



**Natick Public Schools**

**INTEGRATED MONITORING REVIEW  
REPORT**

**Office of Public School Monitoring**

**For Group A Universal Standards**

**Date of Onsite Visit: March 5, 2025**

**Date of Report: April 29, 2025**

**Action Plan Due: May 28, 2025**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION  
INTEGRATED MONITORING REVIEW REPORT**

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**INTEGRATED MONITORING REVIEW**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION  
OFFICE OF PUBLIC SCHOOL MONITORING  
INTEGRATED MONITORING REVIEW REPORT INTRODUCTION**

During the 2024-2025 school year, Natick Public Schools participated in an Integrated Monitoring Review (IMR) conducted by the Department of Elementary and Secondary Education's (DESE or Department) Office of Public School Monitoring (PSM). The purpose of the Integrated Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

**Components of the Integrated Monitoring Review**



Integrated Monitoring is one of eight components of a state's general supervision system. One aspect of Integrated Monitoring is the Integrated Monitoring Review. Each school district, charter school, vocational school, and virtual school undergoes an Integrated Monitoring Review every three years. The Department's Office of Public School Monitoring (PSM) is responsible for conducting these reviews and works closely with offices throughout the Department including, but not limited to, the Office of Special Education Planning and Policy (SEPP), Problem Resolution System Office (PRS), and the Office of Approved Special Education Schools (OASES) to promote cohesion and collaboration across the Department's general supervision system. As set forth in the diagram above, Integrated Monitoring Review is one of the multilayered, cohesive, and formal processes employed by the Department to examine and evaluate all LEAs' implementation of IDEA with a particular emphasis on educational results, functional outcomes, and compliance.

The monitoring cycle is posted at [Integrated Monitoring Review Three Year Cycle](#).

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 Focused Standards, which are reviewed if the Department deems appropriate due to concerns with those particular standards. In those circumstances, the identified Focused Standards are assessed in addition to the Universal Standards.

Universal Standards and Focused Standards are aligned with the following regulations:

**Special Education (SE)**

- Selected requirements from the federal Individuals with Disabilities Education Act (IDEA), 20 U.S.C. § 1400 *et seq* and accompanying regulations at 34 CFR Part 300.
- Massachusetts General Law Chapter 71B, and the Massachusetts Special Education regulations (603 CMR 28.00).

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

- Specific 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 Rehabilitation Act of 1973; and Title II of the Americans with Disabilities Act of 1990, together with select state requirements under M.G.L. c. 76, § 5 and M.G.L. c. 269 §§ 17 through 19.
- Specific requirements from the Massachusetts Physical Restraint regulations (603 CMR 46.00).
- Specific requirements from the Massachusetts Student Learning Time regulations (603 CMR 27.00).
- Specific requirements from the Massachusetts Student Records regulations (603 CMR 23.00).
- Various requirements under other federal and state laws and regulations.

**Integrated Monitoring Review Process:**

**Discovery:** During the Discovery stage, the PSM chairperson analyzes data and information to prepare for the onsite visit. The chairperson also reviews documents submitted by the district/school.

**Engagement:** The Engagement stage of the Integrated Monitoring Review includes all activities conducted onsite and/or virtually through the issuance of the Integrated Monitoring Review Report. Such activities may include record review, interviews, and observations.

**Close-out:** Once the Report is issued, the Close-out stage begins for the schools and districts with any identified findings of noncompliance. The Close-out stage includes the development of the Correction Action Plan and completion of subsequent progress reports to ensure all instances of noncompliance are resolved within one year of the issuance of the Integrated Monitoring Review Report.

**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.

**Report for Integrated Monitoring Reviews:**

The Integrated Monitoring Review Report will be issued within approximately 30 days of the conclusion of the onsite visit.

**Pre-finding Corrections:**

During the Discovery and Engagement stages of the review, PSM staff may find that the district/school violated an IDEA requirement prior to the issuance of a finding in the Integrated Monitoring Review Report. In such cases, PSM staff may implement the pre-finding correction protocol. If PSM staff verify that the identified noncompliance is resolved prior to the issuance of the report, no finding is made. However, a list of any pre-finding corrections will be included in the Integrated Monitoring Review Report. More information regarding the pre-finding correction protocol can be found in the PSM procedures at <https://www.doe.mass.edu/psm/procedures.docx>.

**Ratings:** In the Integrated Monitoring Review Report, the onsite team gives a rating for each compliance criterion it has reviewed; those ratings are “Commendable,” “Implemented,” “Implementation in Progress,” “Partially Implemented,” “Not Implemented,” “Not Applicable,” and “Prior Noncompliance - Corrective Action Under Review.”

The onsite team includes a comment in the Integrated Monitoring Review Report for each criterion that it rates “Commendable,” “Partially Implemented,” “Not Implemented,” or “Prior Noncompliance - Corrective Action Under Review,” explaining the basis for the rating.

**Corrective Action:** Where criteria are found “Partially Implemented” or “Not Implemented,” a corrective action plan (CAP) is developed to bring those areas into compliance with the relevant statutes and regulations. Department staff work with districts and charter schools on the development of an appropriate CAP.

PSM staff also provide ongoing technical assistance as the school or district is implementing the approved CAP. **School districts and charter schools 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 Monitoring Report.**

Where criteria are rated “Prior Noncompliance - Corrective Action Under Review,” the district/charter school will work with staff from the specific Department office that identified the noncompliance to develop a corrective action plan.

For more information regarding the Integrated Monitoring Review Process, including district and parent resources, please visit < <https://www.doe.mass.edu/psm/integrated/default.html> >.

## **INTEGRATED MONITORING REVIEW DETAILS for Natick Public Schools**

The Massachusetts Department of Elementary and Secondary Education conducted an Integrated Monitoring Review in Natick Public Schools during the week of March 3, 2025, to evaluate the implementation of Group A 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, to observe classroom facilities, 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:

### **District Civil Rights Self-Assessment Phase:**

- Review of civil rights documentation for required elements including document uploads.
- Upon completion, the civil rights self-assessment was submitted to the Department for review.

### **Discovery Phase:**

- District review of student records related to the Indicator Data Collection for Indicators 11, 12, and 13.
- Upon completion, the results of the Indicator Data Collection for Indicators 11, 12, and 13 were submitted to the Department for review.
- Review of key data points focused on educational results and functional outcomes. For more details regarding the data review, please see the PSM procedures at <https://www.doe.mass.edu/psm/procedures.docx>.

### **Engagement Phase:**

- Interviews of administrative and instructional staff consistent with those criteria selected for onsite verification.
- Interview of a special education parent advisory council (SEPAC) 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 the district's special education student roster. The onsite team conducted this review, using standard Department procedures, to determine whether procedural and programmatic requirements have been met.
- Observations of time-out rooms.

The Integrated Monitoring Review Report includes those criteria that were found by the team to be implemented in a "Commendable" manner, as well as criteria receiving a rating of "Partially Implemented," "Not Implemented," "Implementation in Progress", and "Prior Noncompliance - Corrective Action Under Review." (Refer to the "Definition of Compliance Ratings" section of the report.) Reports do not include criteria receiving a rating of "Implemented" or "Not Applicable." This will allow the district/school and the Department to focus their efforts on those areas requiring corrective action. Districts/schools are expected to incorporate the corrective actions into their district and school improvement plans, including their professional development plans.

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## 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>Prior Noncompliance - Corrective Action Under Review</b>	A finding of noncompliance was made by another office in the Department and the school/district is currently undergoing corrective action activities.
<b>Not Applicable</b>	The requirement does not apply to the school district or charter school.



## Natick Public Schools

### SUMMARY OF COMPLIANCE CRITERIA 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 5, 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 38, SE 39, SE 40, SE 41, SE 42, SE 43, SE 44, SE 45, SE 46, SE 47, SE 48, SE 49	CR 13, CR 14
<b>PARTIALLY IMPLEMENTED</b>	SE 18B	CR 18
<b>NOT IMPLEMENTED</b>	None	
<b>NOT APPLICABLE</b>	None	

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 PRE-FINDING CORRECTIONS**

The pre-finding correction protocol was implemented prior to the issuance of the Integrated Monitoring Report and all instances of noncompliance were resolved by the district. Evidence of correction was reviewed and verified by the Department for the following criteria:

**SE 14:** Review and revision of IEPs

**SE 37:** Approved and unapproved out-of-district placements

**SE 39:** Procedures used to provide services to eligible students enrolled in private schools at private expense

**SE 40:** Instructional grouping requirements for students aged five and older

**SE 44:** Procedures for recording suspensions

## 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	

The district submitted evidence of corrective action to address the non-compliance identified for Indicators 11 and 13. The submissions were reviewed and approved by the Department. The Department also conducted a review of a second set of student records to ensure ongoing compliance. All records were found compliant; no further action is required.

**SPECIAL EDUCATION**

**LEGAL STANDARDS,  
COMPLIANCE RATINGS AND  
FINDINGS**

CRITERION NUMBER		
	<b>Legal Standard</b>	
<b>SE 18B</b>	<b>Determination of placement; provision of IEP to parent</b> 1. At the Team meeting, after the IEP has been fully developed, the Team determines the appropriate placement to deliver the services on the student's IEP. 2. Unless the student's IEP requires some other arrangement, the student is educated in the school that he or she would attend if the student did not require special education. 3. The decision regarding placement is based on the IEP, including the types of related services that are to be provided to the student, the type of settings in which those services are to be provided, the types of service providers, and the location at which the services are to be provided. 4. Reserved. 5. Immediately following the development of the IEP, the district provides the parent with two (2) copies of the proposed IEP and proposed placement along with the required notice, except that the proposal of placement may be delayed according to the provisions of 603 CMR 28.06(2)(e) in a limited number of cases.	
	<b>State Requirements</b>	<b>Federal Requirements</b>
	603 CMR 28.05(6) and (7); 28.06(2)	34 CFR 300.116; 300.325
	<b>Rating: Partially Implemented</b>	<b>District Response Required: Yes</b>

**Department of Elementary and Secondary Education Findings:**

*A review of student records indicated that the district does not always provide the parent with a proposed IEP and proposed placement immediately following the development of the IEP.*

**CIVIL RIGHTS  
METHODS OF ADMINISTRATION (CR)  
AND  
OTHER RELATED GENERAL EDUCATION  
REQUIREMENTS**

**LEGAL STANDARDS,  
COMPLIANCE RATINGS AND  
FINDINGS**

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION (CR) AND OTHER RELATED GENERAL EDUCATION REQUIREMENTS VI. FACULTY, STAFF AND ADMINISTRATION
	Legal Standard
CR 18	<p><b>Responsibilities of the school principal</b></p> <ol style="list-style-type: none"> <li>1. <u>Instructional support</u>. The principal in each of the district's schools promotes instructional practices responsive to student needs and ensures that adequate instructional support is available within the general education program for students and teachers. Instructional support includes remedial instruction for students, consultative services for teachers, availability of reading instruction at the elementary level, appropriate services for linguistic minority students, and other services consistent with effective educational practices and the requirements of M.G.L. c. 71B, §2. The principal consults with the administrator of special education regarding accommodations and interventions for students. Such efforts and their results are documented and placed in the student record. Additionally, when an individual student is referred for an evaluation to determine eligibility for special education, the principal ensures that documentation on the use of instructional support services for the student is provided as part of the evaluation information reviewed by the Team when determining eligibility. The school district does not limit a parent's right to refer a student for timely special education evaluation because the district has not fully explored and/or attempted some or all of the available instructional support programs or other interventions available in general education that may be described in the district's curriculum accommodation plan, including any pre-referral program.</li> <li>2. <u>Curriculum Accommodation Plan</u>. The principal implements a curriculum accommodation plan <u>developed by the district's general education program</u> to ensure that all efforts have been made to meet the needs of diverse learners in the general education program. The plan assists the regular classroom teacher in analyzing and accommodating diverse learning styles of all children in the regular classroom and in providing appropriate services and support within the general education program including, but not limited to, direct and systematic instruction in reading and provision of services to address the needs of children whose behavior may interfere with learning. The plan includes provisions encouraging teacher mentoring and collaboration and parental involvement. <i>(The plan may be part of a multi-year strategic plan.)</i></li> <li>3. <u>Early Literacy Screening</u>. Effective July 31, 2023, each school district shall at least twice per year assess each student's reading ability and progress in literacy skills, from kindergarten through at least third grade, using a valid, developmentally appropriate screening instrument approved by the Department. Consistent with section 2 of chapter 71B of the general laws and the</li> </ol>

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION (CR) AND OTHER RELATED GENERAL EDUCATION REQUIREMENTS VI. FACULTY, STAFF AND ADMINISTRATION	
	Legal Standard	
	<p>Department's dyslexia and literacy guidelines, if such screenings determine that a student is significantly below relevant benchmarks for age-typical development in specific literacy skills, the school shall determine which actions within the general education program will meet the student's needs, including differentiated or supplementary evidence-based reading instruction and ongoing monitoring of progress. Within 30 school days of a screening result that is significantly below the relevant benchmarks, the school shall inform the student's parent or guardian of the screening results and the school's response and shall offer them the opportunity for a follow-up discussion.</p> <p>4. <u>Coordination with special education</u>. The principal, with the assistance of the administrator of special education, coordinates the delivery and supervision of special education services within each school building.</p> <p>5. <u>Educational services in home or hospital</u>. Upon receipt of a physician's written order verifying that any student enrolled in a public school or placed by the public school in a private setting must remain at home or in a hospital on a day or overnight basis, or any combination of both, for medical reasons and for a period of not less than fourteen school days in any school year, the principal arranges for provision of educational services in the home or hospital. Such services are provided with sufficient frequency to allow the student to continue his or her educational program, as long as such services do not interfere with the medical needs of the student. The principal coordinates such services with the Administrator for Special Education for eligible students. Such educational services are not considered special education unless the student has been determined eligible for such services, and the services include services on the student's IEP.</p>	
	M.G.L. c. 71, § 38Q 1/2; 603 CMR 28.03(3); 603 CMR 28.03(1)(f)	
	Rating: Partially Implemented	District Response Required: Yes

**Department of Elementary and Secondary Education Findings:**

*A review of documents indicated that the district's procedures for early literacy universal screening assessments do not address that within 30 school days of a screening result that is significantly below the relevant benchmarks, the school informs the student's parent/guardian of the results and provides the opportunity for a follow-up discussion.*

*Record review and staff interviews indicated that when screenings results are significantly below relevant benchmarks, the district does not consistently determine which actions within the general education program will meet the student's needs, including differentiated or supplementary evidence-based reading instruction and ongoing monitoring of progress.*



This Integrated Monitoring Review Report is also available at:  
<https://www.doe.mass.edu/psm/tfm/reports/>.  
Profile information supplied by each charter school and school district, including information for  
individual schools within districts, is available at  
<http://profiles.doe.mass.edu/>.

WBMS IMR Report

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