Policies and Procedure Manual
Table of Contents

Pathways Academy maintains a policies and procedures manual, including a health policies and procedures manual onsite. Pathways Academy provides written notice to parents of enrolled students that copies of such policies and procedures are available upon request.

The following policies and procedures are included in the manual:

1. Demonstration of Need for Program (Criterion 1.1)
2. Program & Student Description, Program Capacity (Criterion 1.2)
3. Legal and Financial Status (Criterion 2.1)
4. Approvals, Licenses, Certificates of Inspection (Criterion 2.2)
5. EEC Licensure (Criterion 2.3)
7. Reporting Suspected Child Abuse / Neglect to Department of Children and Families and to the Disabled Persons Protection Commission (Criterion 3.1(c))
8. Evacuation and Emergency Procedures (Criterion 3.1(d))
9. Health Care Manual (Criterion 3.2 / 16.1 [2001-02])
10. Aspects of Program, Staff Credentials and Students Records (Criterion 4.1[2001-02])
11. Public Information and Postings (Criterion 4.2)
12. Publicly Available Information (Criterion 4.3 [2001-02])
13. Advanced Notice of Proposed Program / Facility Change (Criterion 4.4)
14. Immediate Notification (Form 2) (Criterion 4.5)
15. Student Admissions (Criterion 5.1)
16. Admissions Packet (Criterion 5.1(a))
17. Policies and Procedures for Coordination/ Collaboration with Public School Districts (Criterion 5.2 [2001-02])
18. Contracts (Criterion 5.2(a))
19. Daily Instructional Hours (Criterion 6.1)
20. Physical Education Requirements (Criterion 6.1(a))
21. School Days per Year (Criterion 6.2 [2001-02])
22. School to Work (Criterion 6.2)
23. School Days per Year (Criterion 6.4)
24. Curriculum Frameworks (Criterion 7.1)
25. State / District Wide Assessments (Criterion 7.3)
26. High School Diplomas and Certificates of Attendance (Criterion 7.4)
27. Implementation- Educational Services (Criterion 8.1[2001-02])
28. Implementation- Related Services (Criterion 8.2 [2001-02])
29. Implementation- Supplementary Aid/Services (Criterion 8.3 [2001-02])
30. Program Modifications & Support Services for English Language Learners (Criterion 8.4)
31. Current IEP & Student Roster (Criterion 8.5)
32. IEP – Implementation (Criterion 8.6 [2001-02])
33. IEP – Progress Reports (Criterion 8.7 [2001-02])
34. IEP – Progress Reports (Criterion 8.8)
35. Less Restrictive Placement (Criterion 8.10)
36. IEP - Transition Planning (Criterion 8.11)
37. Behavior Support/ Management (Criterion 9.1)
38. Student Separation Resulting From Behavior (Criterion 9.1(a))
39. Runaway Students (Criterion 9.3)
40. Physical Restraint (Criterion 9.4)
41. 3-5 Day Suspension (Criterion 9.5)
42. 10+ Day Suspension (Criterion 9.6)
43. Terminations (Criterion 9.7)
44. Staffing for Instructional Groupings (Criterion 10.1)
45. Age Range (Criterion 10.2)
46. Staff Policies and Procedures Manual (Criterion 11.1)
47. Administrative Responsibility (Criterion 11.2)
48. Educational Administrator Qualifications (Criterion 11.3)
49. Teachers (Criterion 11.4)
50. Related Services Staff (Criterion 11.5)
51. Master Staff Roster (Criterion 11.6)
52. Job Descriptions (Criterion 11.7)
53. Salary Ranges (Criterion 11.8 [2001-02])
54. Organizational Structure (Criterion 11.9)
55. Supervision of Direct Care Day and Residential Staff (Criterion 11.10[2001-02])
56. Supervision of Students (Criterion 11.11)
57. Equal Access (Criterion 11.12)
58. New Staff Orientation and Training (Criterion 12.1)
59. In-Service Training Plan and Calendar (Criterion 12.2)
60. Required Training - Behavior Management and Restraint Training (Criterion 12.2 (a))
61. Child Abuse Reporting (Criterion 12.2 (b) [2001-02])
62. Required Training – CPR Certification (Criterion 12.2 (c))
63. Required Training – Medication Training (Criterion 12.2 (d) [2013-14])
64. Required Training – Emergency Procedures (Criterion 12.2 (f) [2013-14])
65. Educational Facilities and Materials (Criterion 13.1 [2001-02])
66. Description of Physical Facility (Criterion 13.2)
67. Physical Facilities/ Architectural Barriers (Criterion 13.3 [2001-02] / 13.4)
68. Classroom Space (Criterion 13.5 [2001-02])
69. Library / Resource Room (Criterion 13.6 [2001-02] / 13.7)
70. Outdoor Space (Criterion 13.8 / 13.9 [2013-2014])
71. Food and Nutrition (Criterion 14.2)
72. Toileting Procedures and Individual Plans (Criterion 14.3)
73. Parental Involvement and Parents’ Advisory Group (Criterion 15.1)
74. Orientation Procedure (Criterion 15.2 [2001-02])
75. Information to be Translated into Languages Other Than English (Criterion 15.3)
76. Change of Student’s Legal Status (Criterion 15.4)
<table>
<thead>
<tr>
<th></th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>77</td>
<td>Parent Consent and Required Notification (Criterion 15.5)</td>
</tr>
<tr>
<td>78</td>
<td>Consent at Age of Majority (Criterion 15.6 [2001-02])</td>
</tr>
<tr>
<td>79</td>
<td>Registration of Complaints (Criterion 15.7 [2001-02])</td>
</tr>
<tr>
<td>80</td>
<td>Registering Complaints/ Grievances: Parents, Students, Employees (Criterion 15.8)</td>
</tr>
<tr>
<td>81</td>
<td>Physician Consultation (Criterion 16.2)</td>
</tr>
<tr>
<td>82</td>
<td>Nursing (Criterion 16.3)</td>
</tr>
<tr>
<td>83</td>
<td>Emergency First Aid and Medical Treatment (Criterion 16.4)</td>
</tr>
<tr>
<td>84</td>
<td>Administration of Medication (Criterion 16.5)</td>
</tr>
<tr>
<td>85</td>
<td>Administration of OTC Medication</td>
</tr>
<tr>
<td>86</td>
<td>Administration of Antipsychotic Medication (Criterion 16.6)</td>
</tr>
<tr>
<td>87</td>
<td>Preventive Health Care (Criterion 16.7)</td>
</tr>
<tr>
<td>88</td>
<td>Receipt of Medical Treatment – Religious Beliefs (Criterion 16.8)</td>
</tr>
<tr>
<td>89</td>
<td>Student Allergies (Criterion 16.11)</td>
</tr>
<tr>
<td>90</td>
<td>Smoking and Tobacco (Criterion 16.12)</td>
</tr>
<tr>
<td>91</td>
<td>Transportation Safety (Criterion 17.1)</td>
</tr>
<tr>
<td>92</td>
<td>Confidentiality of Student Records (Criterion 18.1)</td>
</tr>
<tr>
<td>93</td>
<td>Anti-Hazing (Criterion 19)</td>
</tr>
<tr>
<td>94</td>
<td>IEP Meeting Participation (34 CFR 300.321)</td>
</tr>
<tr>
<td>95</td>
<td>Bullying Prevention and Intervention (Criterion 20)</td>
</tr>
<tr>
<td>96</td>
<td>Lice (Criterion A)</td>
</tr>
<tr>
<td>97</td>
<td>Snow Policy (Criterion B)</td>
</tr>
<tr>
<td>98</td>
<td>Absent &amp; Late Arrival (Criterion C)</td>
</tr>
<tr>
<td>99</td>
<td>Field Trips (Criterion D)</td>
</tr>
<tr>
<td>100</td>
<td>Internet Use (Criterion E)</td>
</tr>
<tr>
<td>101</td>
<td>Cell Phone Use (Criterion F)</td>
</tr>
<tr>
<td>102</td>
<td>Emergency Contacts (Criterion G)</td>
</tr>
<tr>
<td>103</td>
<td>Sick Policy (Criterion H)</td>
</tr>
<tr>
<td>104</td>
<td>Annual Consent Forms and Required Information (Criterion I)</td>
</tr>
<tr>
<td>105</td>
<td>Student Dress Code (Criterion J)</td>
</tr>
<tr>
<td>106</td>
<td>Search and Seizure of Students' Belongings (Criterion K)</td>
</tr>
<tr>
<td>107</td>
<td>Classroom Composition (Criterion L)</td>
</tr>
<tr>
<td>108</td>
<td>Weapons Policy (Criterion M)</td>
</tr>
<tr>
<td>109</td>
<td>Personal Items (Criterion N)</td>
</tr>
<tr>
<td>110</td>
<td>Injury Prevention Plan (Criterion O)</td>
</tr>
<tr>
<td>111</td>
<td>Prevention and Control of Infectious Diseases (Criterion P)</td>
</tr>
<tr>
<td>112</td>
<td>Infection Control Procedures (Criterion Q)</td>
</tr>
<tr>
<td>113</td>
<td>Student Hygiene (Criterion R)</td>
</tr>
<tr>
<td>114</td>
<td>Social Media Policy (Criterion S)</td>
</tr>
<tr>
<td>115</td>
<td>Open Meeting Policy (Criterion T)</td>
</tr>
<tr>
<td>116</td>
<td>Student Driving (Criterion U)</td>
</tr>
</tbody>
</table>
117. Gift to Staff (Criterion V)
118. Visitors (Criterion W)
1. Demonstration of Need for Program (Criterion 1.1)

Statement of Assurances is on file in the Educational Administrator’s office.
2. Program & Student Description, Program Capacity (Criterion 1.2)

Population Summary
Pathways Academy is a day program with an operational capacity of 32 students, with 24 students currently enrolled (as of 8/01/17). Pathways Academy serves students between the ages of 6 through 22 years of age with diagnoses of neurodevelopmental disorders including, but not limited to Autism Spectrum Disorders, with or without co-occurring psychiatric disorders.

Educational Characteristics of Pathways Academy Students
Students come to Pathways Academy with a complex array of learning and social emotional needs:

- Students at Pathways Academy may present with significant anxiety around school in general and/or specific subjects.
- Many students struggle with school phobia and have had previous negative experiences in other school settings.
- Students at Pathways Academy tend to have average intelligence scores although significant gaps in knowledge and delay in skill development are common.
- Some students may have specific learning disabilities and challenges with processing speed.
- Most students at Pathways Academy have had negative experiences in programs with strict ABA philosophies and benefit from our system of social-pragmatic learning and natural consequences.

Social-Emotional and Behavioral Characteristics
Many of the students at Pathways Academy struggle with:

- Typical school and classroom demands
- Social Skills
- Sensory processing
- School-related anxiety
- Frustration with school subject matter
- Limited ability to produce written work
- Working on non-preferred topics
- Accepting instruction
- Making mistakes
- Frustration tolerance
- Rigid thinking
- Unrealistic expectations of themselves
- Limited tolerance for change/transition
- Mathematics and/or Writing
- Schoolwork output in general
- Motor skills (fine and gross)
- Attention and/or impulse control
- Reduced processing speed
- Tendency to perseverate on thoughts or actions
- Tendency to become caught up in anxious thinking and worry
- Tendency to shut down when demands outweigh coping skills
• Tendency to act out when demands outweigh coping skills

Philosophy, Goals, and Objectives of the Program
Pathways Academy strives to meet the physical, social, and academic needs of children and adolescents who are out of school or struggling in school and are having difficulty understanding social cues and tend to misunderstand and misinterpret social situations.

• Pathways Academy provides services, based on the philosophy of developmental, child-centered education.
• All behaviors are seen as a form of communication.
• The goal and objectives of the program are to provide students with a low-stress, therapeutic learning environment in which each student’s plan can be customized based on his/her individual academic, social, and cognitive profile.
• Pathways Academy students often have difficulty integrating their experiences and interactions and drawing expected inferences.
• Students’ reduced ability in these areas often leads to feelings of frustration, limited success, and low self-esteem.
• Students may also have co-occurring psychiatric diagnoses, including depression, social and academic anxiety, and/or mood disorders.
• Pathways Academy utilizes a consistent implementation of positive behavioral supports and natural consequences to manage student behavior.
• Every effort is made to encourage positive behavior by acknowledging and reinforcing cooperative interaction, developing consistent clear rules in conjunction with the student, and designing classrooms/play spaces with children’s needs in mind.
• Students are encouraged to use their language and developing social skills to resolve conflicts instead of using harmful or physically aggressive behaviors.
• Students are taught to find appropriate avenues for meeting their needs and for defusing their anger.

Social Pragmatics
Social pragmatics is taught directly as a core subject and is integrated throughout the school day. Pathways Academy is committed to providing a supportive environment in which students can learn, develop, and practice social pragmatic skills, both with staff members and with one another.

• Field trips into the community provide students the opportunity to practice skills in other settings.
• Pragmatics instruction includes skills such as asking for help, listening, bringing materials to class, following instructions, friendship skills, beginning and ending a conversation, joining in a conversation, playing a game, asking a favor, giving and receiving a compliment, sharing, apologizing, dealing with feelings including knowing and expressing feelings, recognizing the feelings of others, expressing concern, dealing with anger, dealing with another person’s anger, dealing with fear, and expressing affection.
• Students also learn coping strategies and social-emotional regulation strategies.
• Students are taught methods to improve their understanding and expression of non-verbal communication, how to successfully deal with anxiety, and skills for dealing with stress.
Curriculum Frameworks and Common Core Standards
At Pathways Academy the Educational Administrator ensures that all staff members have an understanding and knowledge of the general curriculum expectations of the Massachusetts Curriculum Frameworks Learning Standards and the content requirements of the Common Core Standards.

- The Educational Administrator presents an annual in-service on Common Core Standards/Massachusetts Curriculum Frameworks is held for all staff members.
- The Educational Administrator ensures that this knowledge has been incorporated into the educational programs developed for each student as written in his/her Individualized Education Plan (IEP).

Life Skills, Self Help Skills, and Daily Living Skills
Pathways Academy addresses daily living and self care skills through a variety of classes and through Occupational Therapy services:

- **Occupational Therapy Evaluation**: Students are able to receive an Occupational Therapy evaluation upon matriculation at Pathways Academy to determine sensory, motor, and self care needs; many students receive weekly Occupational Therapy services.
- **Sensory Tools**: All students receive instruction and assistance throughout the day as needed in the area of sensory integration self-care; students are supported in choosing and utilizing appropriate sensory tools to meet their sensory needs.
- **Transition Planning/Life Skills class**: All students have weekly Transition Planning/Life Skills classes in which they learn self help and daily living skills, such as consumer math, simple meal preparation, self care, personal hygiene, folding laundry, and various household chores.
- **Health class**: All students also have a weekly Health class in which they learn health-related self care and daily living skills including nutrition, hygiene, and safety.
- **Social-Pragmatics class**: All students receive social pragmatics instruction as a core academic course; in pragmatics class, students learn about the social-pragmatic aspect of the skills required for daily living.
- **Culinary Arts class**: All students have a weekly culinary arts class in which they learn kitchen and meal preparation skills.
- **Community Outings**: Students participate in weekly community outings designed to build and strengthen social-pragmatics and daily living skills and to help generalize these skills across multiple settings. Community outings provide opportunities for students to increase their comfort level in the community while developing skills to increase functional independence in settings such as the grocery store, pharmacy, ballpark, public garden, museum, ice cream shop, restaurant, etc.
Learning Environment: Addressing the Learning and Social-Emotional Needs of Students

The learning environment at Pathways Academy is designed to support students who may struggle with attention/impulse control, emotional and sensory modulation, frustration tolerance, and meeting the social expectations of a typical classroom setting.

- Pathways Academy’s work environment provides for low-distraction work areas, preferential seating away from distractions and/or close to the teacher, preparation of students for transitions and changes in routines, support during transition times and ear-phones for all equipment with audio functions.
- Pathways Academy provides support for free time activities, low ratio supervision throughout the day, carpeting on floors, dimmer switches on lights, and availability of incandescent or fluorescent lighting.
- A consistent, predictable schedule is readily available to students within their classroom on a daily basis.
- All assignments are clearly presented in writing and/or aloud.
- Teachers provide adaptation and/or modification of classroom material and/or of the amount of work assigned, reduction of paper and pencil tasks, provision of taped or highlighted texts, outlines, a scribe, division of work into short, sequential steps with opportunities for reinforcement, and feedback at the end of each step.
- Supplementary materials are provided as needed.
- Students are encouraged to utilize sensory items and strategies within the classroom and to take sensory breaks when needed.
- Pathways Academy supports students in listening and following directions with the use of eye contact, repeated directions, gentle reminders, multimodal instruction and cueing, and through the use of examples.
- Pathways Academy staff members break down instructions into steps, break down information into manageable chunks, keep verbal instructions simple, and use positive reinforcement on a consistent and continued basis.
- Expectations are individualized to the needs of each student and can be adjusted in an ongoing manner throughout the day if needed.
- Pathways Academy staff provides ongoing support and structure, teaches to student strengths, uses high impact visual aids, and provides frequent positive encouragement.
- Clinical staff members are available to students at all times throughout the school day to assist students with the development and use of coping strategies and to help students process events or issues as needed.
- In addition, all staff members are able to assist students with social-emotional processing and understand that supporting a student around social-emotional needs often takes precedence over academics.
- Clinical staff provide guidance on meeting the social-emotional needs of students during weekly team meetings and during monthly Clinical Rounds.

Physical Education

Students participate in physical education class once a week, covering the fundamentals of non-competitive team sports as well as team building and group activities. Activities are adapted to meet student interests, abilities, and specific needs. In addition, students are given the opportunity to use the McLean Hospital Fitness Center on a weekly basis.
Transition Planning/ Prevocational/Vocational/Career Education
Pathways Academy’s Transition Planning/Life Skills program is individualized for each student. Pathways Academy staff members work with students and their IEP teams to develop a transition plan and work on pre-vocational and career skills.

Pre-Vocational skills
Many of the skills required for any vocation are social in nature and are therefore addressed throughout the school day by all school staff. Pre-vocational skills are addressed in various forms in all classes. In classes such as Social-Pragmatics, Health, and Transition Planning/Life Skills there is a specific focus prevocational topics and skills. Examples include but are not limited to:

- Understanding and accepting ‘work times’ and ‘relax times’ of day
- Sustaining attention to tasks
- Independently recognizing feelings of anxiety, frustration, and anger in self
- Taking part in non-preferred tasks without complaining/arguing/negotiating
- Asking for help when it is needed, working independently when possible
- Increasing independence in following multi-step directions
- Accepting feedback and suggestions
- Reading time on a variety of clocks/watches/phones
- Understanding various forms of authority
- Regularly demonstrating social niceties
- Attending to personal cleanliness/hygiene
- Exploring self-awareness- learning about strengths and challenges.
- Making small decisions independently
- Demonstrating self-advocacy skills (i.e. indicating preferences, asking for accommodations)
- Demonstrate safety skills in community (strangers, community interactions, emergencies)

Vocational Skills
- Vocational Skills are addressed within Social-Pragmatics classes, i.e., social expectations of the workplace, following instructions, asking for clarification or assistance, accepting feedback in an expected manner, self-advocating in a expected manner, understanding what managers are looking for in employees, etc.
- Students learn vocational skills in Transition Planning/Life Skills classes as well; identifying desirable vocations, comparing your skill set to those required by the job, understanding what ‘on the job training’ means, interviewing skills, resume writing, navigating a new space, planning for transportation, planning for meals, planning for attire, time management, the importance of being prompt, etc.
- In Culinary Arts class, students learn kitchen and food handling skills.
- Many students participate in Community Service projects within the school and when possible, on the McLean campus. Through community service work, students learn about the importance of service to others and need for giving back to the community. Students learn how to add community service experiences to their resume.
Career Exploration
Through Transition Skills/Life Skills classes, students learn about the importance of coming to school and working hard in order to be successful. Students explore interests and learn about a wide array of jobs; working to identify potentially desirable vocations/occupations based on interest:

- Students explore the educational and skill-based requirements of various jobs and identify experiences that will help prepare them for the work world.
- Post-secondary and vocational options for education are explored in groups and individually with students as needed.
- If determined to be appropriate by the student’s IEP team, Pathways Academy staff can assist in exploring dual-enrollment options and can assist in the process.
- Pathways Academy staff members assist students with identifying community and/or volunteer experiences to pursue outside of school that will help build experience and skills.

Support for English Language Learners
Pathways Academy is dedicated to ensuring the meaningful participation of students with limited English proficiency and welcomes eligible students with limited English proficiency to apply for admission.

- All students at Pathways Academy are offered equal opportunity to access and participate in the program’s services and activities regardless of English proficiency level.
- Pathways Academy works closely with school districts to implement necessary program modifications and support services to identify and effectively English Language Learners.
- English Language Learners will receive sheltered content instruction and additional instruction in English as a Second Language (ESL) from a certified ESL teacher unless the student’s IEP specifies otherwise.
Transportation
Sending school districts provide transportation to and from Pathways Academy. Pathways Academy provides the school district, transportation companies, and parents with daily schedules for arrival, departure and vacation days. It is the responsibility of parents to call the transportation company to report absences or changes in dismissal arrangements. Pathways Academy staff members meet and escort students to and from their vans. Pathways Academy staff transport students in McLean Hospital vans for scheduled community outings.

Braille Needs
Pathways Academy works with sending districts to provide Braille materials if indicated in IEP.

Assistive Technology
Pathways Academy’s adaptive/assistive technology is available to all students and includes, but is not limited to, iPads, desktop computers, laptop computers, tablets, LCD televisions, projectors, and audio players. In the event that an enrolled student has a visual, hearing, or other impairment, Pathways Academy will coordinate efforts with his/her school district to obtain adaptive equipment as per the student’s IEP, which may include Braille materials.

Communication Needs
Pathways Academy ensures that all students, including deaf and hard of hearing students, receive appropriate services to meet their communication needs. These services include, but are not limited to, Speech and Language therapy, assistive technology, social pragmatic classes and staff guidance and intervention during social interactions.

Occupational Therapy:
The Occupational Therapy department provides services including, but not limited to, individualized therapy for gross motor skill development, fine motor skill development, motor planning, sensory modulation, handwriting, and keyboarding. In addition, self help and daily living skills, such as simple meal preparation, self care, personal hygiene, folding laundry, and various household chores can be addressed within a student’s individual therapy sessions or within the classroom.

Recreation Services
If a student’s IEP requires that he or she receive recreation services, Pathways Academy will work with the sending school district to ensure that the student receives the appropriate services and/or equipment. Pathways staff will work with the student to determine specific needs and to develop and implement a plan to work toward recreation goals and objectives during the school day. Pathways Academy has dedicated outdoor space for recreation, an indoor dayroom, an indoor gym, and a fitness center. In addition, the McLean campus includes wilderness trails and walking paths. A variety of sports equipment, board and computer games, student-based activities, craft materials, and opportunities for interaction are available to students.

Parent Training and Counseling
Pathways Academy has a Parent Advisory Group (PAG) that offers opportunities for parent training at twice yearly PAG meetings on topics such as social pragmatics and sensory integration. Pathways Academy encourages parents to contact local agencies to pursue counseling or additional training resources.
School Health Services
The Pathways Academy school nurse and consulting physician provide school health services as necessary. McLean Hospital has a Medical Doctor on Call (MDOC), a walk-in clinic for emergency medical services and a Clinical Evaluation Center for emergency psychiatric services.

Speech and Language
Pathways Academy’s Speech and Language Therapists (SLPs) address expressive/receptive language needs, pragmatic communication issues, and executive function impairments in individual sessions as per student’s IEPs.

Sensory Integration
Sensory integration plans are developed for each student by the Occupational Therapists (OTs). Pathways Academy’s OTs provide individualized sensory integration training and support to students in the occupational therapy gym, classroom and/or milieu. All Pathways Academy staff members are trained to assist students with sensory integration activities. A music room is available to students during sensory integration breaks.

Not Offered by Pathways Academy
- Pathways Academy does not offer Mobility Orientation Training or Physical Therapy. In the event that a student’s IEP requires mobility training and/or physical therapy, the sending school district provides these services.
- Pathways Academy does not provide individual psychological counseling or rehabilitation counseling services to parents and/or students. Parents and students are encouraged to seek outside counseling if they are interested.
- Pathways Academy does not encourage or facilitate the interaction between enrolled Pathways Academy students and patients at McLean Hospital. This includes, but is not limited to, the use of other unit’s facilities. In addition, Pathways Academy does not promote or participate in gatherings with school groups or agencies other than Pathways Academy. Pathways Academy does not have extracurricular activities beyond the traditional school day.
- Pathways Academy does not offer individual tutoring of students; however, staff members assist students with individual learning needs within the classroom as needed.
- Pathways Academy does not offer neuropsychological testing or testing beyond the mandatory three year psycho-educational assessment (cognitive and academic) or any other service not indicated in our pricing contract. In the event that additional services are required as per a student’s IEP, it is the responsibility of the sending school district to arrange and fund said services.
- Pathways Academy does not provide specific social work services outside of assisting with the transition planning process.
3. Legal and Financial Status (Criterion 2.1)

David Lagasse is the Chief Financial Officer for McLean Hospital. Pathways Academy maintains a current program budget and a list of the tuition rates for all publicly and privately funded students attending the school, including students from outside Massachusetts.
4. Approvals, Licenses, Certificates of Inspection (Criterion 2.2)

Pathways Academy maintains, and posts in the main office, current licenses, approvals, and certificates of inspection by state and local agencies for safety inspection (building inspector), annual fire safety inspection (Belmont Fire Department), lead paint inspection, public health, asbestos inspection, and PCB inspection/containment plan.
5. EEC Licensure (Criterion 2.3)

Pathways Academy program is a Day Program and this requirement does not apply.

Pathways Academy maintains a comprehensive Policy and Procedures Manual on site, in a visible location, and provides annual written notice to parents of enrolled students that copies of the manual are available upon request.

The Policy and Procedures Manual contains all DESE required policy and procedures.
7. Reporting Suspected Child Abuse / Neglect to Department of Children and Families and to the Disabled Persons Protection Commission (Criterion 3.1(c))

Pathways Academy reports suspected child/student abuse or neglect to the Department of Children and Families (M.G.L. c. 119, §§ 51A and B) and for students over the age of 18, the Disabled Persons Protection Commission (M.G.L. c. 19C).

- Such procedures shall include notification to the Department of Elementary and Secondary Education when a report is filed against the program or its employee(s) or student(s).
- The Director is responsible for filing any reports of suspected child/student abuse or neglect and is the mandated reporter to the Department of Children and Families (DCF) or the Disabled Persons Protection Commission (DPPC).
- He/She provides training to all staff on this topic. The Educational Administrator is the designated person to file notification, via form 2, to the Department of Elementary and Secondary Education (and, when appropriate, notify the Disabled Persons Protection Commission, the Department of Mental Health (DMH), and/or the Department of Developmental Services (DDS)) when a report is filed against the program or its employee(s) or student(s).
- Any Pathways Academy staff member may independently report suspected child/student abuse or neglect to the Department of Children and Families.

Pathways Academy enrolls students ages 6 through 22. Section 51A of M.G.L. c.119 requires that any physician, medical intern, hospital personnel engaged in the examination or treatment of persons, medical examiners, psychologists, EMTs, dentists, nurses, chiropractors, podiatrists, optometrists, osteopaths, public or private school teachers, educational administrators, guidance or family counselors, day care workers or any person paid to care for or work with a child in any public or private facility, or home or program funded by the Commonwealth or licensed to provide day care or services to children, as well as public service personnel such as police and probation officers, clerk magistrates of the district courts, parole officers, social workers, foster parents, firefighters, office for the children licensor, school attendance officer, licensed allied mental health and human services professional drug and alcohol counselor, psychiatrist and clinical social worker, who, in his/her professional capacity, have reasonable cause to believe that a child under the age of eighteen (18) is suffering serious physical or emotional injury resulting from abuse inflicted upon him/her, which causes harm or substantial risk of harm to a child’s health or welfare, including sexual abuse, or from neglect, including malnutrition, or who is determined to be physically dependent upon an addictive drug at birth, shall immediately report such condition to the DCF by oral report and make a written follow-up report within 48 hours.

Hospital personnel may, in the alternative, notify the chief executive officer of the institution, or his/her designee, who must then assume responsibility for the reporting of such abuse. Hospital personnel are permitted to take photographs of the areas of trauma visible on the child who is the subject of such a report without consent of the parent or guardian. Any such photographs must accompany the report to DCF. Immunities exist to protect reporters from civil or criminal liability associated with good faith compliance with this statute except where the reporter is the aggressor. However, failure to comply with the reporting mandates could subject the person or institution of fines of up to $1000.00. Also frivolous reports shall be punishable by a fine of not more than
$1000.00.

Mandated reporters file reports by telephone to the DCF area office serving the child's hometown and ask for the protective screening unit.

- A description of the situation of possible abuse or neglect and identifying information about the family will be filed as part of the report.
- Mandated reporters are required to give their name, address and telephone number.
- Reports shall contain the names and address of the child and his/her parents or other persons responsible for his/her care, if known: the child’s age, sex, nature and extent of child’s injuries, abuse, maltreatment or neglect, including evidence of prior injuries, abuse maltreatment or neglect, the circumstances under which the reporter became aware of the child’s injuries, whatever action was taken, if any, to shelter or otherwise assist the child, and any other information that shall be required by the department.
- If a child has died as a result of such injuries, abuse, neglect or maltreatment then the mandated reporter shall notify DCF, the District Attorney for the county in which such death occurred, and the medical examiner’s office.
- In situations where the filing of a 51A Report is being considered based primarily on a parent or guardian’s unwillingness to take a child home from the hospital and consensus regarding the discharge plan cannot be resolved, notification should be made first to the Department of Mental Health’s Division of Child/Adolescent Services at (617) 626-8090. For those children and adolescents who receive services through the Massachusetts Behavioral Health Partnership, notification should also be made to the Partnership. Memos regarding this new procedure follow.
- Any privilege relating to confidential communications between psychotherapists, (psychiatrists, social workers, or psychologists), and patients shall not prohibit the filing of a report.
- Reports are managed by the area office, which covers the town where the patient resides, weekdays from 9:00 a.m. to 5:00 p.m. call the Child Abuse and Neglect Hotline at 1-800-792-5200, and they will refer you to the appropriate office. After 5:00 p.m. or on weekends, the report will be managed by the Hotline.

Disabled Person Protection Commission (DPPC) M.G.L.c.19C: Pathways Academy may enroll students between the ages of 18 and 22. The DPPC is an independent state agency created to protect disabled adults from abuse. “Disabled person” is defined as a person between the ages of eighteen (18) to fifty-nine (59) inclusive, who is mentally retarded, as defined by M.G.L.c.123 s.1), or who is otherwise mentally or physically disabled, and as a result of such mental or physical disability is wholly or partially dependent on others to meet his/her daily living needs. Patients in psychiatric facilities are considered disabled persons for purposes of this statute.

- Physicians, medical interns, hospital personnel engaged in the examination, care or treatment of persons, medical examiners, dentists, psychologists, nurses, chiropractors, podiatrists, osteopaths, public or private school teachers, educational administrators, guidance or family counselors, day care workers, probation officers, social workers, foster parents, police officers or persons employed to provide services to disabled persons, who have reasonable cause to believe a disabled person is suffering from a reportable condition must report such suspected condition to the DPPC.
For purposes of chapter 19C “abuse” is an act or omission which results in serious physical or emotional injury to a disabled person, however, no person shall be considered abused for the sole reason that such person is being furnished or relies upon treatment in accordance with the tenants and teachings of a church or religious denomination by a duly accredited practitioner.

A reportable condition is a serious physical or emotional injury resulting from abuse including non-consensual sexual activity.

A mandated reporter need not report an otherwise reportable condition if the disabled person invokes a privilege to maintain the confidentiality of such mandated reporter. This includes the psychotherapist patient privilege and absent consent from the disabled person.

A mandated reporter shall not report such condition and disclose privileged information.

Mandated reporters must notify the DPPC orally of any reportable condition immediately upon becoming aware of such a condition, and shall report in writing within 48 hours after the oral report.

Mandated reporters are immune from civil or criminal action for good faith reporting under the statute, provided that they did not perpetrate such abuse. However, failure to report in conformance with this statute may result in a fine of up to $1000.00.

Mandated reporters who have reasonable cause to believe that a disabled person had died as a result of a reportable condition shall immediately report such death to the commission, to the district attorney for county in which such death occurred, and to the medical examiner’s office.

Reports should be made to the DPPC at 1-800-426-9009. This 800 number may also be used for reporting cases after hours, on weekends or on holidays.

Upon receipt of a report of abuse the DPPC must conduct an investigation within 24 hours if there appears to be immediate danger of further abuse, and within 10 days for all other cases. The DPPC may refer the case to DMH for investigation.

The DPPC may arrange for protective services as well as petition the court for appointment of a guardian or conservator.

During the commission’s investigation of such suspected abuse, if the abused persons psychiatric records are requested, written consent from the patient must be provided by the investigator. Absent such consent, documents that are protected by the psychotherapist’s client privilege shall not be subject to disclosure.
8. Evacuation and Emergency Procedures (Criterion 3.1(d))

Drills
- Pathways Academy conducts at least 4 evacuation/fire drills per year under the direction of
  the Belmont, MA Fire Department
- Pathways Academy conducts at least 2 enhanced lockdown drills per year

Helping Students Understand the Nature and Importance of Drills
- The Milieu Manager and Educational Administrator will meet with every classroom 2 times a
  year to review the emergency drill protocol and the nature of the drills.

Special Provisions for the Evacuation of Mobility-Impaired Students
- An assigned teacher evacuates a child on crutches or in wheelchair via front entrance ramp.
- The student and teacher join the rest of the school in the designated meeting area.

Drill Log
- A written log of each evacuation drill that includes date, time elapsed, participants (students
  and staff), witnesses, etc. is kept in the main office.

Staff Assignments
- During all emergencies the Milieu Manager, Assistant Milieu Manager or designee may act as
  the “Crisis Response Leader” (CRL).
- The Crisis Response Leader will act as the liaison with McLean Security and/or Belmont
  Police or Fire Department. If possible, they will meet with the Pathways Academy Team
  Leaders to disseminate any available information.
- The Crisis Response Leader will delegate responsibilities and tasks as necessary. When
  notified to do so by the CRL, the Education Administrator will coordinate parent/guardian
  contact for all students.

Alarm and Signals
- Fire Alarm – for fire emergencies
- “Lockdown” on walkie talkie – for life threatening intruder

Notification of Appropriate Persons/ Emergency Telephone Numbers
- In the event of an evacuation and/or emergency situation, Pathways Academy staff will
  immediately contact McLean security (x2222 on the Belmont campus).
- McLean security will contact the Belmont Police or Fire Department via their direct
  emergency phone.
  - 617-855-2121 Non-Emergency - McLean Hospital Security
  - 617-855-2222 Emergency - McLean Hospital Security - Fire, Police, Rescue
  - 9-1-800-682-9211 Poison Control Center
  - 9-1-617-484-3473 Local Fire Department
  - 9-1-617-484-1215 Local Police Department
  - 9-1-617-499-5025 Local Emergency Room – Mount Auburn
• Pathways Academy will notify parents and guardians of an emergency once the situation is deemed over and it is safe to do so.

Notification of Life-Threatening or Serious Emergency Requiring Immediate Medical Attention

• The closest staff member will call extension x2222 and will alert McLean Hospital Security that the medical doctor on call (MDOC) is required.
• The Milieu Manager and/or Assistant Milieu Manager or designee and the School Nurse will then be notified immediately.
• The MDOC will arrive via McLean Security vehicle and assess the student; he or she will then determine the appropriate course of action.
• The Milieu Manager or designee will notify parents/guardians.

Evacuation Routes and Procedures

• When at all possible staff and students should get out of the building/vicinity in which the incident is occurring
• In the event of a fire staff and students should meet on the basketball court located in the backyard of East House
• If the building is deemed unsafe for reentry for an extended period of time, all students and staff go to the DeMarneffe cafeteria building.
• Notification to return is transmitted to the Milieu Manager or designee by McLean Hospital Security and/or the Belmont Fire Department or Police Department.
• If students must be sent home, parents are notified to pick them up at the DeMarneffe building.
• In the event of a Lockdown, staff and students should meet at one of the two the Rally Points
  ○ The Arlington School (on McLean Hospital campus)
  ○ The Highland Meadow Cemetery (adjacent to McLean Hospital on Concord Avenue)
• At the conclusion of a Lockdown event, if necessary, students should be picked up by their buses, parents or guardians at the Reunification Point
  ○ Belmont Public High School (221 Concord Avenue)

Postvention

In the event of an Evacuation and/or Emergency at Pathways Academy the following plan will be enacted:

A. General Mental Health Needs
   a. Students: Students are supervised while at Pathways Academy. Staff members who observe concerning behavior contact a member of the clinical team to meet with the student in question. If the clinical team member deems necessary they will contact the family.
   b. Students’ Families: Pathways Academy staff members do not provide therapy to family members of students. Pathways Academy staff can act to mediate issues of concerns between students and their families as it pertains to Pathways Academy. When necessary, Pathways Academy staff members may recommend that family members of students seek out individual or family therapy. Pathways Academy staff can assist in locating a provider.
c. All Staff (including, but not limited to teachers, school counselors, clinicians and administrators): Staff members are encouraged to share concerns, including concerning behaviors of their peers, with their direct supervisor. Staff members may contact the Human Resources department to address concerns. The McLean Employee Assistance Program is available to address concerns.

B. Acute Mental Health Needs
   a. In the event of a major acute incident, Pathways Academy will enlist doctors and mental health workers from the McLean community to meet w/ our students, students’ families, staff and administration.
   b. Pathways Academy hours will be expanded.
   c. Notifications of extended hours and mental health services will be made via e-mail and posted on our website.

Staff Training
- **Evacuation Drills** - conducted at least two times per year to ensure that all staff and students are able to leave the building safety.
- **Emergency Drills** - conducted at least 4 times per year under varied conditions, to assure that all personnel are trained to perform assigned tasks and that all personnel are familiar with emergency procedures including but not limited to the use of firefighting equipment in the building.
- Staff are trained yearly by McLean Hospital on appropriate use of fire extinguishers.
- A detailed map of Pathways Academy’s building layout is located in every room to denote the locations of extinguishers and alarm boxes.
- The implementation of the emergency protocol will be evaluated periodically to determine the effectiveness of the protocol and procedures and if changes are necessary.

Specific Incidents
**Fire Emergency**
- Pathways Academy conducts at least 4 unannounced evacuation/fire drills per year under the direction of the Belmont, MA Fire Department.
- Staff and students evacuate through the nearest exit and meet in designated area of the back yard by class.
- The Milieu Manager or designee records attendance and ensures all students are accounted for.

**Bomb / Improvised Explosive Device (IED) Threat**
- In accordance with the McLean Hospital policy Pathways Academy staff will attempt to keep person on phone and gather as much information as possible.
- Pathways Academy staff will signal another person in the area to call 2-2-2-2 and report Bomb Threat and begin evacuation of Pathways Academy to the DeMarneffe cafeteria building.
- Per McLean Hospital policy, security will initiate the McLean Hospital Bomb Threat Evacuation Protocol, including but not limited to, contacting local law enforcement agencies.
Active Shooter / Armed Assailant

- In accordance with McLean's Active Shooter Policy and Procedure, and aligned with the Run, Hide, Fight model Pathways Academy uses the A.L.I.C.E. (ALERT LOCKDOWN INFORM COUNTER EVACUATE – does not have to occur sequentially) protocol.
- The Milieu Manager and Educational Administrator will meet with every classroom 2 times a year to review and practice the Lockdown protocol.
- Staff and students will leave the building via the closest exit.
- In the event that during a Lockdown event staff and students are unable to evacuate the building/vicinity staff and students should initiate an Enhanced Lockdown
  - If an incident requires staff and students to remain inside the building, staff will activate a “lockdown”.
  - Staff should call x2222 to alert McLean Hospital Security of the incident. The Milieu Manager or designee will call x2222 to alert McLean Hospital Security of the incident when they have been made aware of said incident.
  - McLean Security will alert the Belmont Police Department if necessary.
  - The word “lockdown” followed by available information in the incident will be announced via walkie-talkie to alert and signal all staff and students.
  - This will alert all staff and students that if evacuation is not possible they are to remain in the room, or go to the nearest room, close the door and lock it if possible, and pull down the shade and/or cover vision panel and turn off the lights.
  - Staff and students should barricade the door.
  - Staff and students should spread out as much as possible outside the line of sight from the door and behind a solid wall.
  - Staff and students should locate and obtain an object that can be thrown at the armed intruder if necessary.
  - Staff should listen for information and continually reevaluate evacuation and enhanced lockdown options.
  - Staff should take attendance
  - The Milieu Manager will walkie-talkie “All Clear” to alert staff and students that they may return to their regularly scheduled activities.
- In the event of a gas leak, flood, or other such event that calls for an evacuation of the building Pathways Academy will follow the fire drill evacuation plan.
9. Health Care Manual (Criterion 3.2 / 16.1 [2001-02])

Pathways Academy maintains a healthcare manual on site and provides written notice to parents of enrolled students that copies of such healthcare policies are available upon request.

The school nurse is involved in the development, review and approval of the school’s healthcare policies. The consulting school physician is also involved in the development, review and approval of the school health care policies. Review and revision of these health care policies and procedures will occur as needed, but at least every two years. The manual is readily available to all staff and is located in the nurses’ office. The healthcare manual contains a letter/memorandum documenting the approval of its contents by the school nurse and consulting school physician.

The following policies and procedures are included in the manual:

- Reporting Suspected Child Abuse / Neglect to DCF and to DPPC (Criterion 3.1(c))
- Evacuation and Emergency Procedures (Criterion 3.1(d))
- In-Service Training Plan and Calendar (Criterion 12.2)
- Food and Nutrition (Criterion 14.2)
- Toileting Procedures and Individual Plans (Criterion 14.3)
- Physician Consultation (Criterion 16.2)
- Nursing (Criterion 16.3)
- Emergency First Aid and Medical Treatment (Criterion 16.4)
- Administration of Medication (Criterion 16.5)
- Administration of OTC Medication
- Administration of Antipsychotic Medication (Criterion 16.6)
- Preventative Health Care (Criterion 16.7)
- Receipt of Medical Treatment – Religious Beliefs (Criterion 16.8)
- Student Allergies (Criterion 16.11)
- Smoking and Tobacco (Criterion 16.12)
- Lice (Criterion A)
- Absent & Late Arrival (Criterion C)
- Emergency Contacts (Criterion G)
- Sick Student Policy (Criterion H)
- Injury Prevention Plan (Criterion O)
- Prevention and Control of Infectious Diseases (Criterion P)
- Infection Control Procedures (Criterion Q)
- Student Hygiene (Criterion R)
The following additional information is included in the manual:

A. 105 CMR: DEPARTMENT OF PUBLIC HEALTH

B. Medical Forms

   I. Emergency Care Plan and Medication Administration for Life Threatening Allergies
   II. Medication Order
   III. Emergency Care Plan for Seizure Disorders
   IV. Asthma Action Plan
   V. Mass DESE Form 2 Public and Private Day Incident Report
   VI. Report of Epinephrine Administration
   VII. Individual healthcare Plan for Student with Diabetes Guidelines

C. 2017 – 2018 information

   I. List of students and medications
   II. List of students and allergies
   III. List of Medication Administrators
   IV. List of EpiPen Administrators
   V. List of School Medical Plans
   VI. Current School Physician
   VII. Medication Error Report
10. Aspects of Program, Staff Credentials and Students Records (Criterion 4.1 [2001-02])

Pathways Academy makes all aspects of the program available to the DESE, including but not limited to, the certification and credentials of its staff and the individual records of enrolled students.
11. Public Information and Postings (Criterion 4.2)

Pathways Academy displays a statement of purpose, a general description of the educational program, an organizational chart, the current tuition rate, documents granting authority to operate, and all required policies and procedures in the main office for public review.

- First aid procedures, emergency procedures, and emergency telephone numbers are posted in each classroom.
- The current DESE approval certificate is displayed in the school’s main hallway.
12. Publicly Available Information (Criterion 4.3 [2001-02])

Pathways Academy posts and maintains in the main office the following:

- Safety Inspection of all buildings by the Department of Public Safety or the local building inspector
- Health inspections
- Fire Safety inspection from the local fire department
- Asbestos inspections
- PCB inspections
- A report demonstrating compliance with childhood lead poisoning prevention and control law and regulation, when applicable
- Pathways Academy’s policy and procedure manual
13. Advanced Notice of Proposed Program / Facility Change (Criterion 4.4)

In the event of any new policies/procedures and/or changes in current policies and procedures:

- The Pathways Academy Educational Administrator will notify the Department of Elementary and Secondary Education (DESE) using Form 1 as well as school districts and parents of current students, once the change has received DESE approval.
- The Pathways Academy Educational Administrator also notifies DESE via Form 1 prior to substantial change to the program, providing written notification of intent to change.
- Notice will be given with sufficient time to allow the DESE to assess the need for the proposed change and the effects of such change on the educational program.
- The Pathways Academy Educational Administrator will also provide written notification to the DESE via Form 1 of any sudden and/or unexpected changes that may impact the overall health or safety of students and/or the delivery of services required by IEPs.
- Immediate notification via Form 1 will be provided to the Department for: unexpected building changes as the result of an emergency; change in program's financial status that impacts either the health and safety of students or the service delivery to students; and closure of a program.

Pathways Academy will provide the DESE with 15 working days notification for:

- Each 10% decrease in student enrollment based upon last ESE approved student enrollment
- Change in program's ownership; change in program's name
- Vacanc(ies) in approved staff positions not filled by another appropriately licensed or waived staff person, and that have a direct impact on the service delivery to students

Pathways Academy must obtain the Department’s prior approval before the following changes occur:

- Changes to school building(s)/physical facilities that are not due to an emergency, but are related to relocation and/or expansion of building(s)
- Changes made by the program to ESE required policies and procedures that result in continued adherence to regulatory requirements

Pathways Academy must obtain the Department’s prior approval from before the following changes occur:

- request to increase or decrease the ages of the students being served
- request to change or add gender of students being served
- each 10% increase in student enrollment based on last approved ESE student enrollment
- adding, eliminating, or changing staff positions
When it is anticipated that a change in Pathways Academy’s program will result in a request for tuition adjustment, through one of the following avenues:

1. Program Reconstruction Application
2. Special Circumstances Request for Salary Upgrades

Then Pathways Academy will document to the Department that:

- It has informed all purchasers of the change and any potential for a resulting tuition adjustment before October 1st of each year to be considered for rate adjustments to go into effect the following fiscal year;
- Provide a listing of the public school districts in which the program’s students currently reside, the number of students from each school district and the annual tuition increase impact on each school district;
- Provide a Master Staff Roster clearly indicating changes in FTE’s as a result of the substantial change (i.e., increase or decrease in student enrollment) and a corresponding Program Budget.

Additionally, for Program Reconstruction Applications, Pathways Academy will document to the Department with a notice that:

- It has invited comment from all purchasers regarding such change(s)
- It has considered and responded to all comments
- Provides a written summary of all substantial changes that have occurred within Pathways Academy over the past year
14. Immediate Notification (Form 2) (Criterion 4.5)

Pursuant to applicable regulations and agency policy, the Pathways Academy Educational Administrator, or designee, is responsible for providing immediate notification to ESE via Form 2 for serious incidents that occur during school hours for ALL students enrolled in the program (including Massachusetts students, out-of-state students and privately funded students) except for Emergency terminations which is for both school and residential hours.

- Form 2 and supporting documentation will be electronically uploaded to ESE through the Web-Based Management System (WBMS) located within the Security Portal found at https://gateway.edu.state.ma.us
- The Security Portal can also be located in the pull down menu on the DESE webpage (www.doe.mass.edu).
- The school’s Director, Educational Administrator, Milieu Manager, and Team Leaders have access to the information required to log in to the Security Portal.

When a Form 2 is filed, immediate notification will be made to the following parties:
- Parents/guardians
- Responsible school district’s Special Educational Administrator
- Any state agency involved in student’s care or placement (by telephone & letter)
- Department of Elementary and Secondary Education (by telephone and Form 2)

Pathways Academy will follow the procedures as required in WBMS that specify required information and documentation to be submitted for each Form 2 to be considered complete.

- Pathways Academy will follow the Form 2 electronic requirements included in WBMS and submit required information and documentation as it is reviewed by ESE and respond to any requests made by the Department for any additional necessary information.
- All incident reports are maintained in the student’s record.
- Should there be a death of a student, the program will provide immediate verbal and electronic notification to the student’s parents/guardians, responsible school district, and, if applicable to any state agency involved in the care of the student.

Pathways Academy will provide immediate electronic notification concerning incidents during school hours (except for Emergency terminations which are for both school and residential hours):
1. The death of any student; (Immediate verbal and written notification to the student’s parents/guardians and school district)
2. The filing of a 51-A report with Department of Children and Families (DCF) OR a complaint filed with the Disabled Persons Protection Commission (DPPC), against the school or a school staff member, for abuse or neglect of any student;
3. Any action taken by a federal, state, or local agency that might jeopardize the school’s approval with ESE (i.e.- federal or state investigation, closure of intake) ;
4. Any legal proceeding brought against the school or its employee(s) arising out of circumstances related to the care or education of any of its students;
5. The hospitalization of a student (including out-patient emergency room visits) due to physical injury at school or previously unidentified illness, accident or disorder which occurs while the student is in the program;

6. A student run from the program;

7. Any other incident of a serious nature that occurs to a student or staff in the program. (Some examples include: any police involvement, any media involvement, weapons, fire setting, alcohol or drug possession or use while in the program)

8. For the emergency termination of a student pursuant to 603 CMR 28.09 (12)(b) during both school and residential hours
15. Student Admissions (Criterion 5.1)

Copies of the Pathways Academy Policies and Procedures Manual are maintained on site and are provided to the student (if appropriate), parents/guardians, and sending school district prior to admission of the student.

- Pathways Academy provides annual written notice to the parents of the enrolled students that copies of its policies and procedures manual are available upon request.
- Admissions policies and procedures are made available to parents and students at anytime upon request.

Admissions Criteria
Pathways Academy serves children who need a specialized program that will provide active instruction in Social Pragmatics as a core subject and a curriculum taught at the competency level of each student with sensory integration opportunities interwoven throughout the school day. Admission is an individualized and comprehensive process:

- Pathways Academy serves students 6 through 22 years of age with diagnoses of neurodevelopmental disorders including Autism Spectrum Disorders, Sensory Processing Disorder, Non-Verbal Learning Disorder, Anxiety Disorders, socialization and peer-relations problems, and school phobias, with or without co-occurring psychiatric disorders.
- Pathways Academy accepts students who are nonviolent and are able to participate and benefit from our academic and pragmatic curriculum.
- Many applicants may have a secondary or co-occurring psychiatric disorder such as ADHD, Bipolar Disorder, Depression, Anxiety Disorder, and Learning Disorders.
- Pathways Academy does not serve students who need an ABA program or have a primary diagnosis of:
  - Emotionally Disturbed
  - Behaviorally Disordered

Admissions Procedures
The application process begins with a school district sending Pathways a packet of information on the applying student.

- The referral packet includes, but is not limited to a current IEP and the student’s most recent evaluations.
- The Pathways Academy Intake Team (IT), including, but not limited to the Admissions Coordinator, Educational Administrator and Program Director, reviews the packet.
- If necessary, with parental and/or guardian consent, the Admission Coordinator will contact outside providers and past placement(s) to obtain additional information about the candidate.
- After reviewing all available information, the IT determines if a student may be a possible candidate.
Parent Visit
If the student is deemed a possible candidate, the parents and/or guardians are invited in for a tour and a meeting with the IT.
- During said meeting the Director, or designee, will review Pathways Academy’s purpose, services and policies regarding student and parent and/or guardian rights including student records, the health program including the procedure for providing emergency healthcare, and the termination of a student.
- During the parent and/or guardian tour and the subsequent candidate tour, the parent and/or guardian and the student will have the opportunity to see the facilities, meet the staff members and other enrolled students.

Student Visits
After the initial parent and/or guardian meeting, if the student is still deemed an appropriate candidate for Pathways Academy the student is invited in for a “short visit”. Prior to the visit the visitors’ parent/guardian will be required to fill out a Student Visitor Packet.
- At the onset of that visit the candidate will meet with the Admission Coordinator for a tour and at such time he/she will be assigned a point person.
- The student with the aid of their point person will join classes.
- At the completion of the initial visit the candidate will meet with the Admissions Coordinator. If the candidate is deemed to continue to be an appropriate candidate the student will come in for a longer visit.
- During the second visit the candidate will not be assigned a point person.
- After each visit the Admission Coordinator will meet with the prospective team of the candidate to review the visits. If, at any time during this process, Pathways Academy staff members deem the student not to be an appropriate candidate for Pathways Academy, the process will stop and the Admission Coordinator will notify the sending School District and the parent(s) and/or guardian(s).

Acceptance
If, at the end of the admissions process, a student is deemed to be an appropriate candidate for Pathways Academy, the Admissions Coordinator informs the parent/guardian and sending school district that their student has been accepted. A formal acceptance letter will be sent to the parent/guardian and the sending school district.

Information Required from Referring School Districts
The application process begins when Pathways Academy receives a referral packet from a sending school district. The referral packet contains information on the applying student which includes, but is not limited to, a current IEP and the student’s most recent evaluations.

Required Documentation Prior to Admission
All required annual consent forms must be completed/returned prior to start date:
- Completed Pathways Academy consent packet
- Student must have a signed, current IEP
- Physical examination (within previous 12 months) completed by a licensed physician.
- In the event of an emergency placement, Pathways Academy will make provisions for a complete examination of the student within 30 days of admission.
Prior to admission and upon request, the Director of Pathways Academy, or designee, is available to student’s parents/ school district personnel for an interview, including an opportunity for the student and parent to see the facilities, meet staff members, and to meet other enrolled students; an explanation of the schools’ purpose and services; and an explanation of student/ parent rights policies, including: student records, health program, procedures for providing emergency health care, and procedure for terminating placement.

**Student Medical Care during a Visit**

For purposes of potential medical needs, a visiting potential student is thought of in two phases:

- A child, accompanied by his/her parent/guardian, touring the school/ learning about the program with intention of investigating Pathways Academy for attendance is considered a visitor.
  - Should such a child have any potential medical need (examples include an EpiPen for anaphylaxis, inhaler for asthma) it is solely the responsibility of the parent/guardian to attend to these needs.
  - School Nursing is not involved in medical care issues and is unable to administer/provide Tylenol or Ibuprofen.
- In the phase(s) beyond the initial tour with a parent/guardian in which a visiting child comes to the school for a short duration of time within the school, School Nursing may be available to assist with potential needs to best ensure the success of the visit for the child to facilitate determination if the child and school are a fit.

**Intake Form**

Parents are asked to complete a short intake form in advance of his/her child’s trial visit.

- Information for nursing purposes includes whether the child has a prescribed EpiPen and/or an inhaler, and whether the parents foresee a possibility the nurse may need to administer a prescription medication.
- Parents are also asked to list child’s allergies, medical conditions, medications taken.
- Parent or guardian permission for administration of Tylenol or Ibuprofen for minor discomfort and emergency medical treatment is sought.
- In cases in which a parent/guardian documents potential need for an inhaler, an EpiPen or some other potential need for prescribed medication the form is then given to School Nursing to follow up with the family prior to the visit.
16. Admissions Packet (Criterion 5.1(a))

Pathways Academy has a comprehensive Admission Process. Pathways Academy maintains copies of our Policies and Procedure manuals in the Main Office as well as in the offices of the Administrative Team (including, but not limited to, the Educational Administer and Program Director). Parents and/or guardians of currently enrolled students are made aware via a letter that such copies are available on site and upon request. Pathways Academy accepts students who are nonviolent and are able to participate and benefit from our academic and pragmatic curriculum. Pathways Academy serves students 6 through 22 years of age with diagnoses of neurodevelopmental disorders including Autism Spectrum Disorders, Sensory Processing Disorder, Non-Verbal Learning Disorder, Anxiety Disorders, socialization and peer-relations problems, and school phobias, with or without co-occurring psychiatric disorders.

Prior to admission Pathways Academy provides to the parents and the local school district a written copy of the school's policies and procedures, including the 17 Required Admission Criteria 603 CMR 18.05(1)(b)(1-17):

1. The school's statement of purpose;
2. The type of services provided;
3. Admission criteria;
4. Parents' rights as described in 18.05(4);
5. Health care, including provisions for emergency health care and/or hospitalization as described in 18.05(9);
6. Planning for both foreseen and emergency terminations as described in 18.05(6), (7);
7. Discipline and behavior management, including physically abusive behavior by a student to himself/herself or others, and proper use of non-violent restraints as described in 18.05(5);
8. Activities related to daily living skills;
9. Contractual obligations with regard to payment for services. Pathways Academy will inform in writing any party, other than a local school district, responsible for placement of a student that said party is financially responsible for any costs incurred as a result of any placement not made pursuant to the requirements of 603 CMR 28.00;
10. Clothing requirements;
11. A description of normal daily routines;
12. Any specific treatment strategy employed by the facility;
13. A description of any normally occurring religious practices;
14. Visiting hours and other procedures related to communication with students and the facility as described in 18.036(9);
15. Name/telephone number of a staff person whom parents may contact on an ongoing basis;
16. A description of a procedure which the parents or student may use to register complaints regarding the student's education and care at the facility.
17. A copy of the approved school calendar.

Parents are provided with a description of the procedure which the parents or student may use to register complaints regarding the student's education and care. A copy of the approved school calendar is also provided.
17. Policies and Procedures for Coordination/ Collaboration with Public School Districts
(Criterion 5.2 [2001-02])

Pathways Academy works collaboratively with the placing school district to ensure that, to the maximum extent appropriate, students with disabilities are educated with students who do not have disabilities, are provided access to the general education program and are given opportunities to return to a less restrictive educational environment.
18. Contracts (Criterion 5.2(a))

Pathways Academy requires that each enrolled student have a current and signed written contract consistent with the requirements of 603 CMR 28.06(3)(f).

Each contract shall include, but not be limited to, the following terms:

- Pathways Academy will comply with all elements of the IEP for the student and will provide, in writing, to the Administrator of Special Education detailed documentation of such compliance through completion of required student progress reports;
- Pathways Academy will allow the placing school district to monitor and evaluate the education of the student and will make available, upon request, any records pertaining to the student to authorized school personnel from the school district and the DESE in accordance with 603 CMR 23.00: Student Records;
- Pathways Academy will allow the placing school district and/or the DESE to conduct announced and unannounced site visits and to review all documents relating to the provision of special education services to Massachusetts students at public expense.
- Access to documents for the placing school district will include general documents available to the public, documents specifically related to the student placed by such district, and other documents only to the extent they are necessary to verify and evaluate educational services provided at public expense;
- Pathways Academy will afford publicly-funded students all the substantive and procedural rights held by eligible students, including but not limited to those specified in 603 CMR 28.09, and will comply with all other applicable requirements of 603 CMR 28.00 and applicable policy statements and directives issued by the DESE.

Pathways Academy does not discriminate on the grounds of race, color, sex, gender identity, religion, national origin, sexual orientation, disability, or homelessness.
19. Daily Instructional Hours (Criterion 6.1)

Pathways Academy ensures that, unless a student’s IEP provides otherwise, each students receives 1188 hours of structured learning time a year, within the required 216 day school year schedule. Pathways Academy ensures that structured learning time is time during which students are engaged in regularly scheduled instruction, learning, or assessments within the curriculum of core subjects and other subjects.

Pathways Academy’s structured learning time includes, but is not limited to; directed study (activities directly related to a program of studies, with a teacher available to assist students); independent study (a rigorous, individually designed program under the direction of a teacher, assigned a grade and credit); technology-assisted learning; presentations by persons other than teachers, transition-related activities, state-wide student performance testing, social pragmatics activities; Speech and Language therapy, Occupational therapy and sensory integration activities.
20. Physical Education Requirements (Criterion 6.1(a))

Pathways Academy addresses student physical education requirements at all grade levels through a weekly “Physical Activity” class in which students participate in physical activities to promote physical wellbeing in a social pragmatics-based environment. Physical Activity classes are considered part of Pathways Academy’s structured learning time.
21. School Days per Year (Criterion 6.2 [2001-02])

Policy and procedure regarding the number of school days per year is outlined in School Days per Year (Criterion 6.4) of Pathways Academy’s Policy and Procedure Manual.
22. School to Work (Criterion 6.2)

Pathways Academy does not offer a school to work program.
23. School Days per Year (Criterion 6.4)

Prior to the start of each school year, Pathways Academy develops a 216 day school calendar with five additional school days built into the calendar to account for unforeseen circumstances or inclement weather. The calendar also indicates the last day of school for students graduating. Class schedules, which indicate type and frequency of class, are posted outside each classroom and in other locations around the school.
24. Curriculum Frameworks (Criterion 7.1)

Pathways Academy takes steps to provide all students with essential learning opportunities that prepare the students to reach the state graduation standards. Curriculum and instruction are aligned with the Massachusetts State Curriculum Frameworks and the Common Core Standards.
25. State / District Wide Assessments (Criterion 7.3)

Pathways Academy ensures that all enrolled students that reside in Massachusetts participate in the Massachusetts Comprehensive Assessment System (MCAS) testing. In accordance with each student’s IEP, he or she will participate in on-demand testing, with or without accommodations, or will participate in an alternative assessment portfolio.

The MCAS Alternate Assessment (MCAS-Alt) option is discussed and considered in all Team meetings for any Massachusetts student with a significant disability and/or who has previously failed the standard MCAS test. The Educational Administrator is responsible for assuring that all Massachusetts students participate in the MCAS and that they are being assessed appropriately.
26. High School Diplomas and Certificates of Attendance (Criterion 7.4)

Pathways Academy students that meet their high school graduation requirements are eligible to receive a diploma from their sending school district. Alternatively, students who do not meet graduation requirements are eligible to receive a certificate of attendance from their district. Pathways Academy students are given the choice to accept their diploma or certificate of attendance at a ceremony at Pathways Academy or at their sending school district’s ceremony. All students receive an annual certificate of achievement from Pathways Academy at the end of the year (or earlier if needed).
27. Implementation- Educational Services (Criterion 8.1 [2001-02])

Policy and procedure regarding the Implementation of Educational Services is outlined in Program & Student Description, Program Capacity (Criterion 1.2) of Pathways Academy’s Policy and Procedure Manual.
28. Implementation- Related Services (Criterion 8.2[2001-02])

Policy and procedure regarding the Implementation of Related Services is outlined in Program & Student Description, Program Capacity (Criterion 1.2) of Pathways Academy’s Policy and Procedure Manual.
29. Implementation- Supplementary Aid/Services (Criterion 8.3[2001-02])

Policy and procedure regarding the Implementation of Supplementary Aid/Services is outlined in Program & Student Description, Program Capacity (Criterion 1.2) of Pathways Academy’s Policy and Procedure Manual.
30. Program Modifications and Support Services for English Language Learners (Criterion 8.4)

Pathways Academy understands the responsibility to serve English Language Learners and welcomes such students to apply for admission.

- All students at Pathways Academy are offered the same opportunity to access and participate in the program’s services and activities regardless of level of English proficiency.
- Pathways Academy will work closely with school districts to identify and implement necessary program modifications and support services to identify and effectively serve English Language Learners.
- All program modifications and support services comply with applicable state law (M.G.L. c. 71A) and federal law (Title VI).
- English Language Learners will receive sheltered content instruction from a trained and qualified teacher and additional instruction in English as a Second Language (ESL) from a certified ESL teacher unless the student’s IEP specifies otherwise.
31. Current IEP and Student Roster (Criterion 8.5)

Pathways Academy maintains a current IEP for each student that has been issued by the sending school district, consented to, and dated by the student’s parent(s) / guardian(s) or student, when applicable. Pathways Academy maintains a current roster of all enrolled students including out of state and privately funded students.
32. IEP – Implementation (Criterion 8.6 [2001-02])

Policy and procedure regarding IEP Implementation is outlined in Program & Student Description, Program Capacity (Criterion 1.2) of Pathways Academy’s Policy and Procedure Manual.
33. IEP – Progress Reports (Criterion 8.7 [2001-02])

Policy and procedure regarding IEP Progress Reports is outlined in IEP – Progress Reports (Criterion 8.8) of Pathways Academy’s Policy and Procedure Manual.
34. IEP – Progress Reports (Criterion 8.8)

Pathways Academy provides parents and sending school districts with quarterly progress reports including written information on student progress toward IEP goals.

- Pathways Academy emails quarterly progress reports to parents/guardians/ school districts, and other agencies as applicable through a password protected system, eStar.
- A copy of the sent email is maintained with the individual progress report in the student’s file.
- Pathways Academy continues to offer paper copies of progress reports to any parents that request them. In such an instance, a cover letter is used. The cover letter is kept with each individual progress report in the student’s file.
35. Less Restrictive Placement (Criterion 8.10)

Pathways Academy ensures opportunities for enrolled students to gain capacity to return to a less restrictive program.

- At every team meeting, a discussion takes place regarding the student’s readiness to return to a less restrictive educational program.
- Transitioning back to public school successfully is a goal fully supported by Pathways Academy.
- Transitioning mechanisms may include, but are not limited to, a part-time program or a period of transition from one program option to a less restrictive program option.
- The student’s Team Leader would function as the liaison to the public school, and provide support for the student through the process.
- If a student’s IEP team deems it appropriate for that student to attend one or more courses at his or her sending high school, they may do so.
- Pathways Academy will work with the sending school district to ensure a smooth and successful transition and will maintain communication with high school staff as necessary.
- Preparation to do so might involve visits to the school with a Pathways Academy staff member and coordination of individual needs of students with sending school district, (e.g. one-on-one and/or scribe).
- Students are encouraged, with support from Pathways Academy staff, to contact local community colleges regarding Saturday programs and Special Education Supportive Services provided at the colleges.
- A student can receive part-time support in pragmatics, organization of assignments, time management, and comprehension of test requirements at Pathways Academy while taking a course of their choice at a nearby college and/or their local high school.
- Students at Pathways Academy may exercise their option to participate in any extracurricular activities in their home schools such as athletics, clubs, and social events.
- Students preparing to graduate upon completion of all requirements may take a Pathways Academy diploma, and/or one from their local public school.
- In addition, students have the option of participating in their public school's graduation ceremony.
36. IEP - Transition Planning (Criterion 8.11)

Pathways Academy ensures that each student age 14 years and older has a written transition plan. A student’s transition plan is developed and updated annually at his or her IEP team meeting. Pathways Academy has a designated staff member assigned to work with students on transition planning activities. Students are invited to, and encouraged to attend, part or all of Team meetings at which transition services are discussed or proposed. If appropriate, the IEP Team develops measurable goals based on transition needs related to training, postsecondary education, employment, and independent living skills.
37. Behavior Management Support (Criterion 9.1)

Pathways Academy utilizes consistent positive behavioral supports and natural consequences to manage student behavior. Every effort is made to encourage positive behavior by acknowledging and reinforcing cooperative interaction, developing consistent, clear rules in conjunction with the student; and designing classrooms/play spaces with student’s needs and behaviors in mind.

Pathways Academy’s policy and procedures are consistent with regulations under 603 CMR 46.00 regarding appropriate responses to student behavior that may require immediate intervention. The Behavior Management Support policy and procedures are reviewed annually and changes are made as needed to remain consistent with state regulations.

The Behavior Management Support policy and procedures are reviewed with staff annually and during new staff orientation.

Every September, Pathways Academy ensures that all parents/guardians are offered a copy of the Policies and Procedures manual to parents and guardians. Parents and guardians are also sent annual notice of the Behavior Management Support policy and procedures upon enrollment and annually thereafter.

1. Preventing Violence
   Pathways Academy’s methods for preventing student violence, include but are not limited to: supervision of students maintained at all times, all staff are trained in verbal de-escalation techniques and physical restraint in the Crisis Prevention Institute methods, all staff are provided walkie-talkies to increase communication among staff, the availability of possible harmful items are limited in the classrooms and students are taught to seek out assistance from staff when needed.

2. Preventing Self Harm
   Pathways Academy’s methods for preventing self-injurious behavior and suicide include but are not limited to: supervision of students maintained at all times, all staff are trained in verbal de-escalation techniques and physical restraint in the Crisis Prevention Institute methods, all staff are provided walkie-talkies to increase communication among staff, the availability of possible harmful items are limited in the classrooms and students are taught to seek out assistance from staff when needed.

3. Alternatives to Physical Restraint
   Pathways Academy employs many strategies as alternatives to restraint. These strategies include but are not limited to: allowing student to take a break whenever needed, allowing student to take space, reduction of demands, providing space for a student to blow off steam, providing access to sensory items/activities, providing access to calming or preferred activities, providing access to preferred staff, providing alternatives to school work and assignments if a student is not able to participate, and encouraging students to advocate for themselves. Students are encouraged to use their language and developing social skills to resolve conflicts instead of using harmful or physically aggressive behaviors. Students are taught to find appropriate avenues for meeting their needs and for defusing their anger.
The purpose of discipline at Pathways Academy is to provide a safe learning environment in which students can access the academic and pragmatics curricula. Physical restraint shall be used only in emergency situations of last resort, after other lawful and less intrusive alternatives have failed or been deemed inappropriate, and with extreme caution. School personnel shall use physical restraint with two goals in mind: (a) To administer a physical restraint only when needed to protect a student and/or a member of the school community from assault or imminent, serious, physical harm; and (b) To prevent or minimize any harm to the student as a result of the use of physical restraint.

4. **Training Requirements for Staff**
Pathways Academy staff members are trained upon hiring and annually thereafter in verbal de-escalation techniques and physical restraint in the Crisis Prevention Institute methods. In addition, all staff members are provided walkie-talkies to increase communication among staff, the availability of possible harmful items are limited in the classrooms and students are taught to seek out assistance from staff when needed. Behavioral Support procedures are discussed as needed during the daily morning staff meeting before students arrive, and in weekly team meetings where academic and clinical staff meet to discuss student needs. The Milieu Manager provides guidance on behavioral support in real time as well. The Milieu Manager provides annual training to all staff on how to complete Pathways Academy’s Internal Behavior Forms and what follow-up procedures are required.

5. **Reporting Requirements and Follow Up Procedures**
   **Informing the Principal 603 CMR 46.06 (2):** the program staff member who administered the restraint shall verbally inform the principal/educational administrator of the restraint as soon as possible, and by written report no later than the next school working day. The written report shall be provided to the principal for review of the use of the restraint. If the principal has administered the restraint, the principal shall prepare the report and submit it to an individual or team designated by the superintendent or board of trustees for review. The principal or director or his/her designee shall maintain an on-going record of all reported instances of physical restraint, which shall be made available for review by the parent or the Department upon request.

   **Informing Parents 603 CMR 46.06 (3):** the principal or director of the program or his/her designee shall make reasonable efforts to verbally inform the student’s parent of the restraint within 24 hours of the event, and shall notify the parent by written report sent either within three school working days of the restraint to an email address provided by the parent for communications about the student, or by regular mail postmarked no later than three school working days of the restraint. If the school or program customarily provides a parent of a student with report cards and other necessary school-related information in a language other than English, the written restraint report shall be provided to the parent in that language. The principal shall provide the student and the parent an opportunity to comment orally and in writing on the use of the restraint and on information in the written report.

   **Report all restraint-related injuries to the Department 603 CMR 46.06 (7):** when a physical restraint has resulted in an injury to a student or program staff member, the program shall send a copy of the written report required by 603 CMR 46.06(4) to the Department.
postmarked no later than three school working days of the administration of the restraint. The program shall also send the Department a copy of the record of physical restraints maintained by the principal pursuant to 603 CMR 46.06(2) for the 30-day period prior to the date of the reported restraint. The Department shall determine if additional action by the program is warranted and, if so, shall notify the program of any required actions within 30 calendar days of receipt of the required written report(s).

Report all restraints to the Department 603 CMR 46.06 (8): Report all physical restraints to the Department. Every program shall collect and annually report data to the Department regarding the use of physical restraints. Such data shall be reported in a manner and form directed by the Department.

6. Timelines for Receiving and Investigating Complaints
Once a member of Pathways Academy staff receives a complaint specific to the behavior management policy, he or she relays said complaint to the Administrative Team. The Administrative Team, including but not limited to the Director, Educational Administrator and the Milieu Manager, and/or their designee, will immediately begin an investigation. All such informal complaints will be responded to by either a meeting, telephone contact, or written correspondence that is designed to create the appropriate forum to resolve differences of opinion, clarify information, and intent, and are mutually agreed to have been resolved because of that communication. Pathways Academy is committed to resolving complaints an expedient manner. Investigation will begin immediately upon complaint. The complaint should be resolved within seven working days in most circumstances. Any informal complaint that is not satisfactorily resolved should be moved to the next step by the student, family or funding agency, through filing a formal complaint.

7. Procedures for Implementing Behavior Support Reporting Requirements
Informing the Principal 603 CMR 46.06 (2): the program staff member who administered the restraint shall verbally inform the principal/educational administrator of the restraint as soon as possible, and by written report no later than the next school working day. The written report shall be provided to the principal for review of the use of the restraint. If the principal has administered the restraint, the principal shall prepare the report and submit it to an individual or team designated by the superintendent or board of trustees for review. The principal or director or his/her designee shall maintain an on-going record of all reported instances of physical restraint, which shall be made available for review by the parent or the Department upon request.

Informing Parents 603 CMR 46.06 (3): the principal or director of the program or his/her designee shall make reasonable efforts to verbally inform the student's parent of the restraint within 24 hours of the event, and shall notify the parent by written report sent either within three school working days of the restraint to an email address provided by the parent for communications about the student, or by regular mail postmarked no later than three school working days of the restraint. If the school or program customarily provides a parent of a student with report cards and other necessary school-related information in a language other than English, the written restraint report shall be provided to the parent in that language. The
principal shall provide the student and the parent an opportunity to comment orally and in writing on the use of the restraint and on information in the written report.

Report all restraint-related injuries to the Department 603 CMR 46.06 (7): when a physical restraint has resulted in an injury to a student or program staff member, the program shall send a copy of the written report required by 603 CMR 46.06(4) to the Department postmarked no later than three school working days of the administration of the restraint. The program shall also send the Department a copy of the record of physical restraints maintained by the principal pursuant to 603 CMR 46.06(2) for the 30-day period prior to the date of the reported restraint. The Department shall determine if additional action by the program is warranted and, if so, shall notify the program of any required actions within 30 calendar days of receipt of the required written report(s).

Report all restraints to the Department 603 CMR 46.06 (8): Report all physical restraints to the Department. Every program shall collect and annually report data to the Department regarding the use of physical restraints. Such data shall be reported in a manner and form directed by the Department.

8. Oral and Written Notification - Informing Parents 603 CMR 46.06 (3): The principal or director of the program or his/her designee shall make reasonable efforts to verbally inform the student's parent of the restraint within 24 hours of the event, and shall notify the parent by written report sent either within three school working days of the restraint to an email address provided by the parent for communications about the student, or by regular mail postmarked no later than three school working days of the restraint. If the school or program customarily provides a parent of a student with report cards and other necessary school-related information in a language other than English, the written restraint report shall be provided to the parent in that language. The principal shall provide the student and the parent an opportunity to comment orally and in writing on the use of the restraint and on information in the written report.

9. Use of Time Out/Exclusionary Student Separation
Pathways Academy uses exclusionary student separation. If a student is experiencing difficulty, he or she is encouraged to take space. Pathways Academy has several Sensory Integration rooms available for students to use. Sensory Integration rooms. Students may also take space in other areas of the school such as the library, day room, or lounge. Staff members supervise students while they are taking a break or taking space. If a student is engaging in acting out behaviors, his or her peers are removed and go on with their activities elsewhere to provide space to the acting out student. A staff member supervises the student who is engaging in acting out behaviors and the Milieu Manager and/or psychologist are called. An administrator must provide approval for any use of time out/exclusionary separation that exceeds 30 minutes.

Pathways Academy does not withhold food as a form of punishment or behavior management for any reason other than those related to medical prescriptions. No meal shall be denied or unreasonably delayed for any reason other than medical prescription.
Nor does Pathways Academy use any form of corporal punishment, cruel or severe punishment, shaming, verbal abuse, or denial of food or other physical needs. Pathways Academy does not punish for soiling, wetting, or not using the toilet. Due to the specific needs of our student population, Pathways Academy does not employ level/point systems of privileges.

Pathways Academy provides behavior support training within a month of date of hire all staff members and annually thereafter.

**Acting Out Behaviors (AOBs)**
In the event a staff member observes the initial stages of “acting out behavior” (AOB) (including, but not limited to, non-compliance, name calling, yelling and/or throwing of an object):

- The staff member will immediately suggest that the student “take a break” and suggest an alternative activity.
- If the student is unable or unwilling to leave the area, the staff member will remove the other students in the area.
- If it is safe to do so, to avoid the use of physical restraint, the student will be allowed to de-escalate in the room in which the incident occurred.
- If it is deemed necessary for safety reasons, the student may be asked to go to a Sensory Integration (SI) room.
- The student will rejoin the community when calm.

A student at Pathways Academy may be denied access to on-campus services such as use of fitness center, McLean cafeteria, and music room, only if the he or she is deemed to be unsafe to self or others. These restrictions are re-evaluated once a student has demonstrated safe behavior. Then he or she is welcome to utilize the on-campus program services.

After an event involving a restraint, staff members meet to debrief and process with one another. Members of the clinical team will review the restraint and discuss alternatives to prevent the use of future restraints if possible.

**Behavior Reports**
- In the event of AOB staff will complete a behavior report, including but not limited to the antecedent, students’ behavior and staff’s intervention.
- This report will be reviewed by a member of the clinical team and presented to the entire staff at the staff meeting the following day.
- When it is deemed necessary by a member of the clinical team, a call will be made to the parents/guardian of them of the students involved to inform them of the incident.

**Suspension**
- A student may be suspended from Pathways Academy if they are deemed by Pathways Academy staff to be unsafe and/or disruptive to the education of others; this includes but is not limited to acting out behavior and/or the threats of acting out behavior.

**Termination**
• A student’s placement may be terminated when Pathways Academy can no longer ensure the safety of the student and others.
• Termination occurs only after alternative avenues have been explored and the student has proven to require a more intensive school setting than Pathways Academy can provide.
38. Student Separation Resulting From Behavior (Criterion 9.1(a))

In the event that a student is separated from his/her peers due to the occurrence of an “Acting Out Behavior” (AOB) the Milieu Manager or designee is deemed “in charge of the incident” and is responsible for making decisions regarding intervention. For separation lasting longer than 30 minutes, the Educational Administrator, or designee, must be notified and will determine an appropriate course of action.

If the student is unwilling or unable to relocate then his/her peers are removed. Staff will put “hands on” to restrain and escort a student to a Sensory Integration (SI) Room in accordance with the Crisis Prevention Institute’s (CPI) “Nonviolent Crisis Intervention” only when needed to protect a student and/or member of the school community from assault or imminent, serious, physical harm.

All direct care staff are trained in the CPI technique. SI rooms are not locked and are physically safe and appropriate for the students that Pathways Academy serves.

Students are continuously observed by a staff member and a staff member is with the student or immediately available to the student at all times. Staff directed time away from peers will cease as soon as the student’s AOB has ceased and the student has calmed.

Logs charting the student’s name, staff member’s name, time in, and time out are kept for students in an SI room. “Acting out” students are monitored at all times and in all parts of the school.

In the event of AOB, an incident report is used to log the amount of time the student was separated from peers, who approved the procedure, a description of the behavior and interventions used, and the name of the staff that monitored the student when separated from their peers. These reports are maintained in the student’s record.
39. Runaway Students (Criterion 9.3)

Pathways Academy defines a “runaway student” as a student whose whereabouts cannot be accounted for a time period exceeding 5 minutes. Documentation describing the particular circumstances of each runaway event, including notification of all appropriate parties, is maintained in student records.

The whereabouts of students will be known at all times by direct care staff. When a student cannot be located within five minutes, the student will be considered a “runaway” and the following procedure is followed:

- Staff will search the area and interview other students in the milieu for information which might help locate the student.
- When it is determined that the student is absent from the school or school property, the Milieu Manager, or designee will notify McLean Hospital Security of the missing person and supply security with identifying information useful for helping to recognize the student.
- McLean Security will notify the Belmont Police Department.
- As soon as possible when it is determined that a student is missing, the Director and Educational Administrator will be notified, and an announcement would be broadcast over the walkie-talkies that each staff person carries.
- The student’s parent/guardian will be contacted as soon as possible.
- An Incident Report (Form 2) will be completed describing the event and sent to the Department of Elementary and Secondary Education, the public school district, parents and a copy placed in the student’s chart; and
- The treatment team will discuss the incident and make decisions about the student’s appropriateness for the program, consequences upon return, and treatment plan adaptations which may be necessary to provide for the student’s safety.
40. Physical Restraint (Criterion 9.4)

Physical restraint is defined as direct physical contact that prevents or significantly restricts a student’s freedom of movement. Brief physical contact to promote student safety is not considered a restraint. Brief physical contact to promote student safety refers to measures taken by Pathways Academy staff members consisting of physical contact with a student for a short period solely to prevent an imminent harm to a student, for example, physically redirecting a student about to wander onto a busy road, grabbing a student who is about to fall, breaking up a fight between students.

Pathways Academy provides annual information to parents/guardians about the policy to perform a physical restraint for a student if they are in imminent danger of harming themselves or others. The Pathways Academy philosophy of reducing expectations and allowing students choices and the ability to take space whenever needed is integral in preventing restraints.

Pathways Academy maintains a low ratio (1 staff: 2 students) and requires staff members to remain hypervigilant to prevent student violence, dangerous behavior occurring with an individual or among groups, self injurious behavior, and suicide. Pathways Academy clinicians and milieu staff are available to staff and students at any time during the day for consultation and/or support. Pathways Academy staff members utilize Crisis Prevention Intervention (CPI) techniques to de-escalate potentially dangerous behavior.

In the event a staff member observes the initial stages of “acting out behavior” (including, but not limited to, non-compliance, name calling, yelling and/or the throwing of an object), staff members will immediately suggest that the student “take a break” and suggest an alternative activity. If the student is unable to leave the area, the staff member will remove the other students from the area. If it is safe to do so, in an effort to avoid the use of physical restraint, the student will be allowed to de-escalate in the room in which the incident occurred. If it is deemed necessary for safety reasons, the student may be asked to go to a Sensory Integration (SI) room.

1. **Methods for Engaging Parents/Students in Discussion on Restraint Prevention**
   Parents, guardians and students are invited to share concerns about restraints at any time and at the beginning of each school year via our Annual Information and Consent Packets provided to all parents. They may speak with Milieu Manager in person or at 617-855-2847.

2. **Description/Explanation of Restraint Procedures Used in Emergency Situations**
   Pathways Academy uses the Nonviolent Crisis Intervention method as outlined by the Crisis Prevention Institute (CPI). New staff members receive intensive instruction and certification and all staff members receive annual re-certification. This training includes prevention and de-escalation techniques, awareness of nonverbal communication, verbal intervention, acknowledgement of precipitating factors, rational detachment, integrated experience, the natural influence of fear and anxiety in response to a crisis. This method provides a framework for appropriate decision-making in a crisis. Staff are taught physical disengagement skills and holding skills in the seated and standing position including team control position and children’s control position. The Milieu Manager maintains CPI trainer certification and supervises the implementation of restraints, ensuring proper form and
3. Pathways Academy Prohibits Seclusion, Medication Restraint, Mechanical Restraints and Prone Restraints Unless Permitted Under 603 CMR 46.03 (1)(b). Pathways Academy does not utilize seclusion restraint, medication restraint, nor mechanical restraint; these forms of restraint are prohibited. Pathways Academy does not use physical restraint as a means of punishment or as a response to property destruction, disruption of school order, a student’s refusal to comply with a school rule or to staff directives, or verbal threats that do not constitute a threat of imminent, serious, physical harm.

Pathways Academy staff members administering the restraint have received in-depth training per the requirements of 603 CMR 46.03 (3). Pathways Academy prohibits the use of prone restraint except when the following criteria, set out in 603 CMR 46.03(1) (b), are met:

- The student has a documented history of repeatedly causing serious injury to self or others;
- All other forms of restraint have been unsuccessful in ensuring safety;
- There are no medical contraindications as documented by a licensed physician;
- There is psychological or behavioral justification with no psychological or behavioral contraindications as documented by a licensed mental health professional;
- Pathways Academy has obtained consent from the parent to use prone restraint in an emergency, and such use has been approved in writing by the Educational Administrator;
- The program has documented all the above in advance of the use of prone restraint.

McLean security personnel are considered “school security personnel” and as such nothing in 603 CMR 46.00 prohibits from them from exercising their responsibilities. McLean security personnel receive in-depth training.

4. Physical Restraint Used Only in Emergency Situations of Last Resort
Pathways Academy administers physical restraints only in emergency situations of last resort, after other lawful and less intrusive alternatives have failed or have been deemed inappropriate. Restraint is used only when needed to protect a student and/or member of the school community from assault or imminent, serious, physical harm and with extreme caution to prevent or minimize any harm to the student because of the use of the physical restraint.

5. Periodic Review of Data and Documentation of Program’s Use of Restraint
Pathways Academy conducts periodic review of individual and school-wide restraint data.

**Individual Student Review 603 CMR 46.06 (5):** The principal/educational administrator conducts a weekly review of restraint data to identify students who have been restrained multiple times during the week. If such students are identified, the principal shall convene one or more review teams as the principal deems appropriate to assess each student’s progress and needs. The assessment shall include at least the following:
(a) review and discussion of the written reports submitted in accordance with 603 CMR 46.06 and any comments provided by the student and parent about such reports and the use of the restraints;

(b) analysis of the circumstances leading up to each restraint, including factors such as time of day, day of the week, antecedent events, and individuals involved;

(c) consideration of factors that may have contributed to escalation of behaviors, consideration of alternatives to restraint, including de-escalation techniques and possible interventions, and such other strategies and decisions as appropriate, with the goal of reducing or eliminating the use of restraint in the future;

(d) agreement on a written plan of action by the program.

If the principal directly participated in the restraint, a duly qualified individual designated by the superintendent or board of trustees shall lead the review team's discussion. The principal shall ensure that a record of each individual student review is maintained and made available for review by the Department or the parent, upon request.

**Administrative Review 603 CMR 46.06 (6):** The principal/educational administrator conducts a monthly review of school-wide restraint data. This review shall consider patterns of use of restraints by similarities in the time of day, day of the week, or individuals involved; the number and duration of physical restraints school-wide and for individual students; the duration of restraints; and the number and type of injuries, if any, resulting from the use of restraint. The principal shall determine whether it is necessary or appropriate to modify the school's restraint prevention and management policy, conduct additional staff training on restraint reduction/prevention strategies, such as training on positive behavioral interventions and supports, or take such other action as necessary or appropriate to reduce or eliminate restraints.

6. **Training Requirements for All Staff**
Pathways Academy staff members are trained, immediately upon being hired and annually, in Non-Violent Crisis Intervention and Physical Restraint techniques from the Crisis Prevention Institute. Annually, at the start of the school year, or within a month of a new staff member starting, all Pathways Academy staff members are trained in verbal de-escalation techniques and physical restraints in the Crisis Prevention Institute methods. New staff members receive 8 hours of instruction and 3 hours annually thereafter. This training includes prevention and de-escalation techniques, awareness of nonverbal communication, verbal intervention, acknowledgement of precipitating factors, rational detachment, integrated experience, the natural influence of fear and anxiety in response to a crisis. This method provides a framework for appropriate decision-making in a crisis. Staff are taught physical disengagement skills and holding skills in the seated and standing position including team control position and children’s control position.

7. **Intensive Training for Staff Serving as Restraint Resources**
Pathways Academy’s Milieu Manager receives specialized training in Crisis Prevention and
Intervention techniques and serves as both a CPI trainer for Pathways Academy staff and as an ongoing resource for restraint and de-escalation issues. She/he is a certified CPI Instructor and maintains CPI Instructor credentials through annual training.

8. Reporting Requirement and Follow Up Procedures
Pathways Academy follows reporting requirements pursuant to 603 CMR 46.06.

Informing the Principal 603 CMR 46.06 (2): the program staff member who administered the restraint shall verbally inform the principal/educational administrator of the restraint as soon as possible, and by written report no later than the next school working day. The written report shall be provided to the principal for review of the use of the restraint. If the principal has administered the restraint, the principal shall prepare the report and submit it to an individual or team designated by the superintendent or board of trustees for review. The principal or director or his/her designee shall maintain an on-going record of all reported instances of physical restraint, which shall be made available for review by the parent or the Department upon request.

Informing Parents 603 CMR 46.06 (3): the principal or director of the program or his/her designee shall make reasonable efforts to verbally inform the student's parent of the restraint within 24 hours of the event, and shall notify the parent by written report sent either within three school working days of the restraint to an email address provided by the parent for communications about the student, or by regular mail postmarked no later than three school working days of the restraint. If the school or program customarily provides a parent of a student with report cards and other necessary school-related information in a language other than English, the written restraint report shall be provided to the parent in that language. The principal shall provide the student and the parent an opportunity to comment orally and in writing on the use of the restraint and on information in the written report.

Report all Restraint-Related Injuries to the Department 603 CMR 46.06 (7): when a physical restraint has resulted in an injury to a student or program staff member, the program shall send a copy of the written report required by 603 CMR 46.06(4) to the Department postmarked no later than three school working days of the administration of the restraint. The program shall also send the Department a copy of the record of physical restraints maintained by the principal pursuant to 603 CMR 46.06(2) for the 30-day period prior to the date of the reported restraint. The Department shall determine if additional action by the program is warranted and, if so, shall notify the program of any required actions within 30 calendar days of receipt of the required written report(s).

Report all Restraints to the Department 603 CMR 46.06 (8): Report all physical restraints to the Department. Every program shall collect and annually report data to the Department regarding the use of physical restraints. Such data shall be reported in a manner and form directed by the Department.

9. Procedure for Receiving and Investigating Complaints Regarding Restraints
During the application process to Pathways Academy parents/guardians of prospective students are made aware of Pathways Academy’s policy to use restraints only if the student
is deemed to be an imminent danger to themselves or others, and non-physical interventions are not effective. Annually parents/guardians of Pathways Academy students are notified that the Pathways Academy Policy Procedure Manual, including but not limited to the restraint policy, is available.

Parents/guardians are invited to meet with Pathways Academy staff to address the incident and subsequent restraints to prevent an incident to or reoccurrence and discuss any concerns or complaints regarding restraint practices.

Once a member of Pathways Academy staff receives a complaint and relays said complaint to the Administrative Team, the Administrative Team, including but not limited to the Director, Educational Administrator and the Milieu Manager, and/or their designee) will immediately begin an investigation.

The Director and Educational Administrator are available by phone if a parent or guardian has additional concerns or complaints. At this point the complaint will be documented as previously unresolved and an internal investigation will be initiated. After the internal investigation, has been completed, Pathways Academy administrators will meet with the concerned parent/guardian.

If parents or guardians have additional concerns or complaints or feel that their concerns have not been adequately resolved, they are required to put their concerns in writing and submit it to the Director of Child and Adolescents Services, who will investigate further to address the concern.

10. Ongoing Record of All Instances of Restraint

The Director, Milieu Manager, Educational Administrator, and Clinician will review the incident with the staff members who administered the restraint to determine if proper restraint procedure was followed. The restraint is documented on the master restraint log, reviewed by the Director, or designee, and available for review by the DESE.

Staff members involved in the restraint are required to write a behavior report that includes the name and titles of staff members administering the restraint, staff members observing the restraint, the date and time of the restraint beginning and end, the name of administrator who was verbally informed after the restraint, a description of the activity the student was engaged in immediately preceding the use of restraint, the efforts made to de-escalate the situation, alternatives to restraint that were attempted, a justification for the physical restraint, a description of the actual restraint, the student’s reactions during the restraint, how the restraint ended, documentation of injuries to the student during the restraint, any medical care provided, alternatives to extended restraint that were tried, and information regarding further action that the school may or will take, including suspension.
41. 3-5 Day Suspension (Criterion 9.5)

In the event of a suspension, Pathways Academy will immediately notify the parents and the school or human service agency responsible for the student’s placement.

- Within 24 hours of the suspension, Pathways Academy will provide a written statement explaining the reasons for suspension to the parents, school district, and/or human service agency involved with the student.
- Pathways Academy will not send home a student unless a responsible adult is available to receive the student.
- Pathways Academy considers a suspension to begin when a student is sent home early.
- At Pathways Academy, in-school suspension is not considered to be a ‘suspension’ because the student is supervised by a licensed teacher or taught by a paraprofessional that is supervised by a licensed teacher.
- If the student received an in-school suspension and was not supervised by a licensed teacher or supervised paraprofessional, then indeed it would be considered a suspension.
- Consistent with federal requirements, once a student has been suspended for three (3) consecutive school days or five (5) non-consecutive school days in a year, Pathways Academy, parents, and the school district will work together to explore all possible program modifications within the school in an attempt to prevent more lengthy suspensions of the student from the program.

Pathways Academy maintains a suspension log to record and track the number and duration of suspensions, as well as notification of all appropriate parties, including suspensions from any part of the student’s IEP program (including transportation).

- This documentation is maintained in student records.
- Documentation of notification sent to parents, schools districts and others are maintained in the student record.
42. 10+ Day Suspension (Criterion 9.6)

Prior to a “change in placement” (a suspension that exceeds 10 consecutive school days or is one in a series of suspensions that constitute a pattern under 34 CFR 300.536):

- A request is made to the sending school district to convene the students IEP Team.

- Pathways Academy participates in the team meeting to help to
  - Develop a Functional Behavioral Assessment (FBA) of the student’s behavior
  - Develop or modify a behavior intervention plan
  - Identify appropriate alternative educational setting(s), and
  - Conduct a manifestation determination (i.e. to determine the relationship between the disability and the behavior).

- If the team determines that the behavior is not a manifestation of the disability, Pathways Academy may suspend or terminate the student consistent with policies applied to any other student in the program. The responsible school district must offer an appropriate educational program in another setting.

- If the team determines that the behavior is a manifestation of the student’s disability, the team will take steps to modify the IEP, the behavior intervention plan, and/or the placement.

- The number and duration of student suspensions that constitute a change in placement are logged by the Milieu Manager and Educational Administrator and are kept in the Educational Administrator’s office and within the student’s binder.

- Pathways Academy notifies parents/guardians, sending school districts, DESE, and any other involved agencies when a student suspension constitutes a change of placement. This notification includes a request to convene a team meeting as described above.
43. Terminations (Criterion 9.7)

Planned Terminations
Pathways Academy will notify the school district of the need for an IEP review meeting and provides notice of this meeting to all appropriate parties ten (10) days in advance of the intended date of the meeting. The purpose of the meeting will be to develop a clear and specific termination plan for the student that shall be implemented in no less than thirty (30) days unless all parties agree to an earlier termination date.

Emergency Terminations
In circumstances where the student presents a clear and present threat to the health and safety of him/herself or others, Pathways Academy will follow the procedures required under 603 CMR 28.09(12)(b) and immediately notify the DESE.

- Pathways Academy will not terminate the enrollment of any student, even in emergency circumstances, until the enrolling school district is informed and assumes responsibility for the student.

- At the request of the school district, Pathways Academy will delay termination of the student up to two (2) calendar weeks to allow the school district the opportunity to convene an emergency team meeting or to conduct other appropriate planning discussions prior to the student’s termination from the program.

- With mutual agreement between Pathways Academy and the school district, termination of enrollment may be delayed for longer than two calendar weeks.
44. Staffing for Instructional Groupings (Criterion 10.1)

Pathways Academy has instructional groupings that do not exceed the approved ESE Student: Licensed Educator Ratio of 4:1.

- The “Student: Licensed Educator Ratio” is defined as number of students within an instructional group to the number of licensed teachers or licensed related service providers.

Pathways Academy has instructional groupings that do not exceed the approved ESE Student: Licensed Educator: School Counselor (Aide) Ratio of 4:1:1.

- A “Student: Licensed Educator: Aide Ratio” is defined as the number of students within an instructional group to the number of licensed teachers or licensed related service providers to the number of aides.
45. Age Range (Criterion 10.2)

Pathways Academy ensures that the ages of the youngest and oldest student in any instructional grouping will not differ by more than forty-eight months (4 years).

When and if it becomes necessary to exceed the forty-eight month timeframe, an Alternate Compliance Waiver (http://www.doe.mass.edu/pqa/sa_nr) will be requested for approval by the DESE.
Hiring Process
Pathways Academy’s hiring process is conducted under the auspices of the McLean Hospital Human Resources Department. McLean Hospital conducts Criminal Offender Record Information (CORI) checks on all employees and volunteers prior to employment and every three years thereafter.

Fingerprinting
All Pathways employees are fingerprinted at the start of employment. Fingerprinting Records are managed by McLean Hospital Human Resources.

Annual Performance Evaluation
In accordance with McLean Hospital Human Resources Department, at Pathways Academy it is expected that the process of performance appraisal be an ongoing dialogue that occurs informally on a day-to-day basis. The written performance appraisal is only one step in this process and it is required that every employee receives this written appraisal of his/her work performance on an annual basis. The evaluation will be based on the employee's work performance and on expectations/standards communicated to the employee by management and consists of three parts, a written evaluation using a hospital approved form, a personal discussion of the evaluation between the evaluator and the employee, and a follow-up in the form of employee counseling and ongoing review of established goals and action plans, as appropriate.

Discipline
If an employee’s conduct interferes with the orderly and efficient operation of the hospital, either through poor performance, poor attendance, misconduct, safety violation or failure to adhere to established hospital rules, policies, or procedures, disciplinary action will be taken to correct that behavior.

An investigatory suspension may be utilized during the investigation of a discipline issue. Such a suspension is a non-punitive, imposed absence from work for an unspecified period of time, pending investigation of suspected or alleged seriously inappropriate behavior, attendance, or job performance. An investigatory suspension requires prior review by the Human Resources Department unless an investigatory suspension is necessary after business hours or on weekends. In these cases Human Resources needs to be contacted on the next business day. An investigatory suspension, although for an unspecified period of time, should be as short as possible (generally no more than two days) and ultimately converted to no loss of pay, disciplinary suspension, or termination.

In conjunction with McLean Hospital, Pathways Academy uses a progressive corrective action approach. This progressive approach may be modified based on the facts and circumstances of each case. Some misconduct may be so serious as to cause immediate discharge.

- The first step is documented verbal counseling in which the supervisor identifies misconduct, performance deficiency, or attendance problems, specifies the appropriate expectations, and ensures that the employee is aware of both the impact of the misconduct, performance deficiency, or poor attendance on department and hospital operations and what must be done to avoid further disciplinary action.
• The second step is a written warning in which the employee is notified in a more significant way, of the cause for concern regarding attendance, performance, or inappropriate behavior and to indicate that further corrective action could take place if there is no improvement.

• The third step is a final written warning or disciplinary suspension (the choice of action taken depends on circumstances presented).
  o The purpose of the final written warning is to notify the employee in a significant way of cause for grave concern regarding attendance, job performance, or inappropriate behavior and to indicate that further corrective action could take place if there is no improvement.
  o Disciplinary suspension without pay is a very serious form of corrective action. It should be used only when the supervisor believes that, by its use, the employee will correct the conduct.
  o A disciplinary suspension should be for a stated period of time but only of duration sufficient to demonstrate extreme concern for the employee’s behavior, not to exceed five days unpaid.
  o The employee should be given a brief written statement of the reasons for and the duration of the disciplinary suspension and a copy should be sent to Human Resources for the employee’s personnel file.

• The fourth step is termination which is used when it is concluded that attempts to correct the employee’s behavior have failed or when the improper conduct is of such a serious nature that the employment relationship should not be continued.

Complaints
Pathways Academy makes available to staff a set of written procedures that may be used to register complaints regarding the student’s education and care at the school that includes specific timelines and the appeals process.

• Pathways Academy makes available to parents, and when applicable students, the grievance procedures for staff providing for prompt and equitable resolution of complaints alleging discrimination based on legally protected categories (race, color, national origin, gender, religion, sexual orientation, disability) that includes specific timelines and the appeals process.

• Pathways Academy is committed to the process of resolving all complaints and grievances raised by staff. Pathways Academy takes all complaints and grievances seriously, and strives for a prompt and equitable resolution of complaints and grievances.

The following process outlines the procedures for resolving complaints brought to the attention of Pathways Academy by staff.

An informal complaint is defined as any question or concern regarding the staff members’ workplace environment that is raised to a supervisor, Educational Administrator, and/or Director or designee.
• Any and all such informal complaints will be responded to by either a meeting, telephone contact, or written correspondence that is designed to create the appropriate forum to resolve differences of opinion, clarify information, and intent, and are mutually agreed to have been resolved as a result of that communication.

• Any informal complaint that is not satisfactorily resolved should be moved to the next step by filing a formal complaint.

A formal complaint represents a very serious question or concern regarding the staff member’s workplace environment.

• The formal complaint notification form is utilized in this instance to officially document the complaint and to trigger the internal resolution procedure.

• The formal complaint should be put into writing and directed to Pathways Academy’s Educational Administrator and/or Director.

• Upon receipt of the formal complaint, Pathways Academy’s Educational Administrator or Director will contact all parties and schedule a meeting date within seven (7) working days of the receipt of the notification.

• At the meeting, the complaint is explored, and a resolution is determined along with an action plan to provide guidelines and ensure compliance.

• This resolution is documented on the complaint resolution and action plan form and copies are made available to the person(s) filing the complaint, as well as maintained in the complainant’s personnel file.

• If no resolution is reached in the meeting, an additional meeting will be scheduled with the participation of the Director of Human Resources at McLean Hospital within 30 days of the original filing of the complaint/grievance.

• The same procedures outlined above will take place in the second meeting.

• Pathways Academy and the McLean Hospital Human Resource department maintain written records of all decisions regarding complaints and grievances.

Volunteers
Potential volunteers complete an application form and are interviewed by the Educational Administrator or designee. Volunteers must be at least 18 years of age. Volunteers, like all hospital employees and trainees, must complete a CORI (Criminal Offender Record Information) form prior to acceptance. They must also attend orientation for new employees. Attempts are made to match an applicant’s qualifications and interests with the needs of areas to be served.

Equal Employment
Pathways Academy, in accordance with Partners Health Care System Inc. (PHS), provides an equal opportunity in employment and all terms, conditions and privileges of employment to all employees and applicants for employment. No person is to be discriminated against because of race, color, sex, gender identity, religion, national origin, sexual orientation, disability, or homelessness.
47. Administrative Responsibility (Criterion 11.2)

Pathways Academy’s Director has administrative responsibility over the operation of the school. In the event that the Director is not on the premises, the Educational Administrator will have responsibility over the operation of the School. In the rare event that neither the Director nor the Educational Administrator is on the premises the Milieu Manager assumes administrative responsibility over the operation of the School. All staff on duty know who is responsible for the administration of the school at any given time.
48. Educational Administrator Qualifications (Criterion 11.3)

Pathways Academy’s Educational Administrator supervises the provision of special education services and ensures that the services specified in each student’s IEP are delivered. An Educational Administrator at Pathways Academy is required to be a licensed special education administrator and/or possess a license in special education, a minimum of a master’s degree in special education or a related field, and a minimum of one year of administrative experience.

On an annual basis, the Educator Administrator submits his/her professional development plan to the Director of the program for approval. The Educational Administrator is re-licensed pursuant to the requirements of 603 CMR 44.00.
49. Teachers (Criterion 11.4)

All teachers at Pathways Academy are licensed appropriately to meet the needs of our students pursuant to 603 CMR 7.00. The number of special education teachers and the number of general education teachers corresponds with the most recently approved ESE Staffing Plan.

- Pathways Academy teachers are re-licensed pursuant to Massachusetts state regulations and must obtain supervisory approval of their professional development plan pursuant to Massachusetts state regulations.
- In the event that general education teaching staff is providing special education services, such services will be provided, designed or supervised by a special education teacher.
- A student’s teacher who has knowledge about the education and learning progress of the student will be in attendance at that student’s IEP Team meeting.
50. Related Services Staff (Criterion 11.5)

All staff and consultants that provide, or supervise the provision of, related services at Pathways Academy are appropriately licensed and registered in their professional areas.
51. Master Staff Roster (Criterion 11.6)

Pathways Academy maintains a current master staff roster including job titles, UFR title numbers, and Full Time Equivalents (FTE) for all positions. The staff positions correspond the last ESE approved Program Budget.
52. Job Descriptions (Criterion 11.7)

Pathways Academy has written job descriptions for all staff positions that shall be made available to staff as well as parents, upon request. The job descriptions include the actual titles and UFR title numbers, and the person to whom the individual reports.
53. Salary Ranges (Criterion 11.8 [2001-02])

McLean Hospital maintains salary ranges and benefits for all positions.
54. Organizational Structure (Criterion 11.9)

Pathways Academy maintains a current organizational structure chart that illustrates and describes the lines of supervision for staff and students. The structure outlined below provides for the effective and efficient operation of Pathways Academy.

McLean Hospital’s Child and Adolescent Psychiatry Division (CAP) Clinical Director supervises the Pathways Academy Consulting Psychiatrist and the Administrative Director of Child and Adolescent Programs at McLean Hospital. The Administrative Director of McLean Hospital’s Child and Adolescent Programs supervises the Administrative Manager of McLean Hospital’s Child and Adolescent Programs and the Director of Pathways Academy. The Director of Pathways Academy supervises the Secretarial Staff, the Educational Administrator, the Milieu Manager, the Clinicians, the Occupational Therapists, the Speech and Language Therapists, and the School Nurses. The Educational Administrator supervises the Team Leaders, the Admissions Counselor, the Special Education Teachers, General Education Teachers and School Counselors.

I. Clinical Director, McLean Hospital, Child and Adolescent Psychiatry Division
   a. Psychiatrist
   b. Administrative Director, McLean Hospital, Child and Adolescent Programs
      i. Administrative Manager
      ii. Director, Pathways Academy, UFR # 102, 1.0 FTE
          1. Secretarial Staff, UFR # 137, 1.0 FTE
          2. Educational Administrator, UFR # 101, 1.0 FTE
             a. Special Education Teachers – Team Leader, UFR # 115, 2.0 FTE
                i. Special Education Teachers, UFR # 115, 7.0 FTE
                ii. General Education Teachers, UFR # 116, 1.0 FTE
                iii. School Counselors, UFR # 130, 9.0 FTE
          3. Milieu manager, UFR # 101, 1.0 FTE
          4. Clinicians, UFR # 123, 2.0 FTE
          5. Occupational Therapist, UFR # 111, 1.5 FTE
          6. Speech and Language Therapist, UFR # 113, 2.0 FTE
          7. School Nurse, UFR # 108, 1.0 FTE
          8. Admissions Counselor, UFR # 101, 1.0 FTE
55. Supervision of Direct Care Day and Residential Staff (Criterion 11.10)

Pathways Academy provides ongoing and regular supervision of all direct care workers by Team Leader and Educational Administrator with input from the Milieu Manager.

Pathways Academy holds weekly regularly scheduled meetings between direct care workers and supervisors; and between teachers, direct care workers and other educational and clinical personnel.
56. Supervision of Students (Criterion 11.11)

Pathways Academy provides appropriate supervision while students are engaged in any school related activity on and off school grounds. Student: Licensed Educator Ratio of 4:1 and Student: Licensed Educator: School Counselor (Aide) Ratio of 6:1:2.
57. Equal Access (Criterion 11.12)

Federal Non-Discrimination and Equal Opportunities Laws and Regulations
McLean Hospital and its affiliates, the Arlington School and Pathways Academy (collectively, McLean), do not discriminate on the basis of race, color, religion, national origin, age, sex, gender, sexual orientation, or disability in admission or access to, treatment or employment at, or any other aspect of the educational programs and activities that McLean operates. McLean is required by Title VI of the Civil Rights Act of 1964 (Title VI), Section 504 of the Rehabilitation Act of 1973 (Section 504), Title IX of the Education Amendments of 1972 (Title IX), the Age Discrimination Act of 1975 (Age Act), and their respective implementing regulations at 34 C.F.R. Parts 100, 104, 106 and 110, not to discriminate on the basis of race, color, national origin, disability, sex, or age in the educational programs and activities that McLean operates. Inquiries concerning the application of each of the aforementioned statutes and their implementing regulations to McLean may be referred to the U.S. Department of Education, Office for Civil Rights, at (617) 289-0111 or 5 Post Office Square, 8th Floor, Boston, MA 02109-3921, or to the applicable McLean coordinator:

- Arlington School: Ethan Solomon, 617-855-2124, McLean (Arlington School), 115 Mill Street, Belmont, MA 02478
- Pathways Academy: Roya Ostovar, Ph.D., (or designee in event of absence, Karen Steves, Milieu Manager), 617-855-2847, McLean (East House), 115 Mill Street, Belmont, MA 02478.

Title VI of the Civil Rights Act of 1964
This title declares it to be the policy of the United States that discrimination on the ground of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy.

The Equal Educational Opportunities Act prohibits specific discriminatory conduct, including segregating students on the basis of race, color or national origin, and discrimination against faculty and staff. Furthermore, the EEOA requires school districts to take action to overcome students’ language barriers that impede equal participation in educational programs.

Title IX of the Education Amendments of 1972
prohibits discrimination on the basis of sex in education programs and activities by recipients of federal funds. Title IX has been applied to ensure equal opportunities for female students in athletics and in cases of sexual harassment by school administrators, teachers and students.
58. New Staff Orientation and Training (Criterion 12.1)

Upon hiring, all staff members are given a Pathways Academy Policy and Procedures Manual. New staff members will meet with the Director, Educational Administrator, or designee, to review the Policies and Procedures Manual.

The Educational Administrator is responsible for coordination and implementation of orientation training. New staff members are also assigned a team leader who will provide daily guidance and support. Each new staff member receives extensive training from McLean Hospital and Pathways Academy to ensure an understanding of the school’s philosophy, organization, program, practices, and goals.

The training includes, but is not limited to:
- Program’s philosophy, organization, practices, and goals
- Student sensory integration breaks
- Suspensions
- Terminations
- Reporting of abuse and neglect of students to the Department of Children and Families and/or the Disabled Persons Protection Commission (a)
- Disciplinary and behavior management procedures used by the Pathways Academy including the use of positive behavioral supports and natural consequences and why Pathways Academy does not use point systems (b)
- Use of restraints/CPI restraint procedures including de-escalation methods used by Pathways Academy (c)
- Procedures for runaway students (d)
- Emergency procedures including evacuation drills and emergency drills (e)
- Civil rights responsibilities (discrimination and harassment) (f)
- Bullying Prevention and Intervention - MARC Anti-Bullying (g)

New staff members may not be assigned direct care duties with students until they have participated in all mandated trainings listed under criterion 12.2 a-f through their orientation program. Orientation of interns, volunteers, or others who work at the program is the same as for newly hired staff. Newly-hired staff members are provided training materials on all Department-required topics at the time of hire if the required topics have already been covered with existing staff.

Newly hired staff members are provided training on all Department-required topics at the time of hire if the required topics have already been covered with existing staff.
59. In-Service Training Plan and Calendar (Criterion 12.2)

Prior to the start of each school year, Pathways Academy’s Educational Administrator and Milieu Manager work together to develop an in-service and training calendar.

- Pathways Academy provides a minimum of two hours monthly of annual in-service training and a full day of training prior to the first day of school in September.
- The In-Service Training Plan and Calendar include all required training topics, the name and job title of the person conducting the individual training sessions, the intended audiences, the length of time allotted for each training, and the dates and times when the various training topics will be offered.
- Staff may attend outside training opportunities including McLean Grand Rounds and other lectures and opportunities on McLean Campus.
- Individual staff attendance at Pathways Academy in-services is recorded on sign-in sheets, located in the Meetings Binder in the Milieu Manager’s Office. In addition, each employee maintains a roster of in-services attended in their personnel file.

McLean Hospital requires an annual mandatory in-service on compliance, fire safety, HIPPA, and infection control. These trainings are conducted upon hiring and then annually in an online format.

The In-Service and Training Calendar for all staff contains but is not limited to:

a. Reporting abuse and neglect of students to the Department of Children and Families and/or the Disabled Persons Protection Commission. (Criterion 3.1(c))

b. Disciplinary and behavior management procedures used by Pathways Academy such as positive reinforcement and positive behavioral supports. (Criterion 9.1)

   i. Why Pathways Academy does not use point systems.
   ii. Providing students with space when having a difficult time- the Pathways Academy version of a non-punitive time out procedure.
   iii. De-escalation Methods and Restraint (CPI) (Criterion 9.4), suspensions (Criterion 9.5), (Criterion 9.6), terminations (Criterion 9.7).

c. Program’s Use of physical restraint (Criterion 9.4)

d. Runaway policy and procedures. (Criterion 9.3)

e. Emergency procedures, including but not limited to: evacuation, drills, emergency drills, utilization of the alarm system and instances of evacuations in instances of fire or natural disaster. (Criterion 3.1(d))

f. Civil Rights responsibilities (discrimination and harassment) regarding race, color, sex, gender identity, religion, national origin, sexual orientation, disability, and homelessness. (Criterion 11.12)
g. Bullying Prevention and Intervention

h. Medication administration (Criterion 16.5) [appropriate staff only]

i. Medication Training (Criterion 12.2(d))

j. Current Student Medications: Pathway Academy's Nurse(s), Consulting Physician, and/or Consulting Psychiatrist annually train staff members on the nature of medication, potential side effects, and any special precautions or requirements regarding medication. This training does not allow staff to administer medication.

k. Transportation safety (Criterion 17.1)

l. Student records and confidentiality issues. (Criterion 18.1)

m. Massachusetts Curriculum Frameworks and Common Core Learning Standards/Entry Points and how they are incorporated into instruction. (Criterion 7.1)

n. Procedures for the inclusion of all students in MCAS testing and/or MCAS ALT portfolio assessments. (Criterion 7.3)

**CPR Training and Certification**

Pathways Academy's Milieu Manager receives training in CPR from the American Heart Association and serves as a CPR trainer for all Pathways Academy staff. Pathways Academy staff members receive training and certification annually. (Criterion 12.2(c))
60. Required Training - Behavior Management and Restraint Training (Criterion 12.2 (a))

Policy and procedure regarding Required Training - Behavior Management and Restraint Training is outlined in Behavior Support/ Management (Criterion 9.1) and Physical Restraint (Criterion 9.4) of Pathways Academy’s Policy and Procedure Manual.
61. Child Abuse Reporting (Criterion 12.2 (b) [2001-02])

Policy and procedure regarding Child Abuse Reporting is outlined in Reporting Suspected Child Abuse / Neglect to Department of Children and Families and to the Disabled Persons Protection Commission (Criterion 3.1(c)) of Pathways Academy’s Policy and Procedure Manual.
62. Required Training – CPR Certification (Criterion 12.2 (c))

Pathways Academy’s Milieu Manager receives training in CPR from the American Heart Association and serves as a CPR trainer for all Pathways Academy staff. Pathways Academy staff members receive training and certification annually.
63. Required Training – Medication Training (Criterion 12.2 (d) [2013-14])

Pathways Academy’s Nurse serves as the medication trainer for all Pathways Academy staff. Pathways Academy staff members receive training on the nature of the medication, potential side effects and any special precautions or requirement annually.
64. Required Training – Emergency Procedures (Criterion 12.2 (f) [2013-14])

Pathways Academy staff members receive training on Emergency Procedures annually.

- **Evacuation Drills** - conducted at least two times per year to ensure that all staff and students are able to leave the building safely.
- **Emergency Drills** - conducted at least 4 times per year under varied conditions, to assure that all personnel are trained to perform assigned tasks and that all personnel are familiar with emergency procedures including but not limited to the use of firefighting equipment in the building.
- Staff are trained yearly by McLean Hospital on appropriate use of fire extinguishers.
- A detailed map of Pathways Academy’s building layout is located in every room to denote the locations of extinguishers and alarm boxes.
- The implementation of the emergency protocol will be evaluated periodically to determine the effectiveness of the protocol and procedures and if changes are necessary.
65. Educational Facilities and Materials (Criterion 13.1 [2001-02])

Policy and procedure regarding Educational Facilities and Materials is outlined in Description of Physical Facility (Criterion 13.2) of Pathways Academy’s Policy and Procedure Manual.
66. Description of Physical Facility (Criterion 13.2)

Kitchen, Dining, Bathing/Toilet and Living Areas
Pathways Academy ensures that all kitchen, dining, bathing/toilet, and living areas are of adequate type, size, and design appropriate to the ages and needs of the students.

- Pathways Academy’s lounges and dayroom are designed to simulate the functional arrangement of a home to create an environment in which to teach and encourage students to use pragmatically appropriate behavior.
- Pathways Academy staff members ensure that the school is clean, well ventilated, free from hazards, and provides students with equipment, supplies and materials that are clean, safe, safely stored, well maintained, and appropriate to the ages and needs of the students.
- All steam and hot water pipes are protected by permanent screen guards, insulations, or other suitable devices which prevent students from coming into contact with them.
- Pathways Academy, in conjunction with McLean Hospital, maintains room temperatures at not less than 68°F when it is 0°F outside and not more than the outside temperature when the outside temperature is above 80°F.

Classroom Space and Other Facilities Used by Students
Classrooms at Pathways Academy accommodate a maximum of four students and meet needs relating to the age, size, specific educational requirements, and physical capabilities of the students. Pathways Academy provides the facilities, textbooks, equipment, technology, materials, and supplies needed to provide special education and related services specified on the IEPs of students. Pathways Academy, in conjunction with the McLean Hospital facilities department and UNICO, ensure that all areas, including but not limited to floors, ceilings, and walls are clean, well maintained, and are free from hazards.

Description of Physical Space
Students, families, visitors, and staff arrive at the main entrance into the waiting area (101B). After entering through the waiting area into the main part of the school families and visitors are greeted by the school secretary/office manager in the main office, N104. Off the main office is 104A, a teacher’s area. The staff bathroom, T104B, adjoins N104. The indoor space is U-shaped. The internal facility includes 6 bathrooms (T166C, T166D, T104B, T110, T114 and T116. T166C is handicapped accessible). There is an adjoining back porch, an outdoor back play yard with a basketball court. 156 is the locked nurse’s room, with internal locked medicine cabinets.

The right wing rooms: 151, the Director’s office; 153, the Educational Administrator’s office; 158, Speech Therapist office; 162, Admissions office; 155A, sensory integration (SI) Room; 155, day room (common area for all students); 155A, library/small class area; 159, occupational therapy/sensory integration gym; 161, classroom; 166B, sports equipment storage; 163, classroom; 167, classroom and 167A, SI room.

The left wing rooms: D106, a multi-windowed, large dining area-students take buffet style lunch here; 108, Life Skills Room; 107, Milieu Manager’s office; 109, Clinical office; 111B, Social Workers office; 111A, classroom; 113, classroom; 115, classroom; 117, lounge; 121, classroom; 122, classroom 123, Speech and Language Therapist office; and 120, SI room.

PATHWAYS ACADEMY POLICIES AND PROCEDURES MANUAL
Last revised on 11/19/18
67. Physical Facilities / Architectural Barriers (Criterion 13.3 [2001-02] / 13.4)

Pathways Academy ensures that students with limited mobility have access, free from barriers to their mobility, to those areas of the school buildings and grounds to which such access is necessary for the implementation of their IEPs. All programs receiving federal funds must meet the requirements of Section 504 of the Rehabilitation Act of 1973.

All buildings on McLean Hospital campus that are utilized in carrying out the IEP services for students has at least one entrance without steps which is wide enough for a wheelchair.

In the event that an access to a building does not meet the specific physical needs of all enrolled students, Pathways Academy staff members will work with McLean Hospital’s facilities department immediately to develop a plan and timetable to ensure access is made possible.
68. Classroom Space (Criterion 13.5 [2001-02])

Policy and procedure regarding Classroom Space is outlined in Description of Physical Facility (Criterion 13.2) of Pathways Academy’s Policy and Procedure Manual.
69. Library / Resource Room (Criterion 13.6 [2001-02]) /13.7)

Pathways Academy students have the opportunity to go on outings to the Belmont Public Library or the Watertown Public Library.

- Pathways Academy requires parental permission for students to take out games rated higher than E and movies rated higher than PG.
- A parent’s signature may be necessary to acquire a library card.
- Pathways Academy’s students and families are responsible for items brought home from school, including but not limited to: returning them to the library, bringing them back to school in a timely manner, and paying any and all incurred fines.
- Pathways Academy reserves the right to prohibit students from taking out any materials deemed by staff as inappropriate.
- Pathways Academy has a separate library/resources room that contains a variety of material appropriate to the age and abilities of the students enrolled.
- The library is located off a common area and is available for use by all students.
- In addition each classroom maintains its own collections of pleasure and required reading material when doing so does not detract from student learning.
- Research using encyclopedias, dictionaries, atlas work, etc. is done online with a teacher present at all times.
70. Outdoor Space (Criterion 13.8 / 13.9 [2013-14])

Pathways Academy maintains an outdoor area of at least seventy-five square feet per student using it at any one time. The outdoor area is accessible to direct sunlight and free from hazards and/or harsh or abrasive materials.
71. Food and Nutrition (Criterion 14.2)

Upon acceptance of a student, Pathways Academy requests the sending school district to report if the student's eligible for free or reduced meals. Sending school districts are responsible to update Pathways Academy if and when a students’ eligibility status changes.

- Pathways Academy provides all students a selection of nutritional lunch entrees and sides, snacks, and drinks from which students may choose. Among the choices are foods that address our students’ individual dietary requirements. Parents may choose to send in food.
- Pathways will provide for the use of a refrigerator and microwave for the purpose of storing and reheating breakfast and lunch items.
- Pathways Academy has a full Life Skills room used for the purposes including, but not limited to, Life Skills, Transition Planning and Occupational Therapy.
- In the event a student is eligible for free or reduced breakfast, an arrangement will be made between Pathways Academy and McLean Hospital Dietary Department to prepare and deliver said breakfast.
- An ample amount of food for each individual including several entrée choices is provided by McLean Hospital Dietary department.
- The McLean Hospital Dietary department is responsible for the purchase, storing, and delivery of breakfast and lunch food. To best meet the needs of our students, the same array of lunch choices are available on a daily basis and is delivered by 11:15 AM each day in sealed containers and offered buffet style.
- Staff members assist students in acquiring the appropriate amount and variety of food. Students have access to snacks and drinks throughout the day. Students are supervised by staff during their lunch period.
- Food will not be withheld from any student for any reason. The staff encourages students to eat a well balanced diet, but no student is force-fed or otherwise coerced to eat against their will.
- The students will be allowed to eat at a reasonable, leisurely rate where they feel most comfortable. In the event that parents would like the consumption of food to be limited, they must provide written documentation with guidelines from a physician and/or a nutritionist. Pathways Academy will support the plan as long as it does not lead to aggression or interfere with a student’s ability to participate in the learning process.
- Pathways Academy’s Milieu manager or designee is responsible for the oversight of communication addressing lunch and breakfast. She is also responsible for ordering and storing snack items.
- Students should not bring in food from home to share with peer (including, but not limited to, homemade and store bought).
72. Toileting Procedures and Individual Plans (Criterion 14.3)

Pathways Academy does not provide toilet training and does not admit students who are unable to toilet themselves. In the event of an accident, two staff members (including School Nursing or designated staff member) will assist the student as needed with disposable gloves and disposable wipes in a private and respectful manner. If necessary, staff members will assist in a clothing change and soiled clothing will be sent home.

Bathroom(s) are handicapped accessible, private, and available throughout the day. Bathrooms are cleaned daily and on an as needed basis by McLean Hospital staff.
73. Parental Involvement and Parents’ Advisory Group (Criterion 15.1)

Pathways Academy employs a Family Liaison to provide parent and/or guardians outreach and seek input. The Family Liaison is available by phone during school hours. Parents and guardians are welcome to schedule a meeting with Pathways Academy staff members at any time. Pathways Academy academic teams send home monthly newsletters to provide families with information about upcoming and ongoing educational activities.

- Pathways Academy has a Parent Advisory Group (PAG) that meets two times a year and is facilitated and supported by Pathways Academy Family Liaison and/or Psychologist.

- The PAG, in conjunction with the Family Liaison, may advise on matters that pertain to the education, health and safety of the students in the program. Minutes are taken at each meeting and mailed out to all families.

- In an effort to seek input from parents and/or guardians, Pathways Academy welcomes the addition of agenda items from parents and/or guardians for the PAG on matters that pertain to the education, health, and safety of the students.

- At the school’s discretion, Pathways Academy may also host parent events such as monthly coffee hours, educational presentations, and/or end of the year graduation/achievement celebrations.
74. Orientation Procedure (Criterion 15.2 [2001-02])

Policy and procedure regarding Clothing Orientation Procedure is outlined in Student Admissions (Criterion 5.1) of Pathways Academy’s Policy and Procedure Manual.
75. Information to be Translated into Languages Other Than English (Criterion 15.3)

When students have parents or guardians with limited English language skills, Pathways Academy ensures that important information is sent to them in a timely manner and provided to them in a language that they understand, either through written translations of documents or through oral interpreters.

- Immediately upon request, Pathways Academy utilizes the translation services of McLean Hospital/Partners Healthcare to provided translated material to said parents or guardians.

- When requested by a parent/guardian, Pathways Academy ensures that information is provided to them in a language that they understand, either through written translations of documents or through oral interpreters.

- When requested by a parent/guardian, Pathways Academy ensures translation of important information in a timely manner.

- Pathways Academy maintains important information in the student record that has been translated for parents/guardians whose primary language is not English.
76. Change of Student’s Legal Status (Criterion 15.4)

Pathways Academy requires a parent or guardian to inform the Director of any changes in a student’s legal status, and of the results of all judicial and administrative proceedings concerning the student. The Director disseminates this information to appropriate personnel.
77. Parent Consent and Required Notification (Criterion 15.5)

Annual consent from a parent/guardian is required for, but not limited to, emergency medical treatment, administration of medication, participation in research, fundraising, publicity, observation, and human sexual education and/or curriculum dealing with human sexuality issues. Pathways Academy documents all attempts to reach parents and guardians and will notify the placing school district when multiple and repeated efforts have been made and have failed to obtain necessary consent.
78. Consent at Age of Majority (Criterion 15.6 [2001-02])

One year prior to the student turning 18 Pathways Academy staff works collaboratively with the sending school district to ensure consent is obtained from the student to continue special education services or a) the parent has sought and received guardianship from a court of competent jurisdiction; b) the student chooses to share decision making with his or her parent; c) the student chooses to delegate continued decision making to his or her parent or other willing adult.
79. Registration of Complaints (Criterion 15.7 [2001-02])

Policy and procedure regarding Registration of Complaints is outlined in Registering Complaints and Grievances – Parents, Students and Employees (Criterion 15.8) of Pathways Academy’s Policy and Procedure Manual.
80. Registering Complaints and Grievances – Parents, Students and Employees (Criterion 15.8)

Upon admission, included in the policy manual is a copy of Pathways Academy’s Complaint and Grievance Policy and Procedure that is reviewed with families, funding agencies and when applicable, students, as part of the admissions process. A copy of the Policy Manual is provided to the student and his/her guardian and funding sources at admission.

Complaints
Pathways Academy makes available to parents, and when applicable students, a set of written procedures that may be used to register complaints regarding the student’s education and care at the school that includes specific timelines and the appeals process.

Informal Complaint
An informal complaint is defined as any question or concern regarding the student’s education and care at the school that is raised to a staff member at Pathways Academy.

- An informal complaint should be directed to the student’s teacher, team leader, parent liaison, and Educational Administrator.
- Any and all such informal complaints will be responded to by either a meeting, telephone contact, or written correspondence that is designed to create the appropriate forum to resolve differences of opinion, clarify information, and intent, and are mutually agreed to have been resolved as a result of that communication.
- Any informal complaint that is not satisfactorily resolved should be moved to the next step by the student, family or funding agency, through filing a formal complaint.
- Parents and students are always welcomed to contact Educational Administrator, Laura Mead, MS.Ed directly at (617) 855-2703 to discuss an informal complaint.

Formal Complaint
A formal complaint represents a very serious question or concern regarding the student’s education and care at the school.

- A formal complaint must be put in writing to officially document the complaint and to trigger the internal resolution procedure.
- The formal complaint should be sent to the Pathway Academy’s Director, Roya Ostovar, PhD (617-855-2847), ROstovar@partners.org, or via mail at 115 Mill Street Belmont, MA 02478. Dr. Ostovar is responsible for investigating and resolving complaints.
- Upon receipt of the formal complaint, Pathways Academy’s Director will contact all parties and schedule a meeting date within seven (7) working days of the receipt of the notification.
- The Director is responsible for notifying senior administrators, the Director of Center for Neurodevelopmental Services and the Program Director of Child and Adolescent Services.
The Director will also forward a copy of the formal complaint notification to the Chief Quality and Risk Management Officer, to insure that the appropriate controls and oversight of the complaint process are adhered to.

- A meeting is held with the person(s) responsible for filing the formal complaint, the complaint is explored, and a resolution is determined along with an action plan to provide guidelines and ensure compliance.

- This resolution is documented on the complaint resolution and action plan form and copies are made available to the person(s) filing the complaint, as well as maintained in the student record and program records and forwarded to the Chief Quality and Risk Management Officer for monitoring and evaluation and quality management review.

- If no resolution is reached in the meeting, written documentation outlining both the original complaint and the attempts to outline resolution will be forwarded to the Chief Medical Officer of McLean Hospital and the Chief Quality and Risk Management Officer for final resolution. Pathways Academy maintains written records of all decisions regarding grievances.

**Student and Staff Grievances**

Pathways Academy makes available to parents, when applicable students, and staff, the grievance procedures for providing for prompt and equitable resolution of complaints alleging discrimination based on legally protected categories (race, color, sex, gender identity, religion, national origin, sexual orientation, disability and homelessness) that includes specific timelines and the appeals process. Pathways Academy is committed to the process of resolving all complaints and grievances raised by staff, students, families, and funding agencies. Pathways Academy takes all complaints and grievances seriously, and strives for prompt and equitable resolution of complaints and grievances.

- Students, parents/guardians/funding agencies and Pathways Academy/ McLean Hospital employees may contact Susan Krueger (617)-855-2161, the McLean Hospital Civil Rights/Grievance Officer to report a grievance directly.

- The McLean Hospital Civil Rights/Grievance Officer is responsible for promptly investigating and equitably resolving discrimination complaints made on behalf of employees and students immediately upon receipt of grievance within seven working days. Students, parents/guardians/funding agencies and Pathways Academy/ McLean Hospital employees may contact the Civil Rights/Grievance Officer if they wish to appeal a decision.

- Pathways Academy and the McLean Hospital Human Resource department maintain written records of all decisions regarding complaints and grievances.
81. Physician Consultation (Criterion 16.2)

Pathways Academy has a licensed physician available for consultation. This physician, a member of the Child and Adolescent Program at McLean Hospital and appointed by McLean Hospital is available by pager.

In scheduled arranged meetings, the consulting physician provides services such as consultation to educational and clinical staff, observation of students within the school setting, communication with the students' private healthcare providers as needed and general in-services on topics such as psychotropic medications. The consulting school physician, in collaboration with the school nurse, is also involved in the development, review and approval of school healthcare policies.

McLean Hospital employs two Medical Doctors on Call (MDOC) that are also available to our staff and students at any time. They can be paged through the McLean operator, calling 617-855-2222.
82. Nursing (Criterion 16.3)

Pathways Academy has allotted 1.0 FTE for School Nursing filled by a full time school nurse. School nursing develops curriculum for, teaches, delegates and supervises the teaching of health classes. School nursing provides first aid for injuries, dispenses and tracks student medication, provides visual, hearing and postural screenings, and provides assessment and nursing treatment of routine health issues, e.g. colds, headaches and other illnesses. In addition, School Nursing consults with staff and parents around health and medication issues. A full time school nurse is adequate for the nursing and teaching functions required by students at Pathways Academy, which is approved for a maximum of 32 students. An Infection Control Nurse is also available to Pathways Academy for consultation.
83. Emergency First Aid and Medical Treatment (Criterion 16.4)

Staff Training
All direct care staff members are trained annually by a certified instructor in Emergency First Aid and CPR. Pathways Academy also has a school nurse available for first aid and medication needs, as well as a licensed physician available for consultation.

Consent for First aid or Emergency Medical treatment
Parents/guardians are to sign consent for emergency medical treatment for their student upon admission to the school and annually, with each school year. No emergency first aid or medical treatment is administered to a student without written authorization from a parent. Authorization must be renewed annually.

Secure Storage
Pathways Academy maintains a secure storage of adequate first aid supplies, including, but not limited to, bandages, body substance isolation gloves, gauze, adhesive tape, and cleaning solutions.

First Aid Supplies and Important Phone Numbers
First Aid supplies are easily available in all classrooms and major activity areas. Pathways Academy posts the telephone numbers of the fire department, police station, poison control center, ambulance service and nearest hospital emergency room in every room.

Procedures for Illness or Emergency
The Pathways Academy School Nurse or designee will provide basic care to students, including but not limited to basic first aid, when necessary. He or she will determine if further treatment is warranted.

- In case of emergency, the McLean Hospital Medical Doctor on Call (MDOC) will be called. In such an event, the Nurse, or designee, will notify parents, designated emergency contacts when a parent cannot be reached, or the Department if Children and Family Services (in the event a child is under the care of DCF).
- In the case of a student sent home for illness, parents are responsible for contacting the transportation company if the student is no longer in need of their ride home from school at the end of the day.
- Pathways Academy does not transport students to emergency facilities; in the event emergency care is needed, McLean Hospital Security will call for an ambulance.

In Illness or Emergency-If Parents Cannot be Reached
In the event of an emergency, treatment will be provided immediately with or without contact to the student’s parent/guardian while a designated staff member will continue efforts to make contact with the student’s parent/guardian or emergency contacts as listed.
Pathways Academy Sudden Cardiac Arrest Protocol

The school nurse/milieu manager will direct staff until the MDOC/Nurse Practitioner arrives, then work with medical staff to coordinate the code.

I. Staff will call 617-855-2222 place a “CODE CALL” - identifying themselves and the unit/building floor.
II. Initiate CPR and bring the AED from the nurse’s station to the victim
III. Staff Trained in Use of AED

A. All Pathways Staff:
   1. Establish that victim is not breathing and begin CPR
   2. Turn on Automated External Defibrillator (AED)
   3. Apply electrodes to the victim’s chest
   4. Follow voice prompts of AED

B. Teachers and School Counselors (Aides):
   1. Initiate basic life support, and assist as needed.
   2. Stand near door directing assistive staff from other units towards the location of victim
   3. Remove students from the area of the victim
   4. Follow directives of medical staff

C. Nurses’ w/ Modified Advanced Life Support (MALS):
   1. Reassess victim for consciousness
   2. Assure that Basic Life Support (BLS) is being done appropriately – rotate staff for chest compressions/respirations as appropriate
   3. Turns on O₂ and connects to pocket mask for ventilation
   4. Assist Medical Doctor on Call (MDOC)/Registered nurse (RN)’s sent to code with
      a. hanging IV’s
      b. preparing advance airway equipment
      c. preparing medications (i.e., epinephrine, atropine, etc.)
      d. preparing for suctioning
   5. Administer MALS interventions at direction of the MDOC/Nurse Practitioner (NP)
   6. Document victim’s status and interventions throughout code

D. Security
   1. Calls the MDOC
   2. Calls ambulance for BLS and Advanced Cardiac Life Support (ACLS)
   3. Notifies closest Unit to send MALS nurse to code
   4. Brings equipment to code site
   5. Assists with BLS
   6. Announces arrival of ambulance

E. Medical Doctor on Call (MDOC)
1. Directs Code
2. Starts IV

IV. Ambulance arrives, have hallways clear. Paramedics transport, (nurse, MDOC, or NP may be asked to accompany)

V. Document code, support victim’s peers as necessary

**AED Maintenance**
The seal and AED screen will be checked daily to make sure it is intact and displays “OK” respectively. Mock codes will be conducted at the discretion of McLean Hospital.

**Field Trip First Aid and Emergency Health Procedures**
When on a field trip, a Pathways Academy staff member accompanying the students will take along a backpack that includes the portable first aid kit and a copy of the students’ emergency contact information. When not in use, these backpacks are kept in the storage closet in the West Hall, accessible by key. The school nurse is responsible for biweekly checking of the supplies in these backpacks and replenishing as necessary. In addition, staff members carry walkie-talkies on field trips as well as cell phones to be best able to support one another and all the students in the event of an emergency while on a field trip.

For any student going on a field trip that has a licensed prescriber’s order for an EpiPen or other emergency rescue medication, the school nurse will include those medications in the first aid backpack, along with a copy of the student’s emergency treatment plan. Upon return of the field trip, the school nurse ensures such medications have been returned to their storage places within the medication room.
84. Administration of Medication (Criterion 16.5)

Initial Guidelines:
- No medication is administered to a student without written authorization from a parent. Such authorization shall be renewed annually.
- No prescription medication shall be administered to a student without the written order of the physician prescribing the medication to that student.
  - For short-term prescription medications, i.e., those requiring administration for ten school days or fewer, the pharmacy-labeled container may be used in lieu of a licensed prescriber's order. If the nurse has a question, she may request a licensed prescriber's order. 105 CMR: Department of Public Health: 210.005
- The program maintains written policies and procedures regarding prescription and administration of medication including authorization, prepackaging and staff training.
- Any change of medication or dosage must be authorized by a new order from a physician.
- A written record shall be maintained of the prescription of medication to students. A written record shall also be maintained of the administration of prescribed medication to students.
- Significant side effects of medications are recorded on the original medication order.
- Only trained staff may administer medication.
- All medicine shall be kept in a locked, secure cabinet and labeled with the student's name, the name of the drug and the directions for its administration.
- A review of medications administered to a student is incorporated into all progress reviews conducted for the student.
- Medications must be delivered to the school by a responsible adult in a container labeled by the physician or pharmacist.
- Provisions are made for refrigeration of medication in the School Nurse's office, when necessary.
- No more than a thirty (30) school day supply of the medication for a student shall be stored at the school.
- A review of medications administered to a student is incorporated into all progress reviews conducted for the student.
- The School Nurse documents communication to prescribing physicians and parents regarding any side effects and changes in the student's behavior or health that may result from medication.

I. Management of the Medication Administration Program
A. The school nurse assigned responsibility for Pathways’ Medication Administration Program is the school nurse whom, on behalf of the Schools of McLean Hospital, has obtained medication delegation privileges from the Massachusetts Department of Public Health and is in compliance with promulgated regulations governing medication delegation in the private and public school setting from the Massachusetts’ Department of Public Health and the Massachusetts' Board of Registration for Nursing.

B. The Nurse Manager will develop and propose to the School Committee or Board of Trustees policies and procedures relating to the administration of medications in compliance with the Massachusetts' Department of Public Health.
C. Medication Orders/Parent Consent

The school nurse will ensure that there is a proper medication order from a licensed prescriber which is renewed as necessary, with changes, at the start of each academic year. A telephone order for a medication or for any change in a medication shall be received only by the school nurse. Any such verbal order must be followed by a written order signed by the prescribing physician within three school days. Whenever possible, the medication order shall be obtained, and the medication administration plan shall be developed, before the student enters or re-enters school.

In accordance with standard medical practice, a medication order from a licensed prescriber shall contain:

- The student’s name
- The name and signature of the prescriber and business and emergency telephone numbers
- The name of the medication
- The route and dosage of the medication
- The frequency and time of the medication
- The date of the order and discontinuation date
- If there is no discontinuation date the order will be deemed to have expired at the end of the school year
- A diagnosis and any other medical condition (s) requiring medication (if not a violation of confidentiality or if not contrary to the request of a parent/guardian or student to keep confidential)
- Any specific directions for administration

Medication orders must be renewed each academic year

- Every effort shall be made to obtain from the licensed prescriber the following additional information, if appropriate
- Any special side effects, contraindications and adverse reactions to be observed
- Any other medications being taken by the student
- The date of the next scheduled visit, if known

Special Medication Situations

- For short-term medications, i.e., those requiring administration for ten school days or fewer, the pharmacy-labeled container may be used in lieu of a licensed prescriber’s order; if the nurse has a question, he/she may request a licensed prescriber’s order.
- For “over-the-counter” medications, i.e., nonprescription medications, including, but not limited to ibuprofen and acetaminophen for headaches and menstrual cramps, the school nurse will follow the Board of Registration in Nursing’s protocols regarding administration of over-the-counter medications in schools.
- Investigational new drugs may be administered in the schools with (a) a written order by a licensed prescriber, (b) written consent of the parent or guardian, and (c) a pharmacy-labeled container for dispensing. If there is a question, the school
nurse may seek consultation and/or approval from the school physician to administer the medication in the school setting.

- The school nurse will ensure that there is a written authorization by the parent or guardian, which contains:
  - The parent or guardian’s printed name, signature, and an emergency phone number
  - A list of all medications the student is currently receiving, if not a violation of confidentiality or contrary to the request of the parent, guardian or student that such medication not be documented
  - Approval to have the school nurse or school personnel designated by the school nurse administer the medication
  - Persons to be notified in case of a medication emergency, in addition to the parent and licensed prescriber

D. Medication Administration Plan
The school nurse, in collaboration with the parent or guardian whenever possible, will establish a medication administration plan for each student receiving a medication. Whenever possible, a student who understands the issues of medication administration shall be involved in the decision-making process and his/her preferences respected to the maximum extent possible. In Massachusetts, students 18 years of age or older are considered adults and parental/guardian involvement is not required, unless guardianship has been granted. If appropriate, the medication administration plan will be referenced in any health or educational plan developed pursuant to the Massachusetts Special Education Law (Individual Education Plan under Chapter 766) or federal laws, such as the Individuals with Disabilities Education Act (IDEA) or Section 504 of the Rehabilitation Act of 1973.

Prior to the initial administration of the medication, the school nurse will assess the child’s health status and develop a medication administration plan, which includes:

- The name of the student
- An order from a licensed prescriber, including business and emergency telephone numbers
- The signed authorization of the parent or guardian, including home and business telephone numbers
- Any known allergies to food or medications
- The diagnosis, unless a violation of confidentiality or the parent or guardian or student requests that it not be documented
- The name of the medication
- The dosage of the medication, frequency of administration and route of administration
- Any specific directions for administration
- Any possible side effects, adverse reactions or contraindications
- The quantity of the medication to be received by the school from the parent or guardian
- The required storage conditions
- The duration of the prescription
- The designation of unlicensed school personnel, if any, who will administer the medication to the student in the absence of the nurse, and plans for back-up if the designated persons are unavailable
- Plans, if any, for teaching self-administration of the medication
- Unless requested in writing by a parent or guardian, staff will be notified of medication administration and possible adverse effects of the medication
- A list of other medications being taken by the student, if not a violation of confidentiality or contrary to the request of the parent, guardian or student that such medication not be documented
- When appropriate, the location where the administration of the medication will take place
- A plan for monitoring the effects of the medication
- Provision for medication administration in the case of field trips and other short-term special school events. Every effort shall be made to obtain a nurse or school staff member trained in medication administration to accompany students at special school events. When this is not possible, the school nurse may delegate medication to another responsible adult. Written consent from the parent or guardian for the named responsible adult to administer the medication shall be obtained. The school nurse shall instruct the responsible adult on how to administer the medication to the child.
- The school nurse will develop a procedure to enlist the positive identification of the student who receives the medication.
- The school nurse will communicate significant observations relating to medication effectiveness and adverse reactions or other harmful effects to the child’s parent or guardian and/or licensed prescriber.

In accordance with standard nursing practice, the school nurse may refuse to administer or allow to be administered any medication, which, based on his/her individual assessment and professional judgment, has the potential to be harmful, dangerous or inappropriate. In these cases, the parent/guardian and licensed prescriber shall be notified immediately by the school nurse and the reason for refusal explained.

For the purposes of medication administration, the Licensed Practical Nurse functions under the general supervision of the one who has delegating authority. (Medication administration is within the scope of practice for the Licensed Practical Nurse under M.G.L. Chapter 112.) The school nurse will have a current pharmaceutical reference available for her/his use, such as the Physician’s Desk Reference (PDR) or U.S.P.D.I. (Dispensing Information), Facts and Comparisons.
E. Delegation/Supervision
Pathways Academy and The Board of Trustees, in consultation with the Massachusetts Board of Health, where applicable, does authorize that the responsibility for the administration of medication may be delegated to the following categories of unlicensed school personnel according to criteria delineated in CMR 210.004 (B) (2): (copy of 105 CMR 210.000 in its entirety is to be kept with health care manual/medication administration policy to look up references made to it throughout this document.)

- Administrators
- Teachers
- Licensed health personnel
- School Counselors
- Secretaries

For the purpose of administering emergency medication to an individual child, including parental administration (i.e. by injection) of epinephrine pursuant to 210.004 (B) (4), the Nurse Manager may identify individual school personnel or additional categories. Said school personnel will be listed on the medication administration plan and receive training in the administration of emergency medication to a specific child.

- The Nurse Manager, in consultation with the school physician, will have final decision-making authority with respect to delegating administration of medications to unlicensed personnel in school systems registered with the Department of Public Health.
- When medication administration is delegated by the Nurse Manager to unlicensed school personnel, such personnel will be under the supervision of the Nurse Manager and nurse designee, for the purposes of medication administration.
- A school nurse will be on duty in the school system while medications are being administered by designated unlicensed school personnel, and available by telephone should consultation be required. Pathways Academy has a Medical Doctor on Call (MDOC) by calling 2222.
- The administration of parenteral medications may not be delegated, with the exception of epinephrine where the child has a known allergy or preexisting medical condition and there is an order for administration of the medication from a licensed prescriber and written consent of the parent or guardian.
- Prescription medications to be administered pursuant to p.r.n. (“as needed”) orders may be administered by authorized school personnel after an assessment by or consultation with the school nurse for each dose.
- Pathways Academy maintains an updated list of unlicensed school personnel who have been trained in the administration of medications will be maintained. Upon request, a parent shall be provided with a list of school personnel authorized to administer medications.

Supervision of Unlicensed Personnel
Authorized unlicensed personnel administering medications will be under the supervision of the Nurse Manager. Pathways Academy, in consultation with the Board of Health where appropriate, will provide assurance that sufficient school nurse(s) are available to provide proper supervision of unlicensed school personnel. Responsibilities for supervision at a minimum shall include the following:

- After consultation with the Educational Administrator or Program Director, the school nurse will select, train and supervise the specific individuals, in those categories of school personnel approved by the Board of Trustees, in consultation with the Board of Health when appropriate, who may administer medications. When necessary to protect student health and safety, the Nurse Manager may rescind such selection.
- The number of unlicensed school personnel to whom responsibility for medication administration may be delegated is determined by:
  - The number of unlicensed school personnel the school nurse can adequately supervise on a weekly basis as determined by the Nurse Manager and nurse designee, and
  - The number of unlicensed school personnel necessary, in the Nurse Manager judgment, to ensure that the medications are properly administered to each student.

The Nurse Manager shall supervise the training of the designees consistent with the Department of Public Health’s requirements in CMR 210.007 of the Regulations Governing the Administration of Prescription Medications in Public and Private Schools.

- The school nurse will document the training and evidence of competency of unlicensed personnel designated to assume the responsibility for medication delegation.
- The school nurse will provide a training review and informational update, at least annually, for those school staff authorized to administer medications.

The school nurse will support and assist persons who have completed the training to prepare for and implement their responsibilities related to the administration of medication. The first time that unlicensed school personnel administer medication, the delegating nurse shall provide supervision at the work site.

The degree of supervision required for each student will be determined by the Nurse Manager after an evaluation of the appropriate factors involved in protecting the student’s health including, but not limited to the following:

(1) Health condition and ability of the student
(2) The extent of training and capability of the unlicensed school personnel to whom the medication administration is delegated;
(3) The type of medication; and (4) the proximity and availability of the school nurse to the unlicensed person who is performing the medication administration.
Personnel designated to administer medications will be provided with the names and locations of school personnel who have documented certification in cardiopulmonary resuscitation. Pathways Academy will make every effort to have a minimum of two school staff members with documented certification in cardiopulmonary resuscitation present throughout the day.

For the individual child, the school nurse will:

- Determine whether or not it is medically safe and appropriate to delegate medication administration
- Administer the first dose of medication, if (a) there is reason to believe there is a risk to the child as indicated by the health assessment, or (b) if the student has not previously received this medication in any setting
- Review the initial orders, possible side effects, adverse reactions and other pertinent information with the person to whom medication administration has been delegated
- Provide supervision and consultation as needed to ensure that the student is receiving the medication appropriately. Supervision and consultation may include record-review, on-site observation and/or student assessment
- Review all documentation pertaining to medical administration every two weeks or more often as necessary

II. Self Administration of Medications

“Self administration” means that the student is able to consume or apply medication in a manner directed by the licensed prescriber, without additional assistance or direction.

A student may be responsible for taking his/her own medication after the school nurse has determined that the following requirements are met:

- The student, school nurse and parent/guardian, where appropriate, enter into an agreement which specifies the conditions under which medication may be self administered.
- The school nurse, as appropriate, develops a medication administration plan which contains only those elements necessary to ensure safe self-administration of medication.
- The student’s health status and abilities have been evaluated by the school nurse who then deems self-administration safe and appropriate. As necessary, the school nurse will observe initial self-administration of the medication.
- The school nurse is reasonably assured that the student is able to identify the appropriate medication, knows the frequency and time of day for which the medication is ordered.
- There is written authorization from the student’s parent or guardian that the student may self medicate, unless the student has consented to treatment under M.G.L c. 112, s. 12F or other authority permitting the student to consent to medical treatment without parental permission.
- If requested by the school nurse, the licensed prescriber provides a written order for self-administration.
• The student follows a procedure for documentation of self-administration of medication.
• The Nurse Manager establishes a policy for the safe storage of self-administered medication and, as necessary, consults with teachers, the student and parent/guardian, if appropriate, to determine a safe place for storing the medication for the individual student, while providing for accessibility if the student’s health needs require it. This information shall be included in the medication administration plan. In the case of an inhaler or other preventive emergency medication, whenever possible, a back-up supply of the medication shall be kept in the Nurse’s Office.
• The student’s self-administration is monitored based on his/her abilities and health status. Monitoring may include teaching the student the correct way of taking the medication, reminding the student to take the medication, visual observation to ensure compliance, recording that the medication was taken, and notifying the parent, guardian or licensed prescriber of any side effects, variation from the plan, or the student’s refusal or failure to take the medication.
• With parental/guardian/ student permission, as appropriate, the school nurse may inform appropriate teachers and administrators that the student is self-administering a medication.
• All student epinephrine pens are kept in the nurse’s office at Pathways Academy in an unlocked location beyond the door to the nurse’s office, for ease of nurse/teacher/staff retrieval in the incidence of a severe allergic reaction of students known to be diagnosed with such.
• Pathways Academy nurse determines on a case by case basis if it is appropriate for student to be granted permission to self administer medication

III. Handling, Storage and Disposal of Medications
A parent, guardian or parent/guardian-designated responsible adult shall deliver all medications to be administered by school personnel or to be taken by self-medicating students (if required by the self administration agreement) to the school nurse or other responsible person designated by the school nurse.

• The medication must be in a pharmacy labeled container.
• The school nurse or other responsible person receiving the medication shall document the quantity of the medication delivered.
• In extenuating circumstances, as determined by the school nurse, the medication may be delivered by other persons, provided that the nurse is notified in advance by the parent or guardian of the arrangement and the quantity of the medication being delivered to the school.

All medications are to be stored in their original pharmacy or manufacturer labeled containers and in such as to render them safe and effective. Expiration dates will be checked. A container with an expired expiration date cannot be used to store a medication administered at school.

All medications to be administered by school personnel shall be kept in a securely locked cabinet except when opened to obtain medications.
• The cabinet shall be substantially constructed and anchored securely to a solid surface.
• Medications requiring refrigeration shall be stored in either a locked box in a refrigerator or in a locked refrigerator maintained at the temperatures of 38 to 42 degrees Fahrenheit.
• Access to stored medications shall be limited to persons authorized to administer medications.
• Access to keys and knowledge of the location of the keys shall be restricted to the maximum extent possible.
• Students who are self-administering medication shall not have access to other students’ medications.

Parents or guardians may retrieve the medications from school at any time.
• Medication will not be returned to parents via delivery service including, but not limited to, USPS, UPS and FedEx.
• No more than a thirty (30) school day supply of the medication for a student shall be stored at the school.
• When possible, all unused, discontinued or outdated medications shall be returned to the parent or guardian and the return appropriately documented. In extenuating circumstances, with parental consent when possible, such medications may be destroyed by the school nurse in accordance with any applicable policies of the Massachusetts Department of Public Health, Division of Food and Drugs. All medications should be returned at the end of the school year.

IV. Documentation and Record-Keeping
Pathways Academy maintains a medication administration record for each student who receives medication during school hours.
• Pathways Academy’s medication record includes a daily log and a medication administration plan, including the medication order and parent/guardian authorization.
• The medication administration plan includes the information as described in Section 210.005 (E) of the Regulations Governing the Administration of Prescription Medications in Public and Private Schools.
• The daily log contains:
  o The dose or amount of medication administered
  o The date and time of administration or omission of administration
  o The full signature of the nurse or designated unlicensed school personnel administering the medication. If the medication is given more than once by the same person, he/she may initial the record, subsequent to signing a full signature.
• The school nurse will document in the medication administration record significant observations of the medication’s effectiveness, as appropriate, and any adverse reactions or other harmful effects, as well as any action taken.
• All documentation will be recorded in ink and shall not be altered.
• With the consent of the parent, guardian, or student where appropriate, the completed medication administration record and records pertinent to self-administration shall be filed in the student’s cumulative health record. When the parent, guardian or student, where
appropriate, objects, these records will be regarded as confidential medical notes and will be kept confidential.

Pathways Academy complies with the Department of Public Health’s reporting requirements for medication administration in the schools. The Department of Public Health may inspect an individual student medication record or records relating to the administration or storage of medications without prior notice to ensure compliance with the regulations governing the Administration of Prescription Medications in Public and Private Schools.

V. Reporting and Documentation of Medication Errors
A medication error includes any failure to administer medication as prescribed for a particular student, including failure to administer the medication:

- Within appropriate time frames (the appropriate time frame should be addressed in the medication administration plan),
- In the correct dosage,
- In accordance with accepted practice, and
- To the correct student.
- In the event of a medication error, the school nurse will notify the parent or guardian immediately (the school nurse shall document the effort to reach the parent or guardian). If there is a question of potential harm to the student, the nurse shall also notify the student’s licensed prescriber or school physician.
- Medication errors will be documented by the school nurse on the accident/incident report form. These reports shall be retained in the School Director’s office. They will be made available to the Department of Public Health upon request. All medication errors resulting in serious illness requiring medical care shall be reported to the Department of Public Health, Bureau of Family and Community Health, School Health Unit. All suspected diversion or tampering of drugs shall be reported to the Department of Public Health, Division of Food and Drugs.
- The school nurse will review reports of medication errors and take necessary steps to ensure appropriate medication administration in the future.

VI. Response to Medication Emergencies and injections of poison, including but not limited to overdoses of prescription medication and cleaning fluids
In the event of a medication emergency staff should:
- when on campus, call 2-2-2-2 and when off campus call 9-1-1 and indicate that there has been an ingestion of an unknown substance
- if off campus, call Pathways Academy
- contact the parent/guardian
- if necessary provide CPR
- document what was taken if known, how much and when

VII. Administration of Epinephrine by Auto-Injector to Individuals Experiencing Life-Threatening Allergic Reactions

The school nurse responsible for the school’s medication administration program or nurse
designee may train unlicensed personnel to administer epinephrine by auto-injector to individuals with diagnosed life-threatening allergic events per DPH Medication Delegation for situations during the school day when a school nurse is not immediately available, including field trips.

- Policies are developed for the administration of unlicensed school personnel by the school nurse responsible for the program, along with a nurse designee.
- The approval for the administration of epinephrine by unlicensed school personnel is updated annually through obtainment of Full Medication Delegation Privileges.
- The school nurse responsible for the school’s medication administration program, in consultation with the school physician, manages the training program, with full decision-making authority.
- The school nurses will select the individuals authorized to administer epinephrine by auto-injector. Persons authorized to administer epinephrine shall meet the requirements of section 210.004(B) (2)
- The school nurse will document the training and testing of competency.
- The school nurse provides training review/ informational update at least twice a year.

Training, at a minimum, includes:
- Procedures for risk reduction
- Recognition of the symptoms of a severe allergic reaction
- The importance of following the medication administration plan
- Proper use of the auto-injector
- Requirements for proper storage and security
- Notification of appropriate persons following administration and
- Record keeping

Pathways Academy maintains and makes available, upon request by parents or staff, a list of those school personnel authorized and trained to administer epinephrine by auto-injector in an emergency, when the school nurse is not immediately available.

Epinephrine will be administered only in accordance with an individual medication administration plan satisfying the applicable requirements of 105 CMR 210.005(E) and 210.009(A) (6), updated every year which includes the following:

- A diagnosis by a physician that the child is at risk of a life threatening allergic reaction and a medication order containing proper dosage and indications for administration of epinephrine
- Written authorization by a parent or legal guardian
- Home and emergency number for the parent(s) or legal guardian(s), as well as the name(s) and phone number(s) of any other person(s) to be notified if the parent(s) or guardian(s) are unavailable
- Epinephrine is stored in the nurse’s station in a box labeled with the student’s name.
- Epinephrine is brought on outings when necessary
- A plan for comprehensive risk reduction for the student, including preventing exposure to specific allergens, and
• An assessment of the student’s readiness for self-administration and training, as appropriate

When epinephrine is administered, there will be immediate notification of the local emergency medical services system, followed by notification of the student’s parent(s) or guardian(s) or, if the parent(s) or guardian(s) are not available, any other designated person(s), the school nurse, the student’s physician, and the school physician, to the extent possible.

• Because of the danger of biphasic reactions, assessment of whether or not the child should be transported by trained emergency medical personnel to the nearest emergency medical facility will be done by the MDOC.
• It is the policy of McLean Hospital, campus-wide; to call 617-855-2222 which is the emergency number, state that a student is having an anaphylactic reaction, location of student, that a first dose of epinephrine has been given and that the Medical Doctor On Call (MDOC) is needed immediately.
• Pathways Academy does not have before-and-after school programs and thus does not administer medication before and after school including, but not limited to Epinephrine.

VIII. Dissemination of Information to Parents/Guardians Regarding Administration of Medication. Such information can be found in the Health Care Manual available to parents/guardians upon request.

IX. Procedures for Resolving Questions between the School and Parents/Guardians Regarding Administration of Medications. Questions are directed to the school nurse and program director or their designee.

X. Policy Review and Revision. Policies and procedures are reviewed on an annual basis and more often when necessary.

*NOTE: Pathways Academy Administration of Medication Policy was written in accordance with DESE Criterion 16.5 and DPH Health Care Manual 603 CMR 18.05(9)(f),105 CMR 210.007,105 CMR 210.100. Consult the DESE and DPH for the complete original standards.
85. Administration of OTC Medication

The Pathways Academy nurse, or their trained designee with consultation with nurse, may administer Acetaminophen or Ibuprofen to a student with written permission from a parent or guardian for the relief of minor pain subsequent to assessment by said nurse. The Pathways Academy nurse, or their trained designee with consultation with nurse, may administer insect repellent and/or sunscreen, as provided by the parent, to a student with written permission from a parent or guardian.
86. Administration of Antipsychotic Medication (Criterion 16.6)

Pathways Academy does not prescribe medication for its students. The school, instead, administers medication (including antipsychotics) only as per the written direction of the student’s prescribing physician. As such, these outside physicians are responsible for determining the indication and need for such medication. A McLean Child and Adolescent Psychiatrist is available to Pathways Academy students for psychopharmacology, on a case by case basis, as determined by the psychiatrist.

- Antipsychotic medication shall be prescribed by a licensed physician for the diagnosis, treatment, and care of the child and only after review of the student’s medical record and actual observation of the student.

- If antipsychotic medication is prescribed, the prescribing physician submits a written report to the school detailing information cited in the regulations:
  - The necessity for the medication
  - Staff monitoring requirements
  - Potential side effects (including those that could require medical attention)
  - The next scheduled clinical meeting or series of meetings with the student.

- No antipsychotic prescription shall be administered for a period longer than is medically necessary and students on antipsychotic medication must be carefully monitored by physician.

- Staff members providing care to a student receiving antipsychotic medication are instructed by Pathways Academy’s School Nurse in conjunction with the consulting psychiatrist as to the nature of the medication, potential side effects that may or may not require medical attention and required monitoring or special precautions, if indicated.

- Except in an emergency, as defined in 603 CMR 18.05 (9)(g), Pathways Academy neither administers nor arranges for the prescription and administration of antipsychotic medication unless informed written consent is obtained from the custodial parent, or Department of Children and Families.

- If a student is in the custody of his/her parents, parent consent in writing is required. Parental consent may be revoked at anytime unless subject to a court order. If the parent does not consent or is not available to give consent, the referral sources will be notified and judicial approval will be sought.

- If a student is in the custody of a person other than the parent, a placement agency, or out of state public or private agency, the referral sources will be notified and judicial approval shall be sought.

- In an emergency situation, antipsychotic medication may be administered for treatment purposes without parental consent or prior judicial approval if an unforeseen combination of
circumstance or the resulting state calls for immediate action and there is no less intrusive alternative to the medication.

- The treating physician must determine that such medication is necessary to prevent the immediate substantial and irreversible deterioration of a serious mental illness. If the treating physician determines that medication should continue, informed consent or judicial approval must be obtained as required by CMR 603 18.05(9) (e).

- Pathways Academy informs students, twelve years of age and older, consistent with the student’s capacity to understand, about the treatment risks, and potential side effects of such medication.

- If a student refuses to consent to administration of the antipsychotic medication, Pathways Academy will not routinely administer a scheduled antipsychotic medication dose to a child who is refusing to swallow the pill.

- Parents will be contacted and if a threat to self or others, the student will be held at the McLean Clinical Evaluation Center (CEC) for parental pickup. At the CEC, the parent may choose to work with the attending physician to arrange for hospitalization.

- Only in the circumstance of such child being in imminent danger to themselves and/or those around him/her, in accordance with our Behavioral Management and Restraint Policies, would we potentially need to call McLean Hospital Security and send the child to an emergency room or the McLean Clinical Evaluation Center (CEC) where, after clinical evaluation, chemical restraint might be required.
87. Preventive Health Care (Criterion 16.7)

Dental and Physical Examination
Pathways Academy, in cooperation with the student’s parents/guardians and/or human service agency, ensures provision for each student to receive an annual dental examination. Pathways Academy ensures that every student is separately and carefully examined by a duly licensed physician, nurse practitioner or physician assistant upon admission (within one year prior to entrance to program or within 30 days after program entry) and every 3-4 years afterwards. Pathways Academy requires a written report from the physician(s) of the results of the examination and any recommendation and/or modification of the student’s activity.

- Parents/ guardians, or the human service agency is asked to provide documentation of current medical and dental examinations (within 13 months) at the beginning of the school year from the student’s medical and dental care providers.
- The school nurse can assist in parent/guardian facilitation of finding a suitable medical and dental care providers if the student does not have one.
- Pathways Academy reserves the right to request in writing proof of medical and dental examinations at any time.
- Pathways Academy requires a copy of a signed current (within the year) physical and dental examination prior to entry into school.
- In the event that a current dental and/or physical examination is not available, the family/guardian must initially provide the most recent dental and/or physical examination and immediately contact providers to get a current examination scheduled.
- Pathways Academy requires a written report, from the examining practitioner, regarding the results of the examination and any recommendation(s) pertaining to and/or modification(s) of the student’s activity.

Visual, Hearing and Postural Screenings
Pathways Academy conducts annual vision and hearing screenings for all students. Pathways Academy conducts postural screenings are conducted. Tests ascertaining postural defects are administered once annually in grades 5 through 9.

Communicable Disease
Pathways Academy follows the procedures regarding the reporting of a communicable disease as set forth by McLean Hospital:

- In the event that a communicable disease is confirmed or suspected, the Educational Administrator, or designee, will report this information to the McLean Hospital Occupational Health Nurse.
- The McLean Hospital Occupational Health Nurse will notify the local board of health in accordance with M.G.L. c. 111, section 111.
- The Pathways Academy School Nurse, or designee, will notify all parents and referring agencies of the introduction of a reported communicable disease into the school.
- Pathways Academy requires that a staff member or student who has reported a communicable disease must be authorized by a physician to return to school.
Secure Storage
Pathways Academy provides locked, secured cabinets to keep all toxic substances, medications, sharp objects and matches out of reach of students.

- Medications and medical supplies are locked in a separate cabinet from toxic substances. Toxic substances are labeled with contents and antidote.
- The phone number for the Poison Control Center is clearly posted in every room near the telephone.

Family Planning
If and when appropriate, the School Nurse will provide or arrange for the provision of family planning information, subject to any applicable state or federal legislation.

Immunizations
In accordance with Massachusetts state law, Pathways Academy requires all students in grade K-12 attending schools within the state must be properly immunized.

- The law and regulations provide for exclusion of students from school if immunizations are not up to date, but permit exemptions for medical and religious reasons.
- Documentation of such exemptions for students is to be included in the school health file. Immunization records must be kept current for each student.
- A copy of the student’s most current immunization record must be provided each school year to be kept in the student’s health file.
88. Receipt of Medical Treatment – Religious Beliefs (Criterion 16.8)

Pathways Academy does not require a student to receive medical treatment when a parent objects on the grounds of sincere religious belief, absent emergency or epidemic disease declared by the Department of Health.
89. Student Allergies (Criterion 16.11)

Parents/guardians will indicate on students’ annual school forms any known allergies their child may have.

- The school nurse will keep an up-to-date list of student allergies to foods, chemicals, and/or materials.
- This list will be reviewed with direct-care staff by the school nurse, or designee, upon a new students’ admission, annually and quarterly; it is kept in the Nurse’s office in the “Nurse’s Binder” for the current school year.
- The school nurse will also devise any plans necessary for the protection of students in regards to allergies.
- Should any student have food allergies, this information will be easily available while maintaining student confidentiality as review for staff to plan accordingly prior to the serving of or assisting the student in obtaining food.
- In the event that parents would like the consumption of certain foods to be limited or avoided for reasons other than allergy, they must provide written documentation and guidelines from a physician or a nutritionist.
- Pathways will support a non-allergy plan as long as it does not lead to aggression or impair the student’s ability to participate in the learning process.
- Cleaning agents and chemicals are kept in a secure area.
- Pets are not allowed at school due to animal fur allergies and potential student fears/phobias. Service animals are welcome.

Life Threatening Allergic Reactions

It is the responsibility of the school nurse that any student with a known and documented life-threatening allergy have an emergency treatment plan signed by the student’s private physician and provided to school upon the students’ entering the school and at the start of each academic year.

- The school nurse will also ensure that the family will supply at least one appropriate dose EpiPen for the student which was prescribed by the student’s private health care provider.
- With Massachusetts Medication Delegation privileges, the school nurse is legally empowered to train selected staff in EpiPen administration for students with a known life-threatening allergy in response to an anaphylactic reaction.
90. Smoking and Tobacco (Criterion 16.12)

Pathways Academy prohibits the use of any tobacco products within school buildings, facilities, grounds, or on school buses by any individual, including school personnel.
91. Transportation Safety (Criterion 17.1)

McLean Hospital’s Facilities department ensures that McLean vehicles are safe and insured. In the event that the Pathways Academy staff member who is driving the vehicle has a cellular phone with them, the driver must keep their cellular phone in the glove compartment while the key is in the ignition. McLean Hospital’s Facilities department certifies staff members as approved drivers. McLean Hospital keeps current copies of staff members’ driver’s licenses on a file.
92. Confidentiality of Student Records (Criterion 18.1)

Pathways Academy maintains current and complete files for each publicly funded enrolled Massachusetts student and manages files consistent with the Massachusetts Student Record Regulations.

- Pathways Academy’s Educational Administrator is responsible for oversight and maintenance of student records.
- Pathways Academy will make the individual records of enrolled Massachusetts students available to the DESE upon request.
- Staff notes or reports regarding a student are dated and signed by persons making entries.
- A log of access is kept as part of each student’s record.

  - In the event that parts of the student record are separately located, a separate log is kept with each part.
  - The logs indicate the name, position, signature and, if a third party, the affiliation if any, of the person who is to receive the information, the date of access, the parts of the record to which access was obtained, and the purpose of such access.
93. Anti-Hazing (Criterion 19)

Pathways Academy issues a copy of Massachusetts General Law. c.269 §§ 17 through 19, and a copy of the school’s anti-hazing disciplinary policy to every secondary-age student enrolled full-time.

- Pathways does not have affiliated or unaffiliated groups teams, student organizations, or extracurricular activities. In the event that Pathways Academy was to have affiliated or unaffiliated student groups, teams, or organizations, they would be given a copy of Pathways Academy anti-hazing disciplinary policy approved by the program’s Director.
- In the event of a hazing incident, Pathways Academy administrators will meet with members of the clinical team to determine the length of suspension and any other disciplinary action to be taken against participants.

Pathways Academy files an annual report with the Department of Elementary and Secondary Education, certifying:

- Compliance with the responsibility to inform student groups, teams, or organizations and every full-time enrolled student, of the provisions of M.G.L. c. 269 §§ 17 through 19
- Adoption of a disciplinary policy with regard to the organizers and participants of hazing
- Assurance hazing policy has been included in the student handbook or other means of communicating school program policies to students.
Massachusetts Anti-Hazing Law

269:17 HAZING; ORGANIZING OR PARTICIPATING; HAZING DEFINED.
Whoever is a principal organizer or participant in the crime of hazing, as defined herein, shall be punished by a fine of not more than three thousand dollars or by imprisonment in a house of correction for not more than one year, or both such fine and imprisonment.

The term hazing" as used in this section and in sections eighteen and nineteen, shall mean any conduct or method of initiation into any student organization, whether on public or private property, which willfully or recklessly endangers the physical or mental health of any student or other person. Such conduct shall include whipping, beating, branding, forced calisthenics, exposure to the weather, forced consumption of any food, liquor, beverage, drug or other substance, or any other brutal treatment or forced physical activity which is likely to adversely affect the physical health of any such student or other person, or which subjects such student or other person to extreme mental stress, including extended deprivation of sleep or rest or extended isolation. Notwithstanding any other provisions of this section to the contrary, consent shall not be available as a defense to any prosecution under this action.

269:18 FAILURE TO REPORT HAZING.
Whoever knows that another person is the target of hazing as defined in section seventeen and is at the scene of such crime shall, to the extent that such person can do so without danger or peril to himself or others, report such crime to an appropriate law enforcement official as soon as reasonably practicable. Whoever fails to report such crime shall be punished by a fine of not more than one thousand dollars.

269:19 ISSUANCE TO STUDENTS AND STUDENT GROUPS, TEAMS AND ORGANIZATIONS; REPORT
Each institution of secondary education and each public and private institution of post secondary education shall issue to every student group, student team or student organization which is part of such institution or is recognized by the institution or permitted by the institution to use its name or facilities or is known by the institution to exist as an unaffiliated student group, student team, or student organization, a copy of this section and sections seventeen and eighteen; provided, however, that an institution's compliance with this section's requirements that an institution issue copies of this section and sections seventeen and eighteen to unaffiliated student groups, teams, or organizations shall not constitute evidence of the institution's recognition or endorsement of said unaffiliated student groups, teams or organizations.

Each such group, team or organization shall distribute a copy of this section and sections seventeen and eighteen to each of its members, plebes, pledges or applicants for membership. It shall be the duty of each such group, team or organization, acting through its designated officer, to deliver annually, to the institution an attested acknowledgement stating that such group, team or organization has received a copy of this section and said sections seventeen and eighteen, that each of its member, plebes, pledges, or applicants has received a copy of sections seventeen and eighteen, and that such group, team or organization understands and agrees to comply with the provisions of this section and sections seventeen and eighteen.
94. IEP Meeting Participation (34 CFR 300.321)

Pathways Academy Ensures that the IEP Team for Each Student Includes:

- The parents/guardians of the student
- At least one special education teacher of the student and if necessary special education provider of the student
- A representative of the public agency who:
  o Is qualified to provide, or supervise the provision of, specially designed instruction to meet the unique needs of student
  o Is knowledgeable about the general education curriculum
  o Is knowledgeable about the availability of resources of the public agency
- An individual who can interpret the instructional implications of evaluation results, who may be a member of the team described above
- At the discretion of the parent or the agency, other individuals who have knowledge or special expertise regarding the student, including related services personnel as appropriate;
- Whenever appropriate, the student with a disability.

Transition Services Participants

- The public agency must invite a student with a disability to attend the student’s IEP Team meeting if a purpose of the meeting will be the consideration of the postsecondary goals for the student and the transition services needed to assist the student in reaching those goals.
- If the student does not attend the IEP Team meeting, the public agency must take other steps to ensure that the student’s preferences and interests are considered.
- To the extent appropriate, with the consent of the parents or a student who has reached the age of majority, the public agency must invite a representative of any participating agency that is likely to be responsible for providing or paying for transition services.
  o Determination of knowledge and special expertise: the determination of the knowledge or special expertise of any individual described above must be made by the party (parents or public agency) who invited the individual to be a member of the IEP Team.
  o Designating a public agency representative: a public agency may designate a public agency member of the IEP Team to also serve as the agency representative, if the criteria in mentioned above are satisfied.

IEP Team Attendance

A member of the IEP Team described above is not required to attend an IEP Team meeting, in whole or in part, if the parent of a student with a disability and the public agency agree, in writing, that the attendance of the member area of the curriculum or related services is not being modified or discussed in the meeting.

- A member of the IEP Team described above of this section may be excused from attending an IEP Team meeting, in whole or in part, when the meeting involves a modification to or discussion of the member’s area of the curriculum or related services, if—
  o The parent, in writing, and the public agency consent to the excusal; and
  o The member submits, in writing to the parent and the IEP Team, input into the development of the IEP prior to the meeting.
Initial IEP Team Meeting
In the case of a student who was previously served under Part C of the Act, an invitation to the initial IEP Team meeting must, at the request of the parent, be sent to the Part C service coordinator or other representatives of the Part C system to assist with the smooth transition of services. (Authority: 20 U.S.C. 1414(d) (1) (B)–(d) (1) (D))
Bullying Prevention and Intervention (Criterion 20)

Pathways Academy prohibits bullying and retaliation against a person who reports bullying, provides information during an investigation about bullying, and witnesses who have reliable information about bullying as provided in G.L.c. 71, § 37O and has a procedure for receiving reports of bullying or retaliation, promptly responding to, investigating, and addressing all such incidents, and reporting to parents and law enforcement.

- Upon notification of suspected bullying, the Educational Administrator will promptly notify the parent of the alleged target and the alleged aggressor of a report of bullying or retaliation and of the school’s procedures for investigating the report. If the alleged target and alleged aggressor attend different schools, the Educational Administrator receiving the report shall inform the principal of the other student’s school, who shall notify the student’s parent of the report and procedures.

- The Educational Administrator will inform the parent of a target of bullying or retaliation of actions that school officials will take to prevent further acts of bullying or retaliation.

- Pathways Academy will include the requirements and procedures for communicating with the parents of the target and aggressor of bullying or retaliation in the bullying prevention and intervention plan required by M.G.L. c. 71, § 37O.

The Educational Administrator’s notification to a parent about a report of bullying or retaliation must comply with confidentiality requirements of Massachusetts Student Records Regulations, 603 CMR 23.00, and the Federal Family Educational Rights and Privacy Act Regulations, 34 CFR Part 99, as set forth in 603 CMR 49.07, below.

- Upon receipt and review of a report of bullying or retaliation, the Educational Administrator will make a preliminary determination whether to notify the local law enforcement agency of the reported incident.

- The Educational Administrator shall notify the law enforcement agency if the Educational Administrator has a reasonable basis to believe that the incident may result in criminal charges against the alleged aggressor.

- The Educational Administrator shall, consistent with school policy and procedure, consult with the administrative team, and such other individuals the Educational Administrator deems appropriate in making such determination.

- If the Educational Administrator decides to notify the local law enforcement agency, the Educational Administrator shall document the reasons for the decision and immediately contact the local law enforcement agency to discuss the incident and the law enforcement agency’s involvement.

- Nothing in this section shall prevent the Educational Administrator from taking appropriate disciplinary or other action pursuant to school policy and state law.

- If the Educational Administrator decides not to notify the local law enforcement agency, or the local law enforcement agency determines that its involvement is not necessary under the circumstances, the Educational Administrator shall respond to the incident of bullying or retaliation as provided in the bullying prevention and intervention plan.
• If the Educational Administrator subsequently determines facts that cause him or her to believe that the aggressor’s conduct may be criminal, the Educational Administrator shall notify the local law enforcement agency.

• The Educational Administrator shall notify the local law enforcement agency of a report of bullying or retaliation consistent with 603 CMR 49.06(1) if bullying or retaliation occurs on school grounds and involves a former student under the age of 21.

Pathways Academy includes the following requirements and procedures for communicating with the local law enforcement agency in the bullying prevention and intervention plan required by M.G.L. c. 71, § 37O.

• The Educational Administrator may not disclose to a parent any student record information regarding an alleged target or aggressor who is a student and who is not the parent’s child.

• The Educational Administrator may disclose a report of bullying or retaliation to a local law enforcement agency under 603 CMR 49.07(1)(a) without the consent of a student or his/her parent. The Educational Administrator will communicate with law enforcement officials in a manner that protects the privacy of targets, student witnesses, and aggressors to the extent practicable under the circumstances.

• An Educational Administrator may disclose student record information about a target or aggressor to appropriate parties in addition to law enforcement in connection with a health or safety emergency if knowledge of the information is necessary to protect the health or safety of the student or other individuals as provided in 603 CMR 23.07(e) and 34 CFR 99.31(10) and 99.36.

• This provision is limited to instances in which the Educational Administrator has determined there is an immediate and significant threat to the health or safety of the student or other individuals. It is limited to the period of emergency and does not allow for blanket disclosure of student record information.

• The Educational Administrator must document the disclosures and the reasons that the Educational Administrator determined that a health or safety emergency exists.
Bullying Prevention and Intervention Plan

Pathways Academy expects that all members of the school community will treat each other in a civil manner and with respect for differences. Our commitment to providing a safe learning environment includes one that is free from bullying and cyber-bullying. This commitment is an integral part of our comprehensive efforts to promote learning, and to prevent and eliminate all forms of bullying and other harmful and disruptive behavior that can impede the learning process.

Many students who enroll at Pathways Academy have already been the targets of bullying, harassment, or teasing. We will therefore take specific steps to create a safe, supportive environment for our vulnerable population within our school community, and provide all students with the skills, knowledge, and strategies to prevent or respond to bullying, harassment, or teasing.

Pathways Academy does not tolerate any unlawful or disruptive behavior, including any form of bullying, cyber-bullying, or retaliation, in our school buildings, on school grounds, or in school-related activities.

- Pathways Academy’s Policies and Procedures Manual contains all of the relevant sections related to the duties of faculty and staff and the relevant provisions addressing the bullying of students a school staff member.
- Pathways Academy provides parents and guardians annual written notice of the student-related sections of the Plan and information on how to report suspected bullying.
- Pathways Academy provides all staff annual written notice of the student-related sections of the Plan and information on how to report suspected bullying.
- Pathways Academy investigates promptly all reports and complaints of bullying, cyber-bullying, and retaliation, and takes prompt action to end that behavior and restore the target’s sense of safety.
- The Pathways Academy Bullying Prevention and Intervention Plan (“Plan”) is a comprehensive approach to addressing bullying and cyber-bullying, and we are committed to working with students, staff, families, law enforcement agencies, and the community to prevent issues of violence. The Director or designee is responsible for the implementation and oversight of the Plan. Pathways Academy supports this commitment in all aspects of the school community, including curricula, instructional programs, staff development, extracurricular activities, and parent or guardian involvement.

Pathways Academy Bullying Prevention and Intervention Task Force includes but is not limited to the Educational Administrator and the Milieu Manger.

- The Task Force meets at least once annually to develop new or revise current policies and procedures.
- The Milieu Manager, or his or her designee, is responsible for the implementation of said policies. The Task Force is responsible for updating the Plan in print, in the student handbook and the website.
Training and Professional Development
Annual training for all school staff on the Plan will include staff duties under the Plan, an overview of the steps that the Director or designee will follow upon receipt of a report of bullying or retaliation, and an overview of the bullying prevention curricula to be offered at all grades throughout the school. Staff members hired after the start of the school year are required to receive the training during the school year in which they are hired.

Ongoing Professional Development
Pathways Academy will provide professional development on an ongoing basis to all staff. The goal of professional development is to establish a common understanding of tools necessary for staff to create a school climate that promotes safety, civil communication, and respect for differences. Professional development will build the skills of staff members to prevent, identify, and respond to bullying. As required by M.G.L. c. 71, § 37O, the content of school professional development will be informed by research and will include information on:

a) developmentally appropriate strategies to prevent bullying;
b) developmentally appropriate strategies for immediate, effective interventions to stop bullying incidents;
c) Information regarding the complex interaction and power differential that can take place between and among an perpetrator, aggressor, and witness to the bullying.
d) research findings on bullying, including information about specific categories of students who have been shown to be particularly at risk for bullying in the school environment;
e) the incidence and nature of cyber-bullying; and
f) Internet safety issues as they relate to cyber-bullying.

Professional development will also address ways to prevent and respond to bullying or retaliation for students with disabilities that must be considered when developing students’ Individualized Education Programs (IEPs). This will include a particular focus on the needs of students whose disability affects social skills development.

Additional areas identified by the school for professional development include:
a) promoting and modeling the use of respectful language;
b) fostering an understanding of and respect for diversity and difference;
c) building relationships and communicating with families;
d) constructively managing classroom behaviors;
e) using positive behavioral intervention strategies;
f) applying constructive disciplinary practices;
g) teaching students skills including positive communication, anger management, and empathy for others
Definitions
For the purpose of this Plan, aggressor will be used to identify the person(s) who has engaged in the bullying, cyber-bullying or retaliating behavior. Target will be used to represent the person(s) to whom the action is directed. For the purposes of this policy, bullying will include cyber-bullying.

Bullying is defined as repeated use by one or more students or staff members ("staff members" includes, but is not limited to educators, clinicians, administrators, the school nurse, paraprofessional, secretarial and support staff. Pathways Academy does not employ cafeteria workers, custodians, bus drivers, athletic coaches or advisors to extra-curricular activities) of a written, verbal or electronic expression or a physical act or gesture or any combination thereof, directed at a target that:

a) causes physical or emotional harm to the target or damage to the target’s property;
b) places the target in reasonable fear of harm to himself or of damage to his property;
c) creates a hostile environment at school for the target;
d) infringes on the rights of the target at school; or
е) materially and substantially disrupts the education process or the orderly operation of a school.

Cyber-bullying is defined as bullying through the use of technology or any electronic communication, which will include, but will not be limited to, any transfer of signs, signals, writing, images, sounds, data or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photo electronic or photo optical system, including, but not limited to, electronic mail, internet communications, instant messages, text messages or facsimile communications.

Cyber-bullying includes:

a) Creation of web page/blog in which the creator assumes the identity of another person
b) The knowing impersonation of another person as the author of posted content or messages, if the creation or impersonation creates any of the conditions enumerated in clauses (a) to (e), inclusive, of the definition of bullying above.
c) The distribution by electronic means of a communication to more than one person or the posting of material on an electronic medium that may be accessed by one or more persons, if the distribution or posting creates any of the conditions enumerated in clauses (a) to (e), inclusive, of the definition of bullying.

Retaliation and intimidation will not be tolerated and may result in disciplinary action:

- Retaliation against or intimidation of a person who reports bullying;
- Retaliation against or intimidation of a person who provides information during an investigation of bullying;
- Retaliation against or intimidation of a person who has witnessed or has reliable information about bullying.

Other Behaviors which are rude and hurtful but do not meet the criteria to be termed bullying, may not require reporting under the law, but will be addressed as a behavioral infraction.
Bullying is Prohibited:
A. On school grounds. Including property immediately adjacent to school grounds, at a school-sponsored or school-related activity, function or program whether on or off school grounds, at a school bus stop, on a school bus or other vehicle owned, leased or used by a school district or school, or through the use of technology or an electronic device owned, leased or used by a school district or school; and

B. Off school grounds. Including at a location, activity, function or program that is not school-related, or through the use of technology or an electronic device that is not owned, leased or used by a school district or school, if the bullying creates a hostile environment at school for the target, infringes on the rights of the target at school or materially and substantially disrupts the education process or the orderly operation of a school.

Reporting of Suspected Bullying
Pathways Academy Director or designee will ensure safety and support anonymity, if possible, of all involved in reporting, witnessing or interviewing about incidents of bullying. If the school cannot be sure of the safety of all involved, we will then contact the Belmont Police Department per our procedure. All students will be afforded equal protection, regardless of their legal status.

- Anonymous reports of bullying, cyber-bullying or retaliation, or reports by students or parent/guardians who wish to remain anonymous may be submitted to teachers and school administrators and will be investigated. No disciplinary action will be taken based solely on an anonymous report.
- A Reporting Form is available in the main office for use by any party. This form may be submitted directly to the Director or designee or sent anonymously to the Director or designee of the school.
- False Reports submitted knowingly alleging bullying, cyber-bullying, or retaliation will be subject to disciplinary action, possibly including community service, meetings with parents/guardians and school personnel, suspension or other appropriate consequences.

Staff Members
All Staff Members (i.e. anyone employed by Pathways Academy) will report immediately to the Director or designee when he/she witnesses or becomes aware of conduct that may be bullying or retaliation.

- The requirement to report to the Director or designee does not limit the authority of the staff member to respond to behavioral or disciplinary incidents consistent with school policies and procedures for behavior management and discipline.
- This requirement includes, but is not limited to, an educator, administrator, school nurse, clinician, support staff member or per diem staff.
- In the event that the Director or their designee is the alleged aggressor, reports should be made to the Educational Administrator.
- School volunteers will report immediately to the Director or designee any conduct that may be bullying, cyber-bullying, retaliation, or intimidation when s/he has witnessed it or becomes aware of it. They will be notified of and trained in the reporting requirement.
Parents/Guardians
Parents/guardians and others who witness or become aware of an instance of bullying or retaliation involving a student are to report it to the Director or designee.

- Reports may be made anonymously, but no disciplinary action will be taken against an alleged aggressor solely on the basis of an anonymous report.
- Parents or guardians, and others may request assistance from a staff member to complete a written report.
- This report to the Director or designee is best if done in direct conversation but may also be done by email, phone message, or other written communication.

Students
Students who believe they have been subjected to bullying, cyber-bullying, or retaliation, or who witness or become aware of an instance of bullying or retaliation involving a student are to report it to the Director or designee.

- This report may also be made to the student’s teacher, counselor, or any adult staff member.
- Students will be provided practical, safe, private and age-appropriate ways to report and discuss an incident of bullying with the Director or designee, or with a staff member.
- This report is best if done in direct conversation with the staff member, but may also be done by other means or through the student’s parent/guardian. The report may also be submitted anonymously.

Investigating and Responding to Reports
Upon receipt of a report of possible bullying, cyber-bullying, retaliation, or intimidation, the Director or designee will, before fully investigating the allegations of bullying or retaliation, take steps to assess the need to restore a sense of safety to the alleged target and/or to protect the alleged target from possible further incidents.

- Responses to promote safety may include, but not be limited to, creating a personal safety plan; pre-determining seating arrangements for the target and/or the aggressor in the classroom, at lunch, or on the bus; identifying a staff member who will act as a “safe person” for the target; and altering the aggressor’s schedule and access to the target. If all of these measures do not restore safety to the target, an emergency team meeting will be called to discuss placement. The Director or designee will take additional steps to promote safety during the course of and after the investigation, as necessary.
- In conducting an investigation, the Director or designee, will consider how the bullying behavior might impact the general learning environment of the school or the impact it may have on bystanders or other students in the school. Consequences may be necessary even if the target indicates the aggressor(s) behavior is permissible.
- The Director or designee will promptly conduct an investigation. During the investigation the Director or designee will, among other things, interview students, staff, witnesses, parents or guardians, and others as necessary.
- Director or designee (or whoever is conducting the investigation) will remind alleged aggressor, target, and witnesses that retaliation is strictly prohibited and will result in disciplinary action.
• The Director or designee is required to investigate all reports of potential acts of bullying or cyber-bullying. This obligation exists regardless of requests from reporters to not investigate or talk with certain students or individuals. We encourage reporting, but reporting on the condition that no action will be taken or limits placed on the investigation cannot be accepted.

Steps of Investigation:
   a) Report is received;
   b) Interview the target and assess the level of threat present;
   c) Interview reporter, if other than target, and note and interview other witnesses (especially adults) or any online involvement;
   d) Interview the alleged aggressor(s);
   e) Determine the merit and plausibility of the report; and
   f) Determine the circumstances and establish disciplinary or other consequences, if necessary.

Consequences and Response to Bullying
If the Director or designee determines that bullying, retaliation, or intimidation has occurred and consequences are merited, the Director or designee will

1. Promptly notify the parents or guardians of the target and the aggressor about the results of the investigation and what action is being taken to prevent further acts of bullying or retaliation.
   • All notices to parents must comply with applicable state and federal privacy laws and regulations. Because of the legal requirements regarding the confidentiality of student records, the Director or designee cannot report specific information to the target’s parent or guardian about the disciplinary action taken unless it involves a “stay away” order or other directive that the target must be aware of in order to report violations.

2. Take appropriate disciplinary action; and

3. Notify the local law enforcement agency if she/he has a reasonable basis to believe that the incident may result in criminal charges against the alleged aggressor.
   • If the local law enforcement is notified, the Director or designee shall document the reasons for the decision.
   • If the local law enforcement agency is not notified or if it determines that its involvement is not necessary, the Director or designee shall respond to the behavior as is appropriate within the Pathways Academy Policies and Procedure Manual.
   • A Memorandum of Understanding between Pathways Academy, Belmont Police Dep’t and Middlesex County Prosecutor’s Office exists that outlines the nature of this reporting.
   • If an incident of bullying, retaliation, or intimidation involves students from more than one school, the Director or designee will promptly notify the appropriate administrator of the other school or school district so that both may take appropriate action.
Consequences and Support Services

Bullying behavior can take many forms and can vary dramatically in its seriousness and its impact on the target and other students. Accordingly, there is no one prescribed response to verified acts of bullying and retaliation. Consequences and disciplinary action will be applied in accordance with the Pathways Academy Policies and Procedures Manual.

- The responses will range from redirection of future behavior to suspension and possible expulsion from school for students.
- For staff members, the responses will range from verbal warning, to suspension, and possible termination of employment. These actions will escalate in severity for repeated offenses or with the severity of the implication of the negative conduct.
- Actions may be accompanied by referral to additional counseling or other therapeutic support for all aggressors and their families. Specific action will be age appropriate, concrete, and immediate.
- The nature and extent of disciplinary action imposed or consequences applied, is a matter within the sound discretion of the Director or designee. The Director or designee will balance the need for accountability and safety with the need to teach appropriate behavior to maintain a positive and supportive educational environment.
- Consequences and discipline for acts of retaliation will be imposed at the same, or more severe, level as the underlying bullying, cyber-bullying or inappropriate behaviors.
- Students, or staff members who are not primary participants in the reported act of bullying, cyber-bullying, or retaliation but join in, may be subject to disciplinary action or consequences as if they were primarily involved. “Joining-in” is a form of endorsing the behavior.
- Consequences or disciplinary actions taken in an instance of bullying will be shared with the appropriate school staff members, and McLean Hospital administrators to ensure awareness and follow through.

When it is determined that a target is in fear or is being threatened, the Director or designee will develop a safety plan to immediately take steps to limit and control the behavior of aggressor(s) who are causing the threat.

- The safety plan will be developed in collaboration with the appropriate staff and administrators and shared with staff to ensure enforcement and follow-up.
- The procedure for restoring target safety could include, but not be limited to, creating a personal safety plan; pre-determining seating arrangements for the target and/or aggressor in the classroom, at lunch, or on the bus; identifying a staff member who will act as a “safe person” for the target; altering the aggressor’s schedule and access to the target; and supervised mediation.
- Referral to additional counseling and other therapeutic supports will be considered for all targets and their families.
- If all of these measures do not restore safety to the target, an emergency team meeting will be called to discuss placement.
The Director or designee will periodically follow-up with the target(s) and their parents, as well as his/her school clinician to ensure the student believes the situation has improved and that any threat or fear has been significantly reduced or eliminated. Those found to be the aggressor or target are provided continued Bullying Prevention and Intervention education.

**Parent and Student Education of the Plan: Education and Resources**

Pathways Academy offers education programs for parents and guardians that are focused on the parental components of the bullying prevention and intervention curricula.

**Notification Requirements.**

Each year Pathways Academy will inform parents/guardians of enrolled students about the bullying prevention and intervention curricula that are being used.

- Notice includes information about dynamics of bullying, including cyber-bullying/online safety.
- The school will send parents written notice each year about the student-related sections of the Plan and the school's Internet safety policy.
- All notices and information made available to parents or guardians will be in hard copy and electronic formats, and will be available in the language(s) most prevalent among parents or guardians. Pathways Academy posts the Plan and related information on its website.
- The Educational Administrator or designee will inform the parent or guardian of the target about the Department of Elementary and Secondary Education’s problem resolution system and the process for accessing that system, regardless of the outcome of the bullying determination.
- Any parent wishing to file a claim/concern or seeking assistance outside of the district may do so with the Department of Elementary and Secondary Education Program Resolution System (PRS). That information can be found at: http://www.doe.mass.edu/pqa, emails can be sent to compliance@doe.mass.edu or individuals can call 781-338-3700. Hard copies of this information are also available in the Pathways Academy main office.

**Curriculum and Instruction**

Pathways Academy’s Bullying Intervention and Prevention curriculum is designed to help parents and others understand the school’s bullying prevention efforts. Pathways Academy provides age-appropriate instruction on bullying prevention as evidenced in their Pragmatic curriculum. The curriculum is evidence-based and based on information provided by the Massachusetts Aggression Reduction Center (M.A.R.C.). Bullying prevention curricula will be informed by current research which, among other things, emphasizes the following:

a) using scripts and role plays to develop skills;
b) empowering students to take action by knowing what to do when they witness other students engaged in acts of bullying or retaliation, including seeking adult assistance;
c) helping students understand the dynamics of bullying and cyber-bullying, including the underlying power imbalance;
d) emphasizing cyber safety, including safe and appropriate use of electronic communication technologies;
e) enhancing students’ skills for engaging in healthy relationships and respectful communications;
f) engaging students in a safe, supportive school environment that is respectful of diversity and difference.
g) engaging students in school or classroom planning and decision-making; and maintaining a safe and caring classroom for all students.

Teaching Students about Student-Related Sections of Bullying Prevention/Intervention Plan
The following approaches are integral to establishing a safe and supportive school environment. These underscore the importance of our bullying intervention and prevention initiatives:

a) setting clear expectations for students and establishing school and classroom routines;
b) creating safe school and classroom environments for all students, including for students who are lesbian, gay, bisexual, transgender students, and students who are homeless;
c) using appropriate/positive responses/reinforcement, even when students require discipline;
d) using positive behavioral supports;
e) encouraging adults to develop positive relationships with students;
f) modeling, teaching, and rewarding pro-social, healthy, and respectful behaviors;
g) using positive approaches to behavioral health, incl. collaborative problem-solving, conflict resolution training, teamwork, positive behavioral supports that aid social-emotional development;
h) using the Internet safely; and
i) supporting students’ interest and participation in non-academic and extracurricular activities, particularly in their areas of strength.

Application to Students on IEPs
As required by M.G.L. c. 71B, § 3, as amended by Chapter 92 of the Acts of 2010, when the IEP Team determines the student has a disability that affects social skills development or that the student may participate in, or is vulnerable to, bullying, harassment, or teasing because of his/her disability, the Team will consider what should be included in the IEP to develop the student's skills and proficiencies to avoid and respond to bullying, harassment, or teasing. This will include a particular focus on the needs of students whose disability affects social skills development.

Pathways Academy recognizes that certain students may be more vulnerable to become targets of bullying, harassment, or teasing based on actual or perceived characteristics, including race, color, religion, ancestry, national origin, sex, socioeconomic status, homelessness, academic status, gender identity or expression, physical appearance, or sensory, disability, or by association with a person who has or is perceived to have one or more of these characteristics.

- In an effort to create a safe, supportive environment for vulnerable populations in our school community, and provide all students with the skills, knowledge, and strategies to prevent or respond to bullying, harassment, or teasing Pathways Academy addresses the topic of Bullying in Pragmatics class for the students and a yearly in-service for the staff.
- Within the school milieu Pathways Academy staffs actively address each episode of taunting and/or bullying in real time to educate all parties involved and respond in an expeditious manner.
Data Collection and Reporting
In order to monitor the success of the Plan, reports of Bullying are reviewed and analyzed on an annual basis for trends including but not limited to the number of reported allegations, the number of substantiated incidences, and the number of students disciplined for engaging in, bullying and or retaliation.

- At least once every four years beginning with 2015/16 school year, the Pathways Academy Bullying Prevention and Intervention Task Force will administer a Department of Elementary and Secondary Education developed student survey to assess school climate and the prevalence, nature, and severity of bullying in our schools.
- Additionally, Pathways Academy will annually report bullying incident data to the Department.
- Similar tools to the student survey will be used with faculty, staff, and parents/guardians to assist in determining school climate needs.
- Pathways Academy maintains incident reports, including those of alleged events of bullying, in individual student binders.
96. Lice (Criterion A)

Parents/guardians of Pathways Academy students who are found to have head or other lice and/or nits will be contacted by the school nurse who will provide them with information on lice.
97. Snow Policy (Criterion B)

Pathways Academy follows the school closings of Belmont Public Schools:

- **Closure**: Pathways Academy is closed if Belmont Public Schools are closed.
- **Delay**: In the event that Belmont Public Schools have a delayed opening, Pathways Academy will have the same delayed opening.
- **Information**: School closure information can be found on the television, the radio and the internet.

In the rare event that Pathways Academy closes early or is closed and Belmont Public Schools are not closed, parents and guardians will be contacted directly.
98. Absent & Late Arrival (Criterion C)

In the event that a student is going to be absent or late, their parent or guardian should call the main office (617-855-2847) as soon as possible.

- The event that a student is dropped off late at school, their parent or guardian should walk the student into Pathways Academy and sign them in.
- In the event of a prolonged absence (3 or more days), the parent or guardian is required to provide Pathways Academy with a doctor’s note stating that the student has been cleared to return to school.
- As per Pathways Academy’s contract with the sending School district, Pathways Academy is required to notify the sending school district of a student’s attendance which includes any extended absences.
99. Field Trips (Criterion D)

Pathways Academy offers monthly pragmatic outings into the community in an effort to provide students with opportunities to practice social pragmatics skills outside of the school milieu.
100. Internet Use (Criterion E)

Pathways Academy students may access the internet under direct teacher supervision for educational purposes. It is up to the discretion of Pathways Academy staff to determine what constitutes the scope of educational purposes. Pathways Academy staff may deem it necessary to limit or revoke student access.
101. Cell Phone Use (Criterion F)

Pathways Academy students are prohibited from using cell phones during the school day, except in the case of use as a non-internet handheld gaming device. Pathways Academy staff may deem it necessary to limit or revoke use of a student’s cell phone. Pathways Academy staff will make a land line available for supervised calls home if necessary.
102. Emergency Contacts (Criterion G)

In the event that Pathways Academy is unable to reach a parent and/or guardian of an enrolled student for reasons including, but not limited to, illness, suspension and inclement weather, Pathways Academy will utilize the emergency contact information furnished by the parent and/or guardian.

- Pathways Academy requires that parent/guardians annually provide 2 emergency contacts, with different telephone numbers, who are not the parent or the guardian.
- Pathways Academy urges parents and/or guardian to make their emergency contacts aware of their role and responsibilities as emergency contact.
103. Sick Policy (Criterion H)

Pathways Academy requires that students be kept home/ sent home from school for the following, but not limited to, illnesses/symptoms:

- A cold in the contagious stage (first few days).
- Undiagnosed rash or skin eruptions.
- Earache, red eyes or drainage from eyes.
- Fever of 100 degrees F or higher in the past 24 hours. A student must have a temperature below 100 degrees F a full 24 hours without taking a fever reducing medicine before re-entry into school.
- Vomiting or diarrhea within the past 24 hours. A student must be kept home a full 24 hours post last episode of vomiting or diarrhea before re-entry into school. If a student has an allergy or a condition which regularly causes stool to be characteristic of diarrhea in its consistency, please alert School Nursing.
- Any communicable diseases. Examples are chicken pox, strep throat, scarlet fever, conjunctivitis, ear infection, or fifth disease. Please notify School Nursing in the event of such illness.

In some cases of contagious illness, such as conjunctivitis and strep throat, a child may re-enter school before their is temperature is below 100 degrees F without fever reducing medicine, per comfort/stamina level and after a full 24 hours of antibiotic therapy has been initiated.

This list is a guideline and is not all-inclusive. Pathways Academy School Nursing reserves the right to dismiss students, in nursing professional opinion, that are contagious or too ill to be in school.
104. Annual Consent Forms and Required Information (Criterion I)

Pathways Academy requires that all enrolled students provide a completed Student Information and Consent Packet before starting the school year.

The complete Annual Student Information and Consent packet includes, but is not limited to: student information, parent contact information, emergency contact information, insurance contact information, transportation company contact information, diagnoses and allergies, medications administered at home and/or school, previous psychiatric hospitalizations, permission to provide emergency first aid and/or medical treatment, acknowledgement of restraint policy, consent for photography/audio taping/ videotaping, consent for observation and research, consent to attend field trips and ride in McLean Hospital vehicles, consent (or non-consent) for human sexuality education, consent for participation in the McLean Hospital Fitness and Recreation Center.

Students who do not provide a completed packet annually are not eligible to attend Pathways Academy.
105. Student Dress Code (Criterion J)

Pathways Academy students are expected to dress appropriately including, but not limited to, refraining from any offensive language, pictures or messages on clothing. Students are expected to refrain from wearing revealing clothing. Students’ clothing should be free from bodily fluids.

- Pathways Academy reserves the right to require closed toe footwear, such as sneakers or shoes, at such times as, but not limited to, the fitness center, physical activity class and while using the play structure.
- In the event that Pathways Academy staff deems a student’s attire to be inappropriate for school, the student will be directed to turn the article of clothing inside out or choose an alternative article of clothing (from Pathways Academy’s clothing bank or from home).
- In the event that the student does not comply with staff directives, the student’s parent/guardian will be contacted and the student will be sent home from school.
106. Search and Seizure of Students’ Belongings (Criterion K)

Pathways Academy staff may search a student and/or their belongings, including, but not limited to outerwear and bags, if Pathways Academy has reasonable cause to believe that the search is necessary to maintain a safe school environment. Pathways Academy staff may seize any and all items believed to pose a safety concern and/or deemed inappropriate. If a student refuses to permit a staff member to search them and/or their property, security will be called immediately.
107. Classroom Composition (Criterion L)

Pathways Academy works hard to group students together according to a wide variety of factors. Pathways Academy reserves the right to determine the composition of student classrooms within DESE guidelines. Pathways Academy also reserves the right to make changes to classrooms as needed. While Pathways Academy will take feedback into consideration, due to the complicated nature of instructional grouping, the school is unable to guarantee student and/or parent preferences.
108. Weapons Policy (Criterion M)

Pathways Academy prohibits the carrying and use of weapons of any kind, including, but not limited to firearms, knives and projectiles within school buildings, facilities, grounds, or on school vehicles by any individual, including school personnel.
109. Personal Items (Criterion N)

Pathways Academy permits students to bring in and use personal items for use during appropriate times throughout the school day. Such items may include, but are not limited to, clothing, hand held gaming devices, MP3 players, tablets, books and cards. These items are the sole responsibility of the student. Pathways Academy is not responsible for the replacement or repair of such items. Pathways Academy staff may deem it necessary to limit or revoke use of such items.

Pathways Academy does not permit students to play games that are rated higher than T (teen), that includes, but is not limited to M (Mature), AO (Adult Only) and RP (Rating Pending). Pathways Academy reserves the right to prohibit students from playing any game that they deem inappropriate.
110. Injury Prevention Plan (Criterion O)

Each classroom, common area, bathroom, and outdoor area is monitored daily by the teaching and clinical staff to remove or repair any piece of equipment which may be broken, have rough edges, or otherwise have potential for causing injury.
111. Prevention and Control of Infectious Diseases (Criterion P)

If a student is determined by Pathways Academy to be unable to participate in school because of a health related issue; e.g., onset of cold, intestinal flu, etc., he/she will be sent home after a call to his/her parent/guardian, notifying the need to pick up the student. The school does not have the staff nor the facilities to accommodate daily care of ill children except for short-term care awaiting parent/guardian pick up.

Should a student develop a gastrointestinal illness (diarrhea, vomiting), a respiratory illness (severe cold with fever, flu) or skin rash or other direct contact infection, the student will be isolated and cared for by the school nurse or designee. A call will be made to the student’s parent/guardian to arrange to have the student taken home as soon as possible.

Guidelines for when to keep a child home from school are sent to each parent yearly in the annual consent and information packet. These guidelines include, but are not limited to, gastrointestinal illness, respiratory illness, skin rash or other direct contact infection. Should a student develop a communicable disease, or any other condition of public health concern, parents will be notified by individual letters. Letters will state symptoms to look for, course and usual treatment of the illness and exclusionary policies.

Resources for information about infectious diseases, infection control, and the school’s exclusionary practices include:

- Massachusetts Comprehensive School Health Manual, a Publication of the Department of Public Health.
- Paula Bolton, McLean Hospital's Infection Control Nurse, Telephone (617) 855-3258 or (508) 685-9966.
112. Infection Control Procedures (Criterion Q)

Staff and students will wash their hands with soap and water and will dry with disposable towels before eating or handling food, after using the bathroom, after coming into direct contact with bodily fluids and after cleaning.

Disposable gloves will be worn when in contact with blood or other bodily fluids. A red biohazard trash can with a red biohazard trash bag is located in the nurse’s medication room for disposal of gloves and other trash as a result of caring for a situation that involved contact with blood or other bodily fluids.

Staff members are responsible for infection control measures in their rooms with the exception of routine maintenance that is done by custodial staff. Surfaces and equipment will be cleaned and disinfected according to the schedule that follows:

- After each use: tables used for meals and snacks, food preparation areas, dishes and non-disposable eating utensils
- Weekly and as needed: refrigerator
113. Student Hygiene (Criterion R)

Clothing
Pathways Academy ensures that students’ clothing is adequate and appropriate to meet the students’ social and health needs. In the event that a student repeatedly comes to school in clothing that is not adequate or appropriate for their comfort or safety, Pathways Academy will make provisions to rectify the situation by talking with the parent/guardian and/or state agencies to ensure that they are provided with clothing that is adequate and appropriate. Pathways Academy keeps a small supply of clean extra clothing for distribution to students whose clothing is inappropriate for school use. Students’ clothing should be free from bodily fluids.

Grooming and Hygiene
Pathways Academy ensures that students’ grooming and hygiene is adequate to meet their health and social wellness. In the event that a student is noticed to be not meeting basic standards for cleanliness, a staff member will privately speak with the student to address this concern. Should resources not be available to the student in their home to meet this need, the school nurse or family liaison will make provisions to address this by either encouraging parent(s) to seek state resources or facilitating this process by initiating a referral to the appropriate agency.
114. Social Media Policy (Criterion S)

**Staff Personal Use**
Pathways Academy employees are expected to use good judgment in personal social media activities. Even private postings on social media sites may constitute a public communication.

Staff members are required to follow Partners Healthcare’s standards for confidentiality, truthfulness, and respect for others. If a staff member identifies oneself as a Pathways Academy and/or Partners employee, posts about Pathways Academy and/or Partners, or refers to the work of Pathways Academy and/or Partners, or a Partners entity, that communication is governed by all applicable Partners policies. Sites that present an official page of Partners or a Partners program, entity, or initiative must receive approval prior to going live (i.e. www.cnspathwaysacademy.org).

**Students**
Use of social media sites or applications by students during the school day is prohibited.
115. Open Meeting Policy (Criterion T)

Pathways Academy parent meetings and events, including, but not limited to Coffee Hour, Parent Advisory Group and the End of the Year Ceremony, are public venues and thus any information shared in such meetings is not shared in confidence and thus may be repeated by other attendees.
116. Student Driving (Criterion U)

Given parental consent, students with a driver’s license may drive themselves to Pathways Academy. Students who do drive to school may not access their car during the school day unless accompanied by a school staff. As with any change in transportation, in the event that a student is going to drive to school, the student’s parent or guardian must notify Pathways Academy of the students intent to drive him/her self to school.

Parents or guardians must notify Pathways Academy of the make and model of the vehicle that is to be driven. Pathways Academy staff members will identify appropriate parking spaces for the student. Students will not be permitted to leave school before the end of the school day unless Pathways Academy has received written permission from the student’s parent or guardian to do so.
117. Gift to Staff (Criterion V)

In accordance with McLean Hospital policy, Pathways Academy staff may accept gifts from students and/or their families that are nonmonetary and the value of the gift does not exceed $200.
118. Visitors (Criterion W)

Members of the community at large that have permission to visit Pathways Academy includes, but is not limited to, representatives of school districts, advocates, clinicians, and candidates for admission and their parents and/or guardians. Visitors will be allowed in after signing the Visitor Confidentiality Agreement.

The Visitor Confidentiality Agreement (VCA) states:

I understand that, in the course of my time at Pathways Academy (PA), I may become aware of confidential information about specific students, which may include, but is not limited to such information as students' placement, academic performance, behavior, health, disabilities and related matters. I understand and agree that I will not disclose such confidential information except to school employees who have a need to know.

I have read, understand, and agree to the information presented above.

The VCA requires the visitor to print their name, sign their name and date the document. The VCA requires the name of the Pathways Academy staff member that is their point of contact. Completed VCAs are kept in a binder in the main office.