

Report to the Legislature: Study of the Cost of Implementing the Student Discipline Law

November 2013

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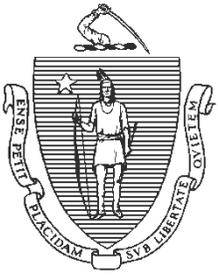
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Dear Members of the General Court:

I am pleased to submit this report to the legislature, *Study of the Cost of Implementing the Student Discipline Law*, pursuant to the Acts of 2012, Chapter 222, Section 11.

In August 2012, the Legislature passed and Governor Patrick signed into law An Act Relative to Student Access to Educational Services and Exclusion From School. This act created new requirements for school districts regarding how they serve students suspended and expelled from school, as well as for the state in providing resources to districts to serve those students. These requirements go into effect on July 1, 2014.

The Act also required that the state issue a report on the costs of implementing the act no later than November 30, 2013. The Department of Elementary and Secondary Education contracted with the Rennie Center for Education Research & Policy, Inc. and Evidence-Based Education Research & Evaluation, LLC, to conduct this study.

Usually, cost studies estimate the marginal (additional) cost of a program by comparing the costs incurred before and after implementation in serving the population of interest. In this case, because districts are not yet required to implement the law, the report instead estimates the actual cost of providing an educational program that meets the requirements of the law.

To reflect the fact that districts have many options for providing the required educational services to suspended and expelled students, the report examines three separate qualifying program models: an online learning laboratory in North Adams, a tutoring program in Fall River, and an alternative education model in Springfield. The researchers looked only at the cost of serving suspended or expelled students who are not eligible for special education services, as special education students are already required to receive education services through age 21 under federal law and thus are not affected by the new state requirements.

Key findings include:

- The estimated total annual cost of an instructional program meeting the law's requirements ranged from \$32,130 to \$308,131, depending on the program model. This works out to an estimated \$1,890 to \$8,559 per pupil. The per pupil figures should be considered approximations, since programs could potentially absorb more or fewer pupils into the program while maintaining a similar total cost and since in one case the researchers had to estimate the total number of pupils served.

- Program models ranged in intensity from a few hours per week to a full-day program and served different numbers of students, explaining much of the variation in costs across models. In all cases the primary cost driver was personnel.
- The estimates included only costs for academic and instructional services. Many programs also provided other services to students, such as social or emotional supports or graduation coaching. Because these services were not academic in nature (hence not part of the new requirement to provide educational services to suspended and expelled students) and were provided differentially based on individual students' needs, they were not considered part of the academic program.
- The three districts profiled already had met most of the other new requirements of the law, such as parental notification and data collection. Districts that do not have existing policies that meet the law's requirements might incur additional costs not observed in the study sample. However, these costs are likely to be low for most districts, as we expect that in most cases, existing policies and activities can be adapted to include the new requirements.

The law also requires the state to develop new regulations for key aspects of the new law, collect and report data on suspension and expulsions, publish a model protocol for conducting exit interviews with students who intend to drop out, compile a list of research and information about the consequences of dropping out and community resources to keep students in school, and write two reports related to the costs of the program.

The Rennie Center report estimates that these new state requirements generated a one-time up-front cost to the state of \$116,081 and annual recurring costs of \$2,326. However, much of the cost at the state level remains to be determined, particularly for the annual recurring costs, since the state has yet to determine how much effort will be required to keep the new systems running once established.

I hope you find this report useful. Please feel free to contact me or Associate Commissioner John Bynoe (jbynoe@doe.mass.edu, 781-338-6300) if you have any questions.

Sincerely yours,

Mitchell D. Chester, Ed.D.
Commissioner of Elementary and Secondary Education

Overview

In 2012, the Commonwealth of Massachusetts enacted a new Law, “An Act Relative to Student Access to Educational Services and Exclusion from School” (Chapter 222, of the Acts of 2011; or “Law”). This Law places new requirements on the Department of Elementary and Secondary Education (ESE) and school districts to ensure that students who are expelled or suspended for more than 10 days from school – referred to as suspended or expelled students below – have opportunities to make academic progress while they are out of school. Additionally, districts and ESE are charged with additional administrative responsibilities including: due process provisions for students; data tracking and reporting of discipline data; a pupil absence notification program; and processes and protocols for students permanently leaving school. These new Chapter 222 requirements take effect on July 1, 2014.

Chapter 222 also requires that ESE issue a report (no later than November 30, 2013) that describes the costs that may be incurred by ESE and school districts in implementing the Law. In response to that component of the legislation, ESE contracted with the Rennie Center for Education Research & Policy (Rennie Center) and Evidence-Based Education Research & Evaluation, LLC (EBERE) to conduct an implementation and resource cost study. In addition, the report describes district and ESE responses to Chapter 222 legislation to date, and identifies the resources and corresponding costs associated with implementation. The study was designed to present education policymakers and practitioners with a detailed look at the manner in which three districts are currently providing academic services to suspended or expelled students, ahead of required implementation.

The study was guided by the following research questions:

1. What programmatic options do school districts utilize to provide academic support to students who have been expelled or suspended? What are the key characteristics of these program models?
2. What resources are required to implement these programmatic options?
3. What does it cost to implement these programmatic options, and who bears these costs?
4. What additional non-service related costs are incurred by the state and school districts to comply with the Law?

Study methods

Massachusetts school districts rely on a broad range of programs and resources to support students who cannot attend school for extended periods of time due to disciplinary incidence. To address the research questions, researchers first identified existing programs serving suspended or expelled students, and then worked with ESE to select three program options that met Chapter 222 requirements for case studies. These programs included:

- Fall River’s *3-to-5 Program*, an on-campus tutoring program for students who cannot attend school for an extended period of time (e.g., long-term suspended students, students on medical leave, etc.) occurring after-school hours at Durfee High School;
- Springfield’s *external interim alternative education setting (IAES) program* located at a district-site separate from the high school and typically serving the districts’ suspended population that has been excluded from school (e.g., suspended for 30 days or more); and
- North Adams’ online learning model in which suspended students can access the Drury High School *Online Learning Lab*.

Four different types of data were collected for this study: (1) program characteristics and resources for each of the selected district program options; (2) district-based cost data associated with each of the program options; (3) district administrative status in responding to Chapter 222 requirements; and (4) state level costs associated with implementing the administrative requirements by ESE. District data was drawn from case studies of the three selected programs; state data relied on in-depth interviews with ESE personnel. The study team constructed detailed program and resource profiles, and identified all costs associated with these program resources.

As discussed above, the goal of this study is to document characteristics of districts’ current program options serving suspended and expelled students, and estimate the cost of selected programs. There are, however, inherent limitations with the approach selected to do so. Discussed below are a few of the analytic challenges in deriving the costs to districts and ESE of new legislative provisions a year ahead of required implementation:

- This study provides a snapshot of selected program options that districts had in place to serve suspended and expelled students during the 2012-13 school year, and not those developed in order to meet Chapter 222 requirements. Districts may continue to make modifications to profiled program options, or may make wholesale changes to current academic offerings to further align with required provisions; future district-level changes can limit the relevancy of the findings of this study.
- Because selected districts already had program options in place, the study team was unable to calculate the additional (marginal) costs of developing these options. In addition, districts were only in process of meeting some administrative requirements of the Law; therefore, the study team was unable to calculate the full cost of district implementation. Thus, the cost estimates at the district level reflect the cost of existing programs, but do not reflect the total costs of meeting Chapter 222 requirements.
- In the course of conducting this study, the study team has learned that district program options are largely built in response to specific student needs. These factors make it difficult to generalize across sites, and even more challenging to derive cost estimates given the standardization process that is required to do so.

Study findings

The study focused on four categories of findings: existing district program options for academic services for suspended or expelled students; costs related to these existing academic program options; district implementation of Chapter 222 requirements; and state implementation of Chapter 222 requirements.

District options for academic service provision: program characteristics

The study team identified and selected three districts for this study which utilized different program options to serve suspended and expelled students. There was wide variation in the specific approaches districts used to provide academic services to suspended and expelled students; however, some common themes in program characteristics emerged.

- *Districts are drawing lessons on how to meet student needs from programming designed for special education students.* Districts are modifying existing special education services and programs to meet the needs of general education students who are suspended and expelled from school.
- *Districts employ highly individualized approaches for how to serve suspended and expelled students.* District administrators reported customizing established program options to ensure a match between the academic services offered to suspended or expelled students and student need.
- *All three districts selected for this study have centralized approaches to student support services, including data tracking systems.* These districts have developed a strong centralized function dedicated to implementing a flexible array of support services for struggling students.

District options for academic service provision: program costs

As noted above, the approach adopted in this study was to identify resources required as part of the program options used by selected districts to provide academic services to suspended or expelled students. The resulting cost estimates represent the value of these resources. For districts interested in adopting similar program options, estimates provide detail on the resources used and associated costs.

- *Districts' program options vary in the academic services they offer students.* Academic counseling and planning for suspended students is provided in two of the districts, and vary in terms of specific offerings to students.
- *Increased student contact hours have an impact on program resources.* A primary contributing factor to per pupil costs is the number of hours students participate in program options; programs engaging students for a full school day have higher per pupil costs than programs engaging students for only a few hours per day.
- *Decisions on program staff represent a key factor in program cost.* A key element of program cost is staff time. Personnel costs vary in the variety, and number, of instructional staff providing program support.

District implementation of new Chapter 222 requirements

Chapter 222 introduced new procedural and reporting requirements affecting districts, schools, and students. In the three study districts, researchers collected data on the district response to the administrative aspects of Chapter 222 legislation, (e.g., requirements other than academic service provision to suspended and expelled students). District activity ranged from meeting some new requirements, to not having begun to plan a response. Common trends in district response to the Law are below.

- *Districts are meeting new Chapter 222 requirements, prior to enactment of the Law.* Sites selected for this study are already meeting new discipline policy requirements in regards to a pupil notification program and a process governing whether students have formally left school.
- *Where districts are not yet meeting new Chapter 222 requirements, they have not yet developed plans for new policies or protocols that would meet legislative requirements.* Reflective of the Chapter 222 implementation deadline, the three districts in this study are not yet fully meeting all new discipline policy requirements.

State implementation of new Chapter 222 requirements

Chapter 222 introduces new procedural and reporting requirements for ESE in four areas: (1) data collection and reporting; (2) regulations for principals/headmasters; (3) resources, including information for students who intend to drop out of school; and (4) cost reporting. Interviews with ESE staff responsible for addressing these areas indicate that the department has made substantial progress towards implementation of the new requirements across all areas.

- *ESE will soon meet both data collection and reporting requirements stipulated by Chapter 222 requirements.* Prior to the passage of Chapter 222, ESE made changes to an existing district data collections on disciplinary actions to streamline the process districts utilized to report on discipline data. Reports drawing on this data collection are currently being developed and will align with requirements of Chapter 222 to the extent feasible.
- *ESE is focusing on the development of new regulations for principals, and protocols to use with at-risk students.* A working group of ESE staff are actively developing regulations and protocols for completion by spring 2014.
- *The status of additional cost reporting requirements is unclear.* Reflective of the Chapter 222 implementation timeline, ESE has not yet assigned staff to an annual report on instructional costs associated with providing alternative educational services.

Conclusion

Conducted by Rennie Center and EBERE to meet requirements of Chapter 222 legislation, this report on the costs to implement Chapter 222 requirements can be illustrative to other districts as they plan for their response to the legislation. Specifically, the report details costs of three different program options districts are currently utilizing to provide academic services to suspended and expelled students, in an effort to support district-level decision-making on program development to meet Chapter 222 requirements. The report also highlights the extent to which districts, and ESE, are planning responses to new legislative requirements, and the costs associated with resources needed to support these responses.



Cost Study of Massachusetts Chapter 222: “An Act Relative to Student Access to Educational Services and Exclusion from School”

*Final Report Submitted to Massachusetts Department of Elementary and Secondary Education
October 9, 2013*

Overview

In 2012, the Commonwealth of Massachusetts enacted a new law, “An Act Relative to Student Access to Educational Services and Exclusion from School” (Chapter 222; or “Law”). Chapter 222 places new requirements on the Department of Elementary and Secondary Education (ESE) and school districts to ensure that students who are expelled or suspended for more than 10 days from school – referred to as suspended or expelled students throughout the course of the report - have opportunities to make academic progress while they are out of school. In doing so, Chapter 222 calls upon school districts to not only keep track of and report to the state on these types of disciplinary actions, it also requires them to establish and maintain strategies to provide appropriate educational interventions and supports to students who are suspended or expelled from school due to disciplinary incidents. Additionally, ESE is charged with the responsibility of disseminating information to districts about potential models and strategies they might use as intermediary steps, prior to suspending or expelling a student.

Chapter 222 also requires that ESE issue a report (no later than November 30, 2013) that describes the costs that may be incurred by the state and school districts in implementing the Law. In response to that component of the legislation, ESE contracted with the Rennie Center for Education Research & Policy, Inc. (Rennie Center) and Evidence-Based Education Research & Evaluation, LLC (EBERE) – referred to as the study team throughout the course of the report – to conduct an implementation and resource cost study. The study was designed to provide education policymakers and practitioners with a detailed look at the manner in which three districts are providing academic services to students who have been suspended or expelled from school. In addition, the report describes ESE and district responses to date, and identifies the resources, and corresponding costs, associated with implementing Chapter 222 requirements.

The study was guided by the following key questions:

1. What programmatic options do school districts utilize to provide academic support to students who have been expelled or suspended? What are the key characteristics of these program models?
2. What resources are required to implement these programmatic options?
3. What does it cost to implement these programmatic options, and who bears these costs?
4. What additional non-service related costs are incurred by the state and school districts in order to comply with the Law?

The information in this report is meant to be illustrative to other districts as they plan their response to the legislation, by detailing costs of program options in an effort to support decision-making on program development to meet Chapter 222 requirements.

Background

The Chapter 222 legislation stemmed from recommendations developed by the Massachusetts Graduation and Dropout Prevention and Recovery Commission, established by *An Act to Improve Prevention and Reporting of Graduation Rates* (2008). Convened in 2008, the Commission held hearings through spring of 2009 focusing on a possible connection between disciplinary consequences for students that mandate an out-of-school suspension and a higher likelihood to drop out of school. Testimony called for a closer look at district-level discipline policies and practices; the Commission’s final report put forth the following recommendations:

- *For the Massachusetts state legislature:* Reform outdated discipline policies, and take legislative action to ensure school districts cannot refuse academic services to a suspended student.
- *For the Massachusetts Department of Elementary and Secondary Education (ESE):* Research the connection between school discipline and students’ level of engagement or alienation from school, and use this data to advise school districts on possible options to meet at-risk students’ academic needs.
- *For the Board of Elementary and Secondary Education:* Update relevant regulations concerning disciplinary policies that would exacerbate students’ alienation from school resulting from a disciplinary consequence, including the

extent to which long-term suspension (e.g., suspension of 10 consecutive days or more in a given year) should continue to be utilized.¹

These recommendations influenced the legislative requirements ultimately written into, and voted on as part of, the Chapter 222 legislation. The centerpiece of the legislative requirements is the stipulation that districts must provide suspended and expelled students the opportunity to make academic progress during the period of suspension or expulsion. Additional requirements focus on expanding, or initiating, state and district policies governing student disciplinary procedures; these requirements are described in detail below.

Policy Context for Districts. Chapter 222 introduced new school discipline policies and requirements for the provision of service affecting districts, schools, and students. Five key areas were addressed in the legislation:

- Principals/headmasters must provide an opportunity for students who are suspended or expelled to make academic progress, irrespective of the period of suspension or expulsion, and must develop a school-wide education service plan for all students who are expelled or suspended for more than 10 consecutive school days.
- Districts must adhere to specific due process requirements for student suspensions and expulsions, including the following: students and parents must be provided notice of the charges and have an opportunity to meet with the principal before the student is suspended. For students suspended for more than 10 school days, the required procedures include the right to appeal the principal's decision to the superintendent. The principal must send prior written notice to the superintendent of any out-of-school suspension of one day or more for students enrolled in grades K-3. No student may be suspended or expelled from a school or school district for more than 90 school days.
- Districts must report to ESE the specific reasons for all suspensions and expulsions, and term of disciplinary consequence (e.g., number of days of in-school or out-of-school suspension).
- A pupil absence notification program to notify parents or guardians of their students' unexcused absences must be in place.
- Students who have not graduated from high school cannot be considered to have permanently left school unless the student and parents have been notified and an exit interview conducted. Written notification of alternative education options must be provided to students and families in an effort to highlight student options for continuing their education.

Policy Context for the State. Chapter 222 initiates new duties and reporting requirements for ESE in these areas:

- Data collection and reporting, including public reporting of an expanded set of district-level data on suspensions and expulsions;
- Regulations that address a principal's duties regarding procedures required by the new law for suspension and expulsions, including procedures for including parents in student exclusion meetings;
- Protocols and processes for investigating any school that suspends or expels a significant number of students for more than 10 cumulative days in a school year;
- Resources for students leaving school (e.g., a list of alternative education options), and a model protocol for conducting a required exit interview with students who intend to drop out of school; and
- Cost reporting to document the costs of implementing Chapter 222 legislative requirements, and the annual cost of providing reimbursement for instructional costs associated with alternative education services.

While districts and ESE have begun to take up issues of implementation, challenges remain as they prepare to carry out the substantive provisions of the law by July 1, 2014. For both districts and the state, these legislative requirements come in an era of fiscal constraint. Implementation of Chapter 222 requires additional resources in the form of time for staff to develop policies and procedures, instructional resources and supports to serve this population of students, and, in some cases, technology upgrades to accommodate new tracking of students. Consequently, ESE and districts will need to make choices about a limited amount of resources available to serve this population of students to meet the requirements of the legislation.

Study Methods

Massachusetts school districts rely on a broad range of programs and resources to support students who are suspended or expelled. These programs include temporary academic interventions such as home-based or in-school

¹ Federal law governing services for students with disabilities, the Individuals with Disabilities Education Act, has for many years required that schools continue to provide educational services to special education students who are removed for their educational placement as a result of disciplinary action. Chapter 222 introduces similar requirements for general education; therefore, this report will focus on discipline policy for general education students.

tutoring, short-term placements in alternative education programs and schools, regional centers that can accommodate the short-term needs of suspended students, on-line/distance learning programs, and long-term placements in alternative education settings. A key challenge of this study was to identify existing programs that met the requirements of the Law, a full year ahead of the deadline for implementation. To address the research questions, we worked with ESE to select three programs that would exemplify the variation in approaches school districts can take to serve suspended or expelled students while meeting the requirements of Chapter 222. It is important to note that the programs in selected districts were not developed in order to comply with Chapter 222; rather, these programs are options districts *have already implemented* to serve suspended students.

Case study site selection. A variety of strategies were used to identify programs to serve as case study sites. First, the study team reviewed disciplinary incidence data from the 2011-12 school year, identifying the districts with the greatest number and percent of students suspended for 10 days or more, hypothesizing that these districts would be the most likely to have considered academic provisions for these students. Next, the study team consulted district student handbooks to capture detailed information on district discipline policies, and then conducted screening interviews with districts to determine if existing programs provided academic services to suspended or expelled students. The study team then worked with ESE staff knowledgeable about the types of programs districts have in place to meet the needs of students with suspensions/expulsions in order to expand the pool of potential sites and programs for the study. Finally, the study team consulted data from the Rennie Center overview of alternative education study.² This process identified many approaches that districts offer to suspended and expelled students. The study team then worked with ESE staff to identify and confirm the specific program option in each district's programs that met the requirements of Chapter 222 to serve as the focus of a case study (see more details below).

The program options selected for case studies represent three different approaches districts are currently using to provide academic support to students who have been suspended for 10 days or more or expelled. They include:

- Fall River's *3-to-5 program*, an on-campus tutoring program for students who cannot attend school for an extended period of time (e.g., long-term suspended students, students on medical leave, etc.) occurring after-school hours at Durfee High School;
- Springfield's *external interim alternative education setting (IAES) program* located at a district-site separate from the high school and typically serving students who have been suspended for 30 days or more; and
- North Adams' *online learning model* in which suspended students can access the Drury High School Learning Lab online.

Data collection. The study team collected four different types of data: 1) program characteristics and resources required for each of the selected program options; 2) district-based cost data associated with each of the program options; 3) district status relative to implementing the administrative requirements of Chapter 222; and 4) state level costs associated with implementing the administrative requirements by ESE.

1. **Program data.** Once sites were selected, the study team conducted in-depth, on-site interviews with administrators at each of the three districts. The study team collected detailed data on each of the selected program options and identified the specific resources required to implement the academic services associated with each program option.
2. **District-based cost data collection.** The study team collected information from district respondents to identify resources dedicated to each of the selected program options, and the costs associated with each of these resources. As follow up, the study team requested district-level documents that describe the programs and activities related to the Law's programmatic and administrative requirements for districts. Examples of documents collected include program descriptions, personnel rosters, program budgets and expenditure data, and student counts.
3. **District Administrative Status.** In addition to data on program options and resources the study team also collected information regarding the extent to which districts had begun to implement the administrative requirements of the Law.
4. **State Administrative Costs.** The study team conducted in-depth interviews with ESE personnel with primary responsibility for one or more areas of Chapter 222 related to state level administration. To do so, researchers worked with key stakeholders in ESE to identify staff members who are responsible for primary programmatic responses to the Law's implementation, including: 1) reporting district-level data on suspensions and expulsions; 2) publishing a model protocol for conducting a required exit interview with students; 3) publishing research and information related to dropping out and earning a high school diploma; 4) compiling a list of alternative education services available to a student other than those their district provides; and 5) producing recommendations of models that incorporate intermediary steps prior to the use of suspension and expulsion as a consequence for students.

² Forthcoming – public release set for Winter 2013/2014.

Analytic Approach. The study team constructed detailed resource profiles that described the personnel and non-personnel resources associated with each of the selected programs. A resource cost modeling (RCM) framework was used to identify these resources. Specifically, RCM applies an economic lens to identifying educational program costs by first identifying, from the “bottom up,” all of the resources used to provide a service or program (e.g., tutors) and then assigning dollar values to these resources.ⁱ The strength of this approach lies in its ability to clearly articulate resources used by a program in a way that other districts interested in replicating the selected models may apply. The resource cost modeling approach used to develop the cost estimates presented in this study stands in contrast to “top down” accounting-oriented approaches that rely on program budgets and expenditures to estimate the fiscal, or monetary, costs associated with program operations.ⁱⁱ Fiscal cost estimates provide a mechanism for how educational dollars are spent, but do not provide the types of information required to understand what resources were used to produce observed program or policy outcomes.ⁱⁱⁱ

The study team relied on the “ingredients method” to identify resources used by districts to implement their programs. This method calls for enumerating all of the resources used by a program to produce observed effects.^{iv} The list of ingredients specified depends on the nature of the district’s programmatic approach. For instance, in this study, districts adopted different options for providing academic services to students while they are suspended or expelled from school (e.g., small group tutoring, instructional oversight and supervision, and online learning). Each option draws on a different configuration of instructional resources, primarily personnel. Given the study’s focus on academic instruction and support, resource profiles and corresponding cost estimates primarily reflect the personnel and non-personnel resources associated with academic instruction, remediation, and support.³ That said, in the description of district efforts, other types of resources are discussed, such as non-academic services and supports (e.g., social work) that districts provided to students on a case-by-case basis, as well as other district resource considerations such as facilities, transportation and student time. For instance, we assumed that resources such as facilities and ancillary technology were not directly related to the costs associated with providing students with academic services, but rather were a characteristic of the districts’ decisions as to where they might locate the program. We describe these additional non-instructional resources in our district resource profiles, but these resources were not included in our cost estimates for providing instructional services.

In order to estimate program costs, a nested framework was used to categorize and organize resources at several levels of *program operations*: 1) program administration and oversight; 2) academic services; and 3) academic remediation and supports. Within these categories, the study team identified specific *activities* undertaken by programs to serve suspended and expelled students’ academic needs. For example, in the case of Fall River’s 3-to-5 Program, students were assigned to small groups for academic tutoring in core subject areas. In this context, “small group tutoring” was identified as a key program activity. Within each activity, the study team further distinguished between personnel and non-personnel resources used to provide suspended and expelled students with academic services. This common cost framework organized resources across study sites.

Then, a dollar value was assigned to each ingredient identified using the cost framework. Values were assigned according to the most meaningful unit (e.g., hourly wage; annual salary). Appendix B provides a summary of the resource valuations used in this study. The number of resource “units” used by a program was multiplied by appropriate resource values. For instance, two full-time equivalent general education teachers staff Springfield’s IAES program. The study team calculated the value of these resources as 2 FTE teacher units * the state average annual teacher salary,⁴ resulting in a total resource cost of \$182,180 (i.e., teacher salary, plus benefits).

None of the programs included in this study exclusively served general education students suspended from school for disciplinary reasons. For instance, programs frequently served special education students, students who could not attend school for medical reasons, and even accelerated students seeking additional course credits through an online learning environment. In cases where program resources were “shared” among different student groups, it was necessary to allocate a share – rather than the total – of the resource costs to the subpopulation of students suspended from school for disciplinary reasons. In these instances, the study team made the decision to proportionally distribute costs between students who participated in the program and all other participating students. For instance, 58% of the students who accessed Springfield’s IAES program during the 2012-13 school year were suspended students. As a

³ North Adams School District did not assign any suspended students to its Drury Online Learning Lab during the 2012-13 school year. As a result, we estimated costs based on a hypothetical number of students equivalent to the number of suspended students that might be expected in a district of comparable size.

⁴ Personnel resource costs were estimated using state average salary, wages and benefit rates for key personnel in order to facilitate comparisons across school districts. Raw unit prices (e.g., actual salary and benefits paid) complicate comparisons across districts, especially given statewide differences in the cost of living and corresponding personnel labor rates.

result, 58% of the total resource costs for the 2 FTE general education teachers (i.e., \$182,180) was allocated to the incremental costs associated with the program's efforts to serve suspended students.⁵

Study Limitations. As discussed above, the goal of this study is to document characteristics of districts' current program options for suspended and expelled students, and identify associated resources and estimate their cost. There are, however, inherent limitations with the approach taken up by the study team to do so.

- First, this study provides a snapshot of selected programs that districts had in place to serve suspended and expelled students during the 2012-13 school year – a full year ahead of new Chapter 222 requirements. While the program options provide academic services to suspended students, they were not put in place to meet the new requirements of the Law. Thus, districts may continue to make modifications to the program options that were identified and selected for the purposes of this study; districts may also make wholesale changes to current academic offerings to further align to the provisions of the Law. In either case, district modifications to academic offerings may limit the relevancy of the findings in this report.
- Second, districts selected for this study had existing program options in place to serve suspended or expelled students; as such, the study team was unable to calculate the additional, or marginal, costs of program development. In addition, because districts were in process of considering how to meet new administrative requirements, the study team was unable to calculate the full cost of district implementation. Thus, district cost estimates reflect the cost of existing programs, but do not reflect the total cost to a district of Chapter 222 implementation.
- Third, Chapter 222 legislation stipulates that districts provide academic services to students during the course of a suspension or expulsion. By definition, there is a built-in unpredictability of student referral and enrollment in these programs for which districts have to plan and budget. Through the course of this project, the study team has learned that district programs are idiosyncratic and are largely built in response to specific student needs. Both of these factors make these programs difficult to generalize across sites, and even more challenging to derive cost estimates given the standardization process that is required to do so.
- Fourth, in developing the cost estimates for the district program options, the study team considered only those resources related to providing academic services to suspended or expelled students. This focus on instruction-related costs provides districts with data on the resources used, and corresponding costs incurred, by districts to administer these program options. The study team did not identify resources related to other types of program operations and facilities, such as technology- and facility-related resources. The study team also did not consider resources that might be used by districts to provide non-academic supports such as non-academic counseling, referrals to treatment options or other services such as case management. Given the highly individualized nature of the non-academic services and supports the districts provide, it was impossible to identify a standard package of resources, and corresponding costs, for the non-academic services students might receive while participating in any one of the program options.
- Finally, the study team made the decision to allocate costs on a per student basis, assuming that the “fixed” costs associated with program operations can be equally distributed among a finite number of students, defined in terms of the total number of students served by the program during the 2012-13 school year. In reality, it may be the case that the program will serve a greater or lesser number of students. This would impact the share of costs associated with serving suspended and expelled students. However, given available data, this was the best approach to approximating the share of total resources, and corresponding costs, that would be required to serve an additional student assigned to the program.

Study Findings

In light of these caveats, the following section presents findings from the data collected by the study team from districts and ESE. The study focused on four categories of findings:

- existing district program options for academic services for suspended or expelled students, including detailed profiles;
- costs related to these existing academic program options;
- district implementation of Chapter 222 requirements; and
- state implementation of Chapter 222 requirements.

⁵ In costing out district program models, the study estimates costs based on the number of reported hours per day that a student participates in the program (see Appendix A). This results in per pupil costs that correspond with the program resources required to serve a typical student. The study team did not estimate a per pupil hour cost as pro-rating costs on an hourly basis would misrepresent the resource costs a district might incur when implementing a selected model.

Each are discussed in turn below.

District Options for Academic Service Provision: Program Characteristics

As noted above, the study team identified and selected three districts for this study which utilized different program options to serve suspended and expelled students. Among these three districts, as would be expected, there was wide variation in the specific approaches districts used to provide academic services to suspended and expelled students. Still, several common themes emerged across the study sites.

Districts are drawing lessons on how to meet student needs from programming designed for special education students. Federal law governing services for students with disabilities, the Individuals with Disabilities Education Act, has for many years required that schools continue to provide educational services to special education students who are removed from their educational placement as a result of disciplinary action. Chapter 222 introduces similar requirements for students who are not receiving special education services. Thus, it is not all together surprising that districts are drawing on existing special education services and programs to meet the needs of general education students who are suspended for disciplinary reasons. In Fall River and Springfield, district administrators expanded and modified programming offered to special education students to serve suspended general education students.

Districts employ highly individualized approaches to serving suspended and expelled students. District administrators spoke about the highly individualized nature of many of the academic services that they provide to suspended or expelled students. All of the districts selected for the study developed their respective program options through the melding together of different academic services offered to students. For example, the online learning model employed by North Adams was first utilized with one suspended student as a credit recovery strategy. Similarly, in all districts, no program option served only one type of student (e.g., special education, general education, medical leave) exclusively. Speaking to the highly individualized nature of academic service provision to this population of students, district administrators reported further customizing established program options to ensure a match between the academic services offered to suspended or expelled students and their needs. For example, a student's referral to Springfield's external IAES program comes with an individualized service plan to meet each student's academic and credit needs.

All three districts selected for this study have centralized approaches to student support services, including data tracking systems. Data gained in district interviews highlighted the extent to which districts have developed a strong centralized function dedicated to implementing a flexible array of support services for struggling students. This may emerge as key criteria in determining the burden districts face in meeting legislative requirements. Further, the extent to which districts have existing student data systems that are routinely used (e.g., with any kind of student data – performance, discipline, student services/support) may also be an important determinant in the kinds of implementation challenges that lay ahead for districts.

District Program Profiles

To adequately describe the district program options selected for this study, the study team developed a program profile of each. These profiles – beginning on the next page - highlight district context and program development of academic and non-academic offerings for students, and detail key program characteristics. To note, cost estimates provided only include academic offerings (see Table 1).

North Adams Public Schools – Drury High School Learning Lab

District context

North Adams Public Schools (NAPS) has a small student population, with just over 1,500 students enrolled in the 2012-13 school year.^v The number of out-of-school suspensions in the district is very low: in 2012-13, the district reports there were few out-of-school suspensions (ranging from 1-5 days each), and no suspensions over 10 days in length. Regardless, NAPS offers a number of multiple pathways/options for students to progress through school. Students serving out-of-school suspensions may use any combination of these options to make academic progress while out of school. One option in particular—the Drury High School Online Learning Lab—exists to serve a variety of students, and those serving out-of-school suspensions have the opportunity to make academic progress by accessing the Learning Lab's online coursework.

Program model

The Learning Lab at Drury High School was established to provide North Adams' high school students with a flexible option for online credit recovery, credit acceleration, and instructional support for traditional classroom coursework. Student work in the Lab is primarily self-directed, with oversight and assistance from the Lab's teacher and paraprofessional as needed. Students may participate in the program in-person or away from school, meaning the model has the potential to serve students who have been excluded from school for disciplinary reasons.

Program characteristics

- **Students served:** The Learning Lab can serve up to 60 students at a time, with online coursework accessible from one or more locations. Any NAPS student may participate. Of the few out-of-school suspensions in NAPS, some have had an existing IEP, mental health issues, and judicial orders to remain out of school for a short time. These students may access their online coursework through a home or library computer.
- **Referral:** To determine the best course of action for students serving out-of-school suspensions, the high school's instructional and behavioral support teams meet to evaluate students' academic record and behavioral data to determine the best course of action. There is no formal paperwork or referral process specific to the Learning Lab at this time.
- **Academic services:** The Learning Lab offers students online coursework to a wide range of academic courses. The classroom is staffed with one teacher and one paraprofessional, who monitors and guides students in an individual learning environment. Staff and students have access to computer stations.
- **Non-academic services:** Any student who attends the Learning Lab may access the high school's non-academic supports. The district's network of supports includes: academic and behavioral counselors, graduation coaches, a contracted agency managing IEP counseling, an internship coordinator, academic advising, and legal assistance.
- **Staffing:** During the 2012-13 academic year, one licensed general education teacher supervised the Learning Lab. This teacher was responsible for coordinating students' academic programming and support using Learning Lab resources, and provided instructional support and assistance to students in the program. One paraprofessional educator also supported students' academic work in the program. The program is located in Drury High School, and the Drury principal is responsible for most program administration duties. It is likely a student serving an out-of-school suspension and accessing the Learning Lab may also receive support from the Instructional and Behavioral Support team. (This team is not considered part of the Learning Lab model, but staff members are available to students in the program.)
- **Operations:** The Learning Lab is located in a separate classroom in the high school building; students are able to work at their own pace through academic courses chosen for their individual needs. The program operates year-round and is not bound by the academic calendar. Hours are flexible, and based on student needs. Students and staff access online coursework hosted by PLATO Courseware, a standards-based online learning program^{vi} at individual computer stations or at a non-school location. PLATO offers curriculum in a broad range of subjects, which can be used to attain course credit or to supplement traditional classroom instruction. The Learning Lab teacher salary and licenses for use of the PLATO system are included in the district budget each year.

Fall River Public Schools – 3-to-5 Program

District context

Fall River Public Schools had a population of just over 10,000 students enrolled in the 2012-13 school year.^{vii} The 3-to-5 Program, an after-school, small group tutoring program, is strictly academic and seeks to develop and implement a service plan for each student that allows him/her to return to school.

Program model

Hosted in the district's high school library from 3:00-5:00pm Monday-Thursday, most students in the 3-to-5 Program are serving long-term suspensions (typically 30 days) for severe disciplinary infractions.^{viii} Other students may attend 3-to-5 for a variety of reasons, many students in the program are under-credited for their grade level. Both general education and those with a special education designation may attend the program.

Program characteristics

- **Students served:** Only high school students may attend the 3-to-5 Program; most students are in 9th or 10th grade. Students in the program include special education and general education students who have been excluded from school, as well as other students who are unable to attend school for other reasons (e.g., medical reasons). The program typically supports about 30 students at any one time – attending the program for any of the reasons detailed above. In 2012-13, about 50 students attended the program during the course of the school year, 17 of the 50 students were attending the 3-to-5 program while serving a suspension.
- **Referral and transitions:** Principals may refer students to the 3-to-5 Program after a severe disciplinary incident results in a long-term suspension for a length of typically 30 days. Students assigned to the 3-to-5 Program go through an initial referral process, initiated by their high school principal or guidance counselor. Once referred, the program's coordinator reviews students' academic needs, schedules student attendance, and recruits appropriate teacher tutors. At the conclusion of a student's exclusionary period, district and school personnel work with students to coordinate their transition back to their home high school, or to an alternative school. Planning for each student's transition from serving a suspension in the 3-to-5 Program to attending school full-time involves extensive communication between the vice principal, school adjustment counselor, teacher, student, and student's family to plan for a student's return to school.
- **Academic services:** Teacher tutors lead small student groups of no more than five students on existing coursework sent from the home school. There is an academic focus on core subject areas (English language arts, science, and math), and academic counseling is available to help create a plan for students to meet individual credit needs, e.g., to ensure students have enough credits to graduate. Student groups are divided by grade levels and content. Student time on a given day is divided between two subjects, for approximately one hour each.
- **Non-academic services:** The 3-to-5 Program is designed to provide academic services only. There may be some non-academic services prescribed to suspended students as part of the exclusion process or court proceedings; however, these services are not provided at 3-to-5.
- **Staffing:** The 3-to-5 Program is overseen by a part-time program coordinator. Currently, the position is held by the high school's special education department chair; however, in the past, other district staff have held the position. The program coordinator recruits tutors on an "as needed basis" from the district's pool of certified high school teachers based on student coursework needs. During the 2012-13 academic year, the majority of teachers who worked in the program were special education teachers with content expertise. In addition to the content area tutors, an additional special educator was on-site each day to provide additional student support as needed. (District leaders noted it is difficult to find enough tutors matched to the students in the program. For this reason, the district is considering using a computer-based learning system to support the program.)
- **Operations:** The program operates from 3:00-5:00pm, four days per week during the school year. The days on which students attended the program were stratified according to grade level, with students typically attending two days per week. During the 2012-13 school year, 9th and 10th graders attended on Monday and Wednesdays, and 11th and 12th graders attended on Tuesdays and Thursdays. Transportation to the program is not provided by the district. The 3-to-5 Program does not use educational technology at this time. The program is funded through the district's operating budget in the "homebound tutoring" category.

Springfield Public Schools - Interim Alternative Education Setting

District context

Springfield Public Schools (SPS) has a large student population, with over 25,000 students enrolled in the 2012-13 school year.^x To provide academic services to long-term suspended students, SPS has expanded existing programming. At both the middle and high school levels, the district supports the use of Interim Alternative Education Settings (IAES). An IAES offers a transitional setting in which students can access academic and non-academic supports during suspensions.

Program model

SPS initially developed the IAES to meet federal and state legislative mandates requiring districts to provide educational services to students with a special education designation.^x Currently, there are two types of IAES in Springfield Public Schools: internal and external. An internal IAES is hosted by an individual school and offers a transitional setting for students serving in-school suspensions. An external IAES is hosted by the district on the middle and high school alternative education campuses, and offers a transitional setting for students serving out-of-school suspensions. (This study focused on the external IAES at the high school level only.) The district encourages schools to make referrals to internal IAES programs whenever possible and reserve external IAES referral for only the most serious disciplinary infractions. The location of each external IAES allows staff and students to access the resources provided by several alternative programs in close proximity. Schools initially refer students to an external IAES due to severe disciplinary infractions or a series of behavior problems throughout the school year; this referral usually begins a student's shift into an alternative education pathway. For these students, the IAES acts as a central point of entry for the district's multiple pathways to graduation.

Program characteristics

- **Students served:** The program serves about 10-15 students each day, approximately 15% of whom are general education students. For the purposes of this study, we focused on the high school external IAES.
- **Referral:** Students referred to the external IAES are those with multiple or severe disciplinary infractions, and referral is precipitated by a significant disciplinary incident resulting in a 30-day suspension. Once referred, the program's Assistant Principal, teachers and adjustment counselors complete student intake processes and create a service plan that meets each student's needs. Students are typically placed at an IAES for the 30 days of an out-of-school suspension. At the end of a student's time in the IAES program, students receive academic counseling from one of the program's adjustment counselors to plan for their transition back to the student's home school or an alternative school.
- **Academic services:** While assigned to the external IAES, students work on the academic coursework assigned by the teachers in their home school. IAES general and special education teachers provide instructional support (including direct instruction and tutoring) and oversight as students progress with their coursework. Students may also access credit recovery courses online in the Edunuity and NovaNet platforms.
- **Non-academic services:** In addition to supporting students' academic progress, the school district also may provide students with non-academic supports and services during their exclusionary period. The services provided are highly individualized and tailored to student needs; there is no standard package of non-academic services offered to students serving suspensions. Instead, the IAES acts as a "triage" for students with multiple disciplinary and behavioral infractions, and offers psychological evaluation, mental health screening tools, academic progress screening, an attendance officer, and a violence prevention curriculum.
- **Staffing:** A team of administrative, instructional, and student support personnel comprise Springfield's IAES program for high school students. The program is staffed by an Assistant Principal, two licensed general education teachers, and two licensed special education teachers. Two adjustment counselors work with students on academic planning, including determinations for whether they should return to their home school or transition to an alternative education placement.
- **Operations:** The high school external IAES operates during school hours five days a week during the school year. Students work with instructional staff in one of four technology-equipped classrooms located on the District's alternative education campus. Students and their families are responsible for transportation to and from their IAES placement. Both IAES's are funded through the district's operating budget.

District Options for Academic Service Provision: Program Costs

This section presents cost estimates for the academic services available to suspended students assigned to selected district program options. As discussed above, each of the districts included in this study adopted a different approach to serving suspended or expelled students' academic needs during the time period they did not attend regular high school. Readers are reminded that the cost estimates may be different from what districts budget or expend to operate their programs. Rather, the approach adopted in this study was to identify the resources required to replicate a given program's approach to providing academic services, remediation and related supports to students who have been suspended from school. The resulting cost estimates represent the value of these resources. For districts interested in adopting similar programs, or certain aspects of selected programs, these estimates provide a picture of the resources used and estimates for what these resources might typically cost a district.

Table 1 presents estimates for the total annual per pupil costs associated with the resources selected district programs used to provide for academic supports and services to students who were assigned to selected programs while suspended or expelled. For the 2012-13 school year, costs ranged from \$1,890 to \$8,559 per pupil, with Fall River School District's 3-to-5 Program the least costly program model and North Adams' Online Learning Lab the most costly. The difference in costs among the selected programs are attributable to programmatic decisions related to: 1) the variety of academic services offered to students; 2) the number of student contact hours; and 3) the number and types of instructional and academic services staff employed by programs. These differences are described below.

Districts' program options vary in the academic services they offer students. Program options in both Fall River and Springfield provide suspended students with academic counseling and planning - albeit to a different extent. In both cases, resources are in place to support decision-making about students' academic plans. In some cases, these activities are focused on transitioning a student back to his or her home school, and in other instances it involves placement and transitions to a new learning environment (e.g., an alternative education school). In Fall River, the high school guidance counselor coordinates these efforts, with input and cooperation from other key personnel, including the school principal, and program's coordinator, and the District's special education director. By comparison, Springfield's external IAES program employs two full-time school adjustment counselors, who provide academic counseling and planning, as well as transitional support. Although the adjustment counselors may receive support and help from other key personnel (e.g., school principal), their primary responsibility is to plan and coordinate these efforts.

Increased student contact hours increase the amount of resources to run the program. Programmatic decisions regarding the number of hours students participate in the program are a key factor in determining program resources. One of the primary contributing factors to relatively low per pupil costs associated with Fall River's 3-to-5 Program is the program's number of student contact hours. On average, students attend the program approximately four hours per week. The days on which students attended the program were stratified according to grade level, with students typically attending two days per week. During the 2012-13 school year, 9th and 10th graders attended on Monday and Wednesdays, and 11th and 12th graders attended on Tuesdays and Thursdays. Student time on a given day was divided between two subjects (one hour each). For instance, during the 2012-13 academic year, students received ELA and history tutoring on Mondays and Tuesdays, and math and science tutoring on Wednesdays and Thursdays.

In contrast, students assigned to Springfield's external IAES program are required to be on-site at the program's facilities (located on the district's alternative education campus) for the full school day, each day during the suspension period. Similarly, in developing cost estimates for an online learning lab similar to what currently is in place at North Adams' Drury High School, we assumed that students would be online six hours per day, each day during their suspension period.⁶ In both cases, the programs' additional student contact hours come with the requirement for additional staff time for academic support and supervision while students are onsite.

Decisions on program staff represent a key factor in program cost. The number of academic services and student contact hours required by programs play an important role in determining the amount and type of staff available - a key program cost driver. During a typical week, Fall River's 3-to-5 Program requires about 16 hours of teacher time for

⁶ As previously noted, during the 2012-13 school year, the North Adams' Drury Online Learning Lab was not used to provide academic services to suspended or expelled students. As a result, we developed our cost estimates based on the assumption that the Drury Online Learning Lab represents a potential model that another district could adopt and, in doing so, the Lab would be used exclusively to serve suspended students who would utilize the online offerings of the Learning Lab each day, all day during the period of the suspension.

tutoring students excluded from school for disciplinary reasons.⁷ Teachers are recruited from the existing pool of high school teachers as needed, and work on an hourly basis.

This flexible approach to teacher staffing allows the program to adjust to the ebb and flow of students coming in and out of the program, as well as match student needs with teacher expertise. Teachers also are paid an hourly per diem (\$30/hour), without benefits.⁸ This labor rate is considerably below (nearly half) the average hourly rate based on the state average teacher salary, with benefits. Depending on assumptions regarding teacher compensation, Fall River's 3-to-5 Program's costs range between \$1,890 and \$4,154 per pupil. (See Table 1, Assumption 1 vs. Assumption 2 for Fall River's 3-to-5 Program Costs.) This suggests that the relatively lower per pupil costs realized by Fall River's 3-to-5 Program are not only tied to its flexible staffing arrangement, but also the district's approach to compensating its teacher tutors.

In contrast, Springfield's IAES program relies on a staffing model that includes four full-time teachers (two general education and two special education). This staffing model assumes a fixed level of instructional resources for direct instruction and supervision, up to the program's capacity during a given school year.

The North Adams' Online Learning Lab also relies on a fixed staffing plan, although with fewer dedicated instructional personnel. During the 2012-13 academic year, one full-time teacher and one part-time paraprofessional educator (ten hours per week) provided instructional supervision and support to students. Although the annual per pupil costs for the online learning system were modest (about \$400 per student, for six credit hours per day), it was the personnel costs associated with academic support, distributed over a small number of students (i.e., 10) that resulted in the model's relatively high per pupil costs.

⁷ On average, the program requires about 48 teacher hours per week to support the 50 students per year who are assigned to the program, including special education students, students who cannot attend school for medical reasons, and students excluded from school for disciplinary reasons. Based on the program's experience during the 2012-13 school year, approximately one-third of the total number of students assigned to the program were excluded from school for disciplinary reasons. Proportionally pro-rating the total teacher hours according to the share of excluded students in the program results in the estimate of 16 teacher hours per week noted in the above text.

⁸ The \$30/hour teacher per diem is exclusive of fringe benefits, and is paid as an hourly wage for teachers' after-school work.

Table 1. Resource cost estimates

Resource Costs Associated with Excluded Students' Program Participation			North Adams	Fall River		Springfield
				Assumption #1 ^a	Assumption #2 ^a	
Program administration and oversight	Program Oversight	Personnel ^c	\$ 22,773	\$ 11,689	\$ 11,689	\$ 24,977
	Student Intake / Evaluation	Personnel ^c	N/A	\$ 1,836	\$ 1,836	\$ 3,497
	<i>Subtotal</i>		\$ 22,773	\$ 13,525	\$ 13,525	\$ 28,474
Academic services	Tutoring (Small Group)	Personnel ^c	N/A	\$ 17,626	\$ 56,106	N/A
	Instructional Oversight / Assistance	Personnel ^c	N/A	N/A	N/A	\$ 211,329
	Online coursework	Personnel ^c	\$ 71,738	N/A	N/A	N/A
		Non-personnel	\$ 4,800	N/A	N/A	N/A
<i>Subtotal</i>		\$ 76,538	\$ 17,626	\$ 56,106	\$ 211,329	
Academic remediation and supports	Transition Planning / Academic Counseling	Personnel ^c	\$ 0.00	\$ 980	\$ 980	\$ 68,327
	<i>Subtotal</i>		\$ 0.00	\$ 980	\$ 980	\$ 68,327
Instructional-related Costs for Excluded Students Assigned to Program			\$ 99,310	\$ 32,130	\$ 70,611	\$ 308,131
Total Suspended Students (2012-13)			12 ^b	17	17	36
Total Per Pupil Instructional Costs			\$ 8,276^d	\$ 1,890^d	\$ 4,154^d	\$ 8,559^d

^a **Assumption 1:** Tutors paid hourly per diem (\$30/hour). **Assumption 2:** Tutors paid pro-rated hourly rate based on state average teacher salary. Assumption 1 presents a cost estimate based on the rates Fall River actually pays its teachers to tutor students in the 3 to 5 program. Assumption 2 is presented to make Fall River's cost estimate comparable to North Adams and Springfield, which are based on average teacher salary.

^b Note on North Adams: It is important to note that the North Adams School District did not use its Online Learning Lab to provide academic supports and services to suspended or expelled students during the 2012-13 academic year. However, the district's Online Learning Lab, as currently configured, could be used to support up to 12 students (six course periods per day).

^c Personnel costs allocated on a pro rata basis equivalent to the proportion of suspended students to total student enrollment of program. See additional notes in Analytic Approach section.

^d Per pupil instructional cost estimate presumes program operation costs (e.g., personnel, non-personnel) can be equally distributed among suspended students enrolled in the program in 2012-13. Please note that programs may not be at capacity with 2012-13 enrollments, and the enrollment of additional students would impact the share of costs associated with serving suspended and expelled students. However, given available data, this was the best approach to approximating the share of total resources, and corresponding costs, that would be required to serve an additional student assigned to the program.

District Implementation of new Chapter 222 requirements

Chapter 222 introduced new procedural and reporting protocols as part of a set of administrative requirements affecting districts, schools, and students. In addition to the data collected from districts selected for this study on established program options serving suspended students, the study team also collected data on the extent to which these districts are currently meeting administrative requirements of Chapter 222. District activity ranged from already meeting new regulations with existing policies and procedures to not having begun to plan a response. Given this variation, the study team was unable to construct cost estimates for this component of the study as districts were unable to provide detailed information on resources associated with development of policies and procedures already in place and could not predict the resources that would be required to develop new policies and procedures. Discussion of common trends appears below; specific findings for each of the three districts appear in Appendix C.

Districts are meeting new Chapter 222 requirements, prior to enactment of the Law. Sites selected for this study, for the most part, are already meeting some of, but not all, new discipline policy requirements (see additional detail in Appendix C). Across all three districts, policies and procedures already in place include a pupil absence notification program. All three districts also have some processes in place governing whether a student has formally left school; although they may not rise to the level of formal policy as most districts describe an informal process governing exit interviews.

Where districts are not yet meeting new Chapter 222 requirements, they have not yet developed plans for new policies or protocols that would meet legislative requirements. Reflective of the implementation timeline of Chapter 222 requirements,

the three districts in this study are not yet meeting all new discipline policy requirements (see additional detail in Appendix C). For example:

- Districts are not yet meeting requirements to notify the superintendent in writing when a K-3 student is suspended from school.
- Springfield has not yet developed a school-wide education service plan for suspended or expelled students.
- North Adams does not currently convene exit interviews with students who have permanently left school.

State Implementation of new Chapter 222 requirements

Chapter 222 introduces new procedural and reporting requirements for ESE in four areas: (1) data collection and reporting; (2) regulations; (3) resources, including information for students who intend to drop out of school; and (4) cost reporting. Interviews with ESE staff responsible for addressing these areas indicate that the department has made substantial progress towards implementation of the new requirements across all areas (see Appendix D). The following section presents findings on what was learned about progress in the course of these interviews. Also presented is an accounting of resources used to support ESE's response to new Chapter 222 requirements (see Appendix E).

ESE will soon meet both data collection and reporting requirements stipulated by Chapter 222 requirements. Chapter 222 requires ESE to define data reporting requirements regarding suspension and expulsions for districts and charter schools, including data on the specific reasons for all suspensions and expulsions. In addition, ESE is required to make these data available to the public online. Interviews with ESE staff revealed that prior to the passage of Chapter 222, ESE made changes to an existing data collection, the School Safety and Discipline Report (SSDR), to collect additional data on district disciplinary actions and to streamline the process districts utilized to report on discipline data. These modifications to the data collection process went into effect for the 2012-13 school year, and are aligned with the new requirements of Chapter 222 (see additional detail in Appendix D). As the actions governing this alignment occurred *prior* to the changes in Chapter 222, as opposed to being a *result of* Chapter 222 modification, the costs associated with these changes were not considered in estimates provided below. Reports drawing on the new data being collected through the SSDR are currently being developed and will align with requirements of Chapter 222 to the extent feasible; these costs have been included in estimates presented below.⁹ The study team estimates that the personnel cost for developing new reports related to the suspension/expulsion data will be \$50,000, with a recurring annual cost of \$2,326 for maintenance of the reporting system (see Table 2 and Appendices D and E for additional detail).

Currently, ESE is focusing on the development of new regulations for principals, and protocols to use with at-risk students.

According to the new provisions of Chapter 222, ESE is to promulgate regulations addressing two areas: (1) investigation of schools that suspend or expel a significant number of students for more than 10 cumulative days in a school year, and (2) principal's duties under new Section 37 H $\frac{3}{4}$ related to procedures for including parents in student exclusion meetings, hearings or interviews. In addition, ESE must publish a model protocol for conducting exit interviews with students who intend to drop out of school, and compile research and information relative to the consequences of dropping out, the benefits of earning a high school diploma, and a list of alternative education resources/programs available to students considering permanently leaving public school without graduating.

In regards to the regulations for principals, a working group of ESE staff, with leadership from the legal office, has been developing regulations for presentation to the Board of Elementary and Secondary Education in December 2013, and then a final vote in Spring 2014. To date, the work of the group has focused primarily on developing regulations governing a principal's duties under Section 37 H $\frac{3}{4}$. The personnel costs to date for developing regulations related to principals' duties under new Section 37H $\frac{3}{4}$ and procedures for including parents in student exclusion meetings, hearings or interviews is \$5,739 (see Table 2 and Appendices D and E for additional detail).

Relevant to the protocols and resources for students, ESE has developed a model protocol and is going through internal review; this is newly created information (see additional detail in Appendix D below). Information on the consequences of dropping out is being compiled, and ESE staff are creating a resource list of alternative education options. This list is based on some resources that already existed at ESE on alternative education schools and programs. The personnel costs to date for developing information for students who intend to drop out of school are estimated to be \$10,342. (see additional detail in Table 2 below, and Appendices D and E).

The status of additional cost reporting requirements is unclear. New requirements for ESE regarding cost reporting include an annual report on instructional costs associated with providing alternative educational services; and a report on the

⁹ Some of the language in Chapter 222 regarding data reporting is conflicting. More specifically, reports cannot be both de-identified and disaggregated by student status, as required by the legislation.

costs of implementation of Chapter 222. As this part of the work does not begin in full until July 2014, ESE has not yet assigned staff to this task. The report on the costs of Chapter 222 implementation is this report. The cost reporting tasks include both ESE personnel and contractor costs are estimated to be a one-time cost of \$58,214 (see additional detail in Table 2 below and in Appendices D and E).

Table 2. State resource cost estimates

Resource costs associated with ESE activities					
Implementation task	Activity	Sub-activity	Ingredients	One-time costs	Recurring annual costs
Data collection & reporting	Defined data reporting requirements regarding suspensions & expulsions for districts/charter schools	No new resources	N/A	N/A	N/A
		System maintenance for new online reports	Personnel	\$ 0	\$ 2,326
	System of collecting data from districts/charter schools on the specific reasons for all suspension and expulsions	No new resources	N/A	N/A	N/A
		System for making available to the public (online) a district-level de-identified data, disaggregated by student status	Develop new research files and files for public use	TBD	TBD
	New or existing resources ESE will need to tabulate suspension/expulsion data	Develop new online reports	Personnel; IT system design and resources	\$ 50,000	\$ 0
<i>Subtotal</i>				\$ 50,000	\$ 2,326
Regulations	Regulations that govern a process for investigation each school that suspends or expels a significant number of students for 10+ cumulative days in a school year	ESE investigative work with districts	Personnel	N/A	TBD
		Create new data analysis tool that supports district identification	TBD	TBD	TBD
	Regulations that govern a principal's duties under new Section 37H ¼ & procedures for including parents in student exclusion meetings, hearings or interviews	Regulation development	Personnel	\$ 5,739	\$ 0
<i>Subtotal</i>				\$ 5,739	\$ 0
Information for students who intend to drop out of school	Published a model protocol for conducting exit interviews with students who intend to drop out of school	Developed model protocol for districts	Personnel	\$ 3,043	N/A
		Creating list of alternative education resources	Personnel	\$ 3,528	TBD
	Compiled a list of research & information relative to the consequences of dropping out, the benefits of earning a high school diploma, and a list of alternative education resources/programs	Creating a brochure on the impact of dropping out of school that is suitable for use by students and parents	Personnel	\$ 3,771	TBD
<i>Subtotal</i>				\$ 10,342	\$ 0
Cost reporting	Developed an annual report on the cost of providing reimbursement for instructional costs associated with providing alternative educational services	TBD	TBD	TBD	TBD
		Resources ESE dedicated to developing a report on the costs of Chapter 222 implementation	Current report	Personnel; contractor	\$ 58,214
<i>Subtotal</i>				\$ 58,214	\$ 0
Total				\$ 116,081	\$ 2,326

Conclusion

This study, conducted by Rennie Center and EBERE in response to a Chapter 222 legislative provision, was designed to provide education policymakers and practitioners with information on the costs to school districts and ESE associated with implementing new Chapter 222 requirements. The approach taken by the study team provides a detailed look at the manner in which three districts are currently providing academic services to students who have been suspended or expelled from school, as well as documents the extent to which districts and ESE are developing responses to legislative requirements that take effect on July 1, 2014.

In the three districts selected for the study, there was wide variation in the program options used to provide academic services to suspended or expelled students. Each of the districts in this study adopted a different approach to serving these students' academic needs during the time they were out of school. Participating districts ranged from having already met some of the new administrative requirements of Chapter 222 to not having begun to plan a response. Given this variation, the study team was unable to construct cost estimates for this component of the study.

In addition, the report describes ESE responses to date, and identifies the resources, and corresponding costs, associated with implementing Chapter 222 requirements at the state-level. Interviews with ESE staff indicate that Department has made substantial progress towards implementation of the new requirements of the Law.

Appendix A: Key Resources Associated with Academic Programs for Suspended Students

	<i>Drury High School Online Learning Lab (North Adams)</i>	<i>3-to 5 Program (Fall River)</i>	<i>Interim Alternative Education Setting (Springfield)</i>
Program Oversight			
Program Oversight	<ul style="list-style-type: none"> ▪ The Learning Lab's FT general education teacher spends approximately 25% of her time coordinating student learning activities at the online learning center. 	<ul style="list-style-type: none"> ▪ A part-time Program Coordinator (10 hours per week) oversees the program. Coordinator is paid a \$30/hour per diem. ▪ Currently, the position is staffed the by the high school's Special Education Department Chair. 	<ul style="list-style-type: none"> ▪ Program is coordinated and supervised by a 0.5 FTE Assistant Principal.
Student Intake & Initial Service Coordination	<ul style="list-style-type: none"> ▪ None. 	<ul style="list-style-type: none"> ▪ Key administrative and instructional personnel coordinate a student's transition to the program and set up required academic services. ▪ For the purpose of developing cost estimates it was that the high school principal, the District's Executive Director of Special Education & Student Services, high school guidance counselor, and the program's coordinator each spends on average of 30 minute per student on initial intake activities. 	<ul style="list-style-type: none"> ▪ Key administrative and instructional personnel coordinate a student's transition to the program and set up required academic services. ▪ For the purpose of developing cost estimates it was assumed that the high school principal spends approximately 30 minutes preparing paperwork per referral. The program's Assistant Principal and Adjustment Counselor spends on average of one hour per student on initial intake activities.
Academic Services			
Small Group Tutoring	<ul style="list-style-type: none"> ▪ None 	<ul style="list-style-type: none"> ▪ Students receive tutoring in small groups on core academic subject coursework. Typically, there are no more than five students per group, and groups may include both special and general education students who have been excluded from school, as well as other students who are unable to attend school for medical and other reasons. ▪ Tutoring is available 4 days per week (M-Thurs) for 2 hours per day. Typically, there are no more than 30 students onsite per day and, on average, six licensed teachers lead group tutoring sessions each day. Teachers are paid an hourly per diem of \$30/hour. 	<ul style="list-style-type: none"> ▪ None.
Instructional Oversight & Assistance	<ul style="list-style-type: none"> ▪ None. 	<ul style="list-style-type: none"> ▪ None. 	<ul style="list-style-type: none"> ▪ 2 FTE licensed general education teachers and 2 FTE special education teachers provide assigned students with instructional support and assistance.
Online Credit Recovery & Instructional Support	<ul style="list-style-type: none"> ▪ 1 FTE licensed general education teacher and .33 FTE paraprofessional supervise and assist students who work in the online learning lab. ▪ The District currently holds 10 PLATO Courseware concurrent seat licenses for its "Secondary Learning Library." This Library is comprised of full courses and content titles that supplement/overlap with face-to-face instruction. The cost per license is \$400/year. 	<ul style="list-style-type: none"> ▪ N/A 	<ul style="list-style-type: none"> ▪ N/A

	<i>Drury High School Online Learning Lab (North Adams)</i>	<i>3-to 5 Program (Fall River)</i>	<i>Interim Alternative Education Setting (Springfield)</i>
Academic Remediation, Supports & Services			
Transition Planning & Academic Counseling	<ul style="list-style-type: none"> District does not provide transitional planning and support to students assigned to the learning lab during their exclusionary period. 	<ul style="list-style-type: none"> Key personnel work with students at the end of exclusionary period to coordinate transition back to high school, or to counsel and coordinate a student's move to an alternative education setting. For the purposes of developing cost estimates, it was assumed that the high school principal and program's coordinator spend on average 30 minutes per student engaged in these activities; the high school guidance counselor spends approximately one hour per student engaged in these activities. 	<ul style="list-style-type: none"> Key personnel work with students at the end of exclusionary period to coordinate transition back to high school, or to counsel and coordinate a student's move to an alternative education setting. 2 FTE Adjustment Counselors work with students on academic planning, including determinations for whether they should return to their home school or transition to an alternative education placement. For the purposes of developing cost estimates, it was assumed that the high school principal and the program's assistant principal spend on average 30 minutes per student transition; the program's adjustment counselors spend on average of one hour per student for transition planning.
Dedicated Program Staff			
Program Administration	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> .25 FTE Program Coordinator (10 hours per week) 	<ul style="list-style-type: none"> 1.5 FTE Assistant Principal
Instructional Staff	<ul style="list-style-type: none"> 1 FTE licensed general education teacher 1 FTE paraprofessional 	<ul style="list-style-type: none"> Licensed high school teachers who currently work at District's high school. Number varies according to number of students assigned to program and student tutoring needs. On average, 6 teachers are assigned to the program each day. 	<ul style="list-style-type: none"> 2 FTE licensed general education teachers 2 FTE licensed special education teachers
Academic Support Staff	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> 2 FTE School Adjustment Counselors
Student Time Requirement			
Student Participation Requirement	<ul style="list-style-type: none"> Students are expected to work online in the learning lab during regular school hours. 	<ul style="list-style-type: none"> The program operates from 3-5 p.m. Monday – Thursday each week during the school year. During their suspension, students are expected to attend the program two days per week. 	<ul style="list-style-type: none"> During their suspension, students are expected to attend the program during regular school hours from Monday-Friday.
Summer Program	<ul style="list-style-type: none"> The Learning Lab is available to students during the academic year and summer months. 	<ul style="list-style-type: none"> The program does not operate during summer months. 	<ul style="list-style-type: none"> The program does not operate in the summer
Number of Students Served (2012-2013 Academic Year)			
Total Number of Students ^a	60	50	62
Total Number of Students Served – Disciplinary Suspension	12 ^b	17	36

^a “Combined” programs serve students other than those who have been suspended from school for disciplinary reasons. The total number of students in these instances reflects the number of other students (e.g., special education, medical leave, etc.) and suspended students who participated in the program during the 2012-13 academic year.

^b As a matter of policy, North Adams School District does not suspend students for extended time periods (i.e., >10 days). For the purposes of developing cost estimates, it was assumed that approximately 20% of students served by a learning lab in a hypothetical district that adopted this program model would be served by the program.

Appendix B: Resource Values Used in Cost Estimate Calculations

School Personnel	State Average Salary	State Average Salary with Benefits ^o	Information Source
Licensed Teachers	\$70,340	\$91,090	Massachusetts Department of Elementary & Secondary Education (http://profiles.doe.mass.edu/state_report/teachersalaries.aspx)
School Principal	\$105,139	\$136,155	Median salary information (from salary.com) was collected for a diverse sample of districts. This data was adjusted for geographic wage variations using the Comparable Wage Index (CWI; Taylor) and a state average was calculated.
Assistant School Principal	\$86,128	\$111,535	Median salary information (from salary.com) was collected for a diverse sample of districts. This data was adjusted for geographic wage variations using the Comparable Wage Index (CWI; Taylor) and a state average was calculated.
Guidance/Adjustment Counselor	\$55,000	\$71,225	State average salary available from indeed.com.
Para-professional Educator	\$29,130	\$37,723	State average salary available from indeed.com.

^o Assumes a benefit rate of 29.5% applied to state average salary.

Appendix C: District Implementation of Chapter 222 Requirements

Implementation	North Adams	Fall River	Springfield
Discipline procedures			
District provides: written notice to the student & parent/ guardian of the reasons for suspension or expulsion; and, opportunities for student to meet with principal to discuss the reasons for suspension/expulsion, before the suspension/expulsion takes effect.	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ Due process and ability to appeal, overseen by high school principal and dean of students. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ Due process and ability to appeal, overseen by principal. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ Response plan implemented by principal and assistant principal.
District has an existing policy that describes how a student might appeal a suspension/ expulsion decision.	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ In process of determining if existing process is compliant with law. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ District consulted with attorney to ensure existing policy is compliant with law. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ Policy detailed in handbook.
District requires principals to notify the superintendent in writing when a student K-3 has been suspended from school (including the nature of the incident, reason for out of school suspension, and length of suspension).	<ul style="list-style-type: none"> ▪ Yes, <i>development underway</i>. ▪ Principals record all disciplinary removal in an online student information system; elementary principals notify superintendent. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ School committee has voted on the issue, and policy has been written into the student handbook. District now in implementation phase. 	<ul style="list-style-type: none"> ▪ No, <i>not yet done</i>. ▪ District has plans to develop by revising code of conduct.
Opportunities for students to make academic progress			
District currently develops “school wide education service plans” for students who are suspended for >10 consecutive days/ expelled (so students may continue to make academic progress while away from school).	<ul style="list-style-type: none"> ▪ Yes, <i>development underway</i>. ▪ High school staff develops school-wide service plans for suspensions. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ Occurs after a disciplinary removal. 	<ul style="list-style-type: none"> ▪ No, <i>not yet done</i>.
Data reporting			
District has a system in place for identifying, tallying and reporting discipline incidents.	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ School staff (principal, assistant principal, and dean of students) records incidents and reasons in student information system. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ School staff record in- and out-of-school suspensions in student information system. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ School staff (assistant principal) record incidents in student information system monthly.
Pupil absence notification			
District has a “pupil absence notification program” in place.	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ School staff (dean of students and assistant principal) contact parent/ guardian after a designated number of absences. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ School staff (vice principal or attendance officer) contact parent/guardian after a designated number of absences. High school tracks electronically. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ District has a detailed parent notification process.
District has a policy whereby a district/school official meets with parents/guardians of students who have 5+ unexcused absences to develop an action plan for attendance.	<ul style="list-style-type: none"> ▪ Yes, <i>development underway</i> ▪ Contact with parent/guardian at 5 absences typically results in a meeting. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ School staff (administration or attendance officers) initiates contact with parent/guardian if needed. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ Part of parent notification process (above); school officials may do a home visit.
Process for establishing that a student has permanently left school			
District has a policy and/or process for establishing that a student has permanently left school.	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ Schools send drop letters to out of school student; if no response, out of school students coded as “permanently out” in student information system. 	<ul style="list-style-type: none"> ▪ Yes, <i>development underway</i>. ▪ Middle and high school staff (vice principal or attendance officer) track students; follow protocol for contact with out of school students. 	<ul style="list-style-type: none"> ▪ Yes, <i>already done</i>. ▪ Use several pieces of data to determine if student has left school permanently.
District (and/or schools) convenes exit interviews with students who have permanently left school.	<ul style="list-style-type: none"> ▪ No, <i>not yet done</i>. 	<ul style="list-style-type: none"> ▪ Yes, <i>development underway</i>. ▪ Contact initiated by middle and high schools. 	<ul style="list-style-type: none"> ▪ Yes, <i>development underway</i>. ▪ Interviews conducted by school counselors.

Appendix D: State Implementation of Chapter 222 Requirements

Legislative requirement	State implementation to date
Data collection and reporting	
Defined data reporting requirements regarding suspensions and expulsions for districts/charter schools.	<ul style="list-style-type: none"> ▪ <i>Yes, already done.</i> ▪ ESE is on-track for meeting requirements; the collection of discipline data that meets Chapter 222 requirements is done in the School Safety and Discipline Report (SSDR) for the first time during the 2012-13 school year. ▪ SSDR formerly used in response to federal requirements: safe and drug free schools (all felony-type incidences), IDEA (all disciplinary incidents for SPED students). Now tracks all incidences for all students. ▪ Districts must report all instances of student discipline charge for an in-school suspension, out of school suspension, or expulsion. Incident must be further defined if it is a drug or violent incident for federal compliance. ▪ Data reporting requirements are being met in fall 2013 (based on the 2012-13 school year data), and are being done currently to meet Chapter 222 requirements. New, additional reports available on ESE website on suspensions and expulsions, offense type and different sub-groups.
System of collecting data from districts/charter schools on the specific reasons for all suspension and expulsions.	<ul style="list-style-type: none"> ▪ <i>Yes, already done.</i> ▪ See discussion above on new SSDR modifications.
System for making available to the public (online) a district level de-identified data, disaggregated by student status.	<ul style="list-style-type: none"> ▪ <i>Yes, development underway.</i> ▪ Profiles have high-level data - and it has the total number of suspensions per school and per district. Additional reports will be developed, including: aggregate suspension numbers at school and district level and % expelled or suspended by different subgroups. ▪ Additional de-identified student-level data is in research files/ datasets under development. With these, researchers can get more information on particular set of students.
New or existing resources ESE will need to tabulate suspension/expulsion data.	<ul style="list-style-type: none"> ▪ Additional resources will be allocated to build new reporting protocols in existing information technology (IT) data platform. ▪ Maintaining the system will take about a week's worth of an analyst's time per year.
Regulations	
Regulations that govern a process for investigating each school that suspends or expels a significant number of students for 10+ cumulative days in a school year.	<ul style="list-style-type: none"> ▪ <i>Yes, development underway.</i> ▪ The development of regulations to meet legislative requirements will focus on principals' duties, not regulations for the investigations process. ▪ Timeline developed for new regulations (see below) will govern the development of any regulation that is development on the investigations process.
Regulations that govern a principal's duties under new Section 37H% & procedures for including parents in student exclusion meetings, hearings, or interviews.	<ul style="list-style-type: none"> ▪ <i>Yes, development underway.</i> ▪ No existing regulations or procedures related to principal's duties on including parents. Currently ESE is creating a first draft of regulations, and meeting with key constituencies. ▪ Process for drafting regulations: Meet internally and discuss the law, and ideas for regulation. Obtain informal input from key constituent groups. Draft regulations are voted on by BESE to approve regulations for formal public comment (scheduled for December). Release for public comment and weigh all concerns. Package of regulations that will be presented to BESE is developed, and final presentation is made to BESE. Regulations are then published with the Secretary of State's office.
Information for students who intend to drop out of school	
Published a model protocol for conducting exit interviews with students who intend to drop out of school.	<ul style="list-style-type: none"> ▪ <i>Yes, development underway.</i> ▪ No existing protocol; no existing state laws. Districts encouraged to follow-up with students once they have dropped out of school; unclear whether this practice is implemented. ▪ Creating a model exit interview protocol & specifies what tasks districts need to do. ▪ Currently developing a final draft for cross-agency review. Existing draft has been through one round of internal review. ▪ Will be ready to be published/released to districts and online in fall 2013.
Compiled a list of research & information relative to the consequences of dropping out, the benefits of earning a high school diploma, and a list of alternative education resources/programs available to students considering permanently leaving public school without graduating.	<ul style="list-style-type: none"> ▪ <i>Yes, development underway.</i> ▪ No existing resources on the consequence (to students) of drop-out; some existing resources on alternative education resources and programs. ▪ Creating descriptions of all of the kinds of programs that districts offer and a link to ESE database of alternative education schools and programs. Attempting to create a brochure that could be interesting and useful in conversations with students. ▪ Roll out is expected in fall 2013; same general timeline as model protocol.
Cost reporting	
Developed an annual report on the cost of providing reimbursement for instructional costs associated with providing alternative educational services.	<ul style="list-style-type: none"> ▪ <i>No, not yet done.</i> ▪ ESE lead responsibility not yet assigned.
Resources ESE dedicated to development of the report on the costs of implementation of Ch.222.	<ul style="list-style-type: none"> ▪ <i>Yes, development underway.</i> ▪ Staff resources dedicated from Office of Planning, Research and Delivery Systems, and Office of College and Career Readiness.

Appendix E: Key Resources Associated with State Implementation of Chapter 222 Requirements

<i>Implementation Tasks</i>		<i>Resource Costs Associated with New ESE Activities</i>	
<i>Activity</i>	<i>Sub-activity</i>	<i>One-time Costs</i>	<i>Recurring Annual Costs</i>
Data Collection & Reporting			
<ul style="list-style-type: none"> ▪ Defined data reporting requirements regarding suspensions & expulsions for districts/charter schools 	<ul style="list-style-type: none"> ▪ Develop new online reports 	<ul style="list-style-type: none"> ▪ N/A 	<ul style="list-style-type: none"> ▪ N/A
	<ul style="list-style-type: none"> ▪ System maintenance for new online reports 	<ul style="list-style-type: none"> ▪ N/A 	<ul style="list-style-type: none"> ▪ 40 hours per year of analyst time to maintain online reports
<ul style="list-style-type: none"> ▪ System of collecting data from districts/charter schools on the specific reasons for all suspension and expulsions 	<ul style="list-style-type: none"> ▪ No new resources 	<ul style="list-style-type: none"> ▪ N/A 	<ul style="list-style-type: none"> ▪ N/A
<ul style="list-style-type: none"> ▪ System for making available to the public (online) a district-level de-identified data, disaggregated by student status 	<ul style="list-style-type: none"> ▪ Develop new research files for public use 	<ul style="list-style-type: none"> ▪ TBD 	<ul style="list-style-type: none"> ▪ TBD
<ul style="list-style-type: none"> ▪ New or existing resources ESE will need to tabulate suspension/expulsion data 	<ul style="list-style-type: none"> ▪ No new resources 	<ul style="list-style-type: none"> ▪ \$50,000 in development costs for new online report; cost estimate assumes that one report will be developed 	<ul style="list-style-type: none"> ▪ TBD
Regulations			
<ul style="list-style-type: none"> ▪ Regulations that govern a process for investigation each school that suspends or expels a significant number of students for 10+ cumulative days in a school year 	<ul style="list-style-type: none"> ▪ ESE investigative work with districts 	<ul style="list-style-type: none"> ▪ TBD 	<ul style="list-style-type: none"> ▪ TBD
	<ul style="list-style-type: none"> ▪ Create new online data analysis tool that supports district identification 	<ul style="list-style-type: none"> ▪ TBD 	<ul style="list-style-type: none"> ▪ TBD
<ul style="list-style-type: none"> ▪ Regulations that govern a principal's duties under new Section 37H & procedures for including parents in student exclusion meetings, hearings or interviews 	<ul style="list-style-type: none"> ▪ Regulation development 	<ul style="list-style-type: none"> ▪ 5 days of time spent by (each) lead staff overseeing regulations development (Associate Commissioners) 	<ul style="list-style-type: none"> ▪ N/A
Information for Students Who Intend to Drop Out of School			
<ul style="list-style-type: none"> ▪ Published a model protocol for conducting exit interviews with students who intend to drop out of school 	<ul style="list-style-type: none"> ▪ Create draft exit interview protocol & checklist for districts to use 	<ul style="list-style-type: none"> ▪ 60 hours to develop model tool for districts (High School Grad Initiatives Coordinator) 	<ul style="list-style-type: none"> ▪ N/A
<ul style="list-style-type: none"> ▪ Compiled a list of research & information relative to the consequences of dropping out, the benefits of earning a high school diploma, and a list of alternative education resources/programs 	<ul style="list-style-type: none"> ▪ Create a brochure on the impact of dropping out of school that is suitable for use by students and parents ▪ Create list of alternative education resources 	<ul style="list-style-type: none"> ▪ 60 hours (High School Grad Initiatives Coordinator) and 15 hours (Dropout Prevention Specialist) to develop brochure 	<ul style="list-style-type: none"> ▪ TBD
Cost Reporting			
<ul style="list-style-type: none"> ▪ Developed an annual report on the cost of providing reimbursement for instructional costs associated with providing alternative educational services 	<ul style="list-style-type: none"> ▪ TBD 	<ul style="list-style-type: none"> ▪ TBD 	<ul style="list-style-type: none"> ▪ TBD
<ul style="list-style-type: none"> ▪ Resources ESE dedicated to developing a report on the costs of Chapter 222 implementation 	<ul style="list-style-type: none"> ▪ See One-time cost column for explanation of activities. 	<ul style="list-style-type: none"> ▪ 20 hours to complete RFP development and bidder selection and contract set up (Associate Commission level) ▪ 32 hours (Associate Commissioner) and 48 hours (Policy Analyst) on contract oversight; ▪ 20 hours on report preparation for legislature (each – Associate Commissioner; Policy Analyst) ▪ 5 hours review of report (each – High School Grad Initiatives Coordinator; Commissioner) ▪ Rennie Center contract value, \$49,965. 	<ul style="list-style-type: none"> ▪ N/A

Endnotes

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