director of Special Education	Timeline: N/a
	provides the special education teachers/case managers (with a folder	
	which includes a list of IEP students). The list has the student's	Progress Check: N/a
	name, grade, disability, IEP due date and the LEA for each student.	
	The case managers provide the general education teachers with the	
	names of the students who have IEPs so they can go into Power	Follow Up Information:
	School and locate the student's IEP. The teachers also can view the	
	Summary page so they can quickly see the goals and objectives,	N/a
	modifications, and accommodations. Throughout the school year, as	
	more students arrive, the teachers are alerted that a student with an	
	IEP has arrived, and they need to check on the student documents	
	through Power School. This is done through daily afternoon meetings	
	at both campuses, so all teachers are aware of the student's	
	disability, their educational limitations (if any), their strengths, and	
	accommodations.	
	Documentation: Data Analysis; Document Review, Record Reviews	
2	Teaching and Learning	Noncompliance Finding (if applicable:
		No noncompliance findings. These are result findings.
	Both the Narragansett and Providence campuses have many teachers	The support plan is for the "Result's Findings $#1, #2,$
	that are emergency certified, thus, the need for administrative*	#3". These result findings should serve as a vehicle for
	oversight and support is strong. The following are examples of some	the *certified educational administrative team
	practices that need to be revised and clarified.	(including the special education director) to regroup,
	*Rhode Island certified administrators	review and refine Ocean Tides protocols, policies and
		procedures based on educational best practices with
	Result Findings	the student's needs (academic and social emotional)
		being the priority.
	#1) Teachers at the Narragansett campus reported that they take	*Rhode Island certification
	turns driving students to GED classes/exams. They leave their classes	
	in the morning and return in the afternoon. Other teachers then	Regulatory Citation: Per Section §300.903 (b) All
	function as substitute teachers who cover their classes in their	special education programs in any private and state

absence. It is unclear why any teacher would leave their	operated day or residential school shall meet the same
classes/students for a morning and or all day to drive students to	standards as those established for public school
GED classes when others who do not have instructional classes (e.g.,	programs. (§300.903). <i>Please keep this caution in</i>
director of programs, director of administration, group living staff,	mind when the *certified administrative team
etc.) could be tapped to do so. The monitoring team witnessed this	(including the special education director) is
occur at the school's morning meeting when volunteers were	regrouping.
requested to take a student to GED for the morning. A teacher volunteered to do so and then someone else volunteered to cover	*Rhode Island certification
their classes. While teachers want to help and assist wherever they	These result findings must be corrected as soon as
can, the priority, of course, should be to their student's instructional	possible but no later than one year from the State's
time and not driving students to appointments instead of teaching.	written notification of noncompliance.
This could easily become a compliance issue if the students are not receiving their services because their teacher is driving a student to GED class/exam etc.	Corrective Action/ Support Plan: Verification (including reviewing subsequent data) will
#2.) Ocean Tides has a school counselor who works four days a week	be facilitated by the Rhode Island Department of
(.75). This position currently divides the .75 into three days (Tuesday,	Education, Office of Student, Community and Academic Supports, that these result issues are
Wednesday & Friday) at the Narraganset campus and one day	addressed and rectified.
(Thursday) at the Providence campus although Providence had	
significantly more students with IEPs. It is unclear why the school	Timeline: Immediately
counselor does not physically spend two days at each campus which	
also relates to transition planning. Please see Section 3, item# 1 for additional information.	Progress Check: July 2024
Documentation: Interviews, Document Review, Observation	Follow Up Information:
Documentation: Interviews, Document Review, Observation	<u> </u>

3	<b>Consolidated Resource Plan (CRP-IDEA-Part B)</b> A component of the School Support System (SSS) review is the IDEA, Consolidate Resource Plan (CRP -fiscal funding). The Narragansett Campus has a contract with Rhode Island Department of Children Youth & Families (DCYF) thus making them a limited LEA and eligible	Noncompliance Finding ( <i>if applicable:</i> No compliance findings but a caution to continue to ensure that the special education director has oversight of all IDEA-Part B monies via the CRP process.
	to receive IDEA funds through the CRP application process. Special education director oversight of special education funds is critical for the ongoing clear and consistent budget planning and	Regulatory Citation: N/a
	execution to improve and sustain best practice results for students with IEPs and ensure compliance with regulatory requirements. Thus, there is a critical priority need for the special education director to have administrative oversight and authority on how and when federal IDEA monies are spent in the district. This is, naturally, tied to an aligned and connected array of interventions, materials, supports and technical assistance which are necessary to ensure compliance with	Corrective Action/ Support Plan: Verification (including reviewing subsequent data) will be facilitated by the Rhode Island Department of Education, Office of Student, Community and Academic Supports, that compliance is adhered to. Timeline: N/a
	the IDEA requirements (300.320).	Progress Check: N/a
	Documentation: Data Analysis; Document Review, CRP review	Follow Up Information:

#### 3. IDEA TRANSITION

Item #	Review Information	Noncompliance Finding & Corrective Action / Support Plan (if applicable)
1	IDEA Transition Planning	Noncompliance Finding ( <i>if applicable:</i> Noncompliance Finding: Se also Section 2 (item #1)
	Ocean Tides utilizes Harrington O'Shea and O*NET as its main	Vocational assessment documents/data will be
	vocational assessments. As noted in the record review section (Section	reflected in the student's physical record and as an
	2, item #1) no Ocean Tides vocational assessment documents were	embedded part of the IEP process and overall
	seen in the records nor were any individuals able to discuss what the	transition planning. The special education case
	results of these specific student assessments were or how they were	managers will complete their respective student's
	embedded into the IEPs. Additionally, students did not recall taking	vocational assessment and transition planning process.
	these assessments or reviewing the results. It was apparent from the	Further, Ocean Tides will develop a scope and
	records and the IEPs that that the transition scope and sequence per	sequence of transition assessments and transition
	grade is not structured or aligned. (§300.320(b); §300.43).	related opportunities (as evidenced through
	<ul> <li>The Providence campus has a Care Team that meets weekly to discuss student's needs. This team includes the special educator, special education director, social worker, nurse, and school counselor. This could be an opportunity for the school counselor to connect the students' vocational needs with opportunities for meaningful transition experiences in the community.</li> <li>If these programs are set up by the School Counselor, students go to internships and job shadowing experiences, in the local Providence and Narragansett Campuses with local businesses who participate with the school program. Currently there are no (0) internships and job shadowing experience campus.</li> </ul>	<ul> <li>programming and reflected in the individualized IEPs for both campuses). Protocols and procedures of the transition IEP process will be reviewed with the special educators to ensure effective communication of the students' individualized needs and compliance and assurance of transition services. The school counselor will develop and connect the students' vocational needs with opportunities for meaningful transition experiences in the community (e.g., job shadowing, internships etc.) on the Providence campus.</li> <li><b>Regulatory Citation:</b> §300.320(b); §300.43 §300.320 (b) Transition services. For a child with a disability, beginning at age fourteen (14) or younger if deemed appropriate by the IEP team and updated annually, thereafter the IEP must include (1)</li> </ul>
	The Office of Rehabilitative Services (ORS) representative works with the Providence campus to assist students in securing employment once they graduate from Ocean Tides.	
		Appropriate measurable postsecondary goals based on age appropriate transition assessments related to training, education, employment goals based upon age appropriate transition assessments related to training,

		education, employment and where appropriate independent living skills; and (2) The transition
		services (including course of study) needed to assist the child in reaching those goals.
		This finding must be corrected as soon as possible but no later than one year from the State's written notification of noncompliance.
		<u>Corrective Action/ Support Plan</u> : Verification (including reviewing subsequent data) will be facilitated by the Rhode Island Department of Education, Office of Student, Community and Academic Supports, that compliance issues are addressed and rectified.
		Timeline: Immediately
		Progress Check: July 2024
		Follow Up Information:
2	Both the Narragansett campus and Providence campus refer students, through the IEP meetings, to the <b>Office of Rehabilitative Services</b> (ORS) and to the <b>Department of Behavioral Healthcare</b> , <b>Developmental Disabilities &amp; Hospitals (BHDDH).</b>	Noncompliance Finding ( <i>if applicable:</i> No finding.
	In recent years ORS has had a very close relationship, particularly with	Regulatory Citation: N/a
	the Providence campus. ORS works with potential candidates and meets with them for possible eligibility for ORS Pre-ET services as the	Corrective Action/ Support Plan:
	students are in school. ORS has worked with qualified students from the Providence campus and has had success in gaining employment.	Timeline: N/a
	Last year, the social worker (LICSW) at the Providence campus assisted	

	<ul> <li>one of our seniors and his family to complete the BHDDH application. This year, our ORS representative has facilitated three adult applications during this first quarter of school.</li> <li>Both representatives from ORS and BHDDH attend the meetings in Narragansett, but due to the students' unknown situations and the length of time they will be at the residential program, most students decline the offer from both agencies.</li> <li><u>Documentation</u>: Data Analysis; Document Review, Record Reviews</li> </ul>	Progress Check: N/a Follow Up Information: N/a
3	<b>Summary of Performance (SOP)</b> is facilitated by the case managers as appropriate. The Director of Special Education provides the case managers with the names of the graduating seniors. From there, the case managers will conduct a record review for each student and facilitate completion of the Summary of Performance to review at the IEP meeting.	No finding. Regulatory Citation: N/a <u>Corrective Action/ Support Plan</u> : Timeline: N/a Progress Check: N/a
	Documentation: Data Analysis; Document Review, Record Reviews	<b>Follow Up Information:</b> N/a