



Massachusetts School Building Authority

Deborah B. Goldberg
Chairman, State Treasurer

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Chief Executive Officer

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January 20, 2016

Mr. Thomas M. Guerino, Town Administrator
Bourne Town Hall
24 Perry Avenue, Room 101
Bourne, MA 02532-3441

Re: Town of Bourne, James F. Peebles Elementary School

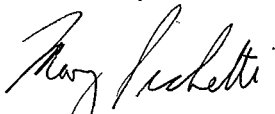
Dear Mr. Guerino:

The Massachusetts School Building Authority (the "MSBA") is forwarding review comments for the Module 3 Feasibility Study Preliminary Design Program (the "PDP") submission for the James F. Peebles Elementary School project in the Town of Bourne, received by the MSBA on December 21, 2015.

Responses to the attached comments shall be forwarded to the assigned Project Coordinator, Katie DeCristofaro (Kathryn.DeCristofaro@MassSchoolBuildings.org), through the Owner's Project Manager. Please review and return responses within 14 days of receipt of this letter.

If you have any questions or comments, please do not hesitate to contact Christina Forde (Christina.Forde@MassSchoolBuildings.org).

Sincerely,



Mary Pichetti
Director of Capital Planning

Attachments:
Module 3 PDP Review Comments
Appendix 1 – Special Education Facilities Requirements

Page 2

January 20, 2016

Peebles Elementary School PDP Review Comments

Cc: Legislative Delegation
Stephen F. Mealy, Chair, Bourne Board of Selectmen
Christopher Hyldburg, Chair, Bourne School Committee
Steven Lamarche, Superintendent, Bourne Public Schools
Edward Donoghue, Director of Business Services, Bourne Public Schools
James Potter, Chair, Bourne School Building Committee
Joel Seeley, Owner's Project Manager, Symmes Maini & McKee Associates
Kent Kovacs, Designer, Flansburgh Associates
File: 10.2 Letters (Region 6)

Module 3 Preliminary Design Program Review Comments

District: Town of Bourne

School: James F. Peebles Elementary School

Submittal Due Date: February 11, 2016

Submittal Received Date: December 21, 2015

Review Date: December 21, 2015 – January 12, 2016

Reviewed by: C. Forde, C. Alles, J. Jumpe

MSBA REVIEW COMMENTS:

The following comments¹ on the Preliminary Design Program submittal are issued pursuant to a review of the project submittal document for the James F. Peebles Elementary School presented as a part of the Feasibility Study submission in accordance with the MSBA Module 3 Guidelines, as produced by Flansburgh Associates, Inc., and its consultants. Certain supplemental components from the Owner's Project Manager (OPM) – Symmes Maini & McKee Associates are included.

3.1 Preliminary Design Program

Preliminary Design Program shall include the following:

- OPM certification of completeness & conformity – *Complete. No additional comments.*
- Table of Contents – *Complete. No additional comments.*
- Introduction – *Complete. Refer to comments shown in italics.*
- Educational Program – *Incomplete. Refer to comments shown in italics and reference the Educational Program email dated 1/19/2016.*
- Initial Space Summary – *Complete. Refer to comments shown in italics.*
- Evaluation of Existing Conditions – *Complete. Refer to comments shown in italics.*
- Site Development Requirements – *Complete. Refer to comments shown in italics.*
- Preliminary Evaluation of Alternatives – *Complete. Refer to comments shown in italics.*
- Local Actions and Approvals Certification(s) – *Incomplete. Refer to comments shown in italics.*
- Appendices – *Complete. Refer to comments shown in italics.*

3.1.1 Introduction

- Brief summary of the Facility Deficiencies (and Current S.O.I., located in the Appendix) – *Provided, please see comments below in Section 3.1.8.*

¹ The written comments provided by the MSBA are solely for purposes of determining whether the submittal documents, analysis process, proposed planning concept and any other design documents submitted for MSBA review appear consistent with the MSBA's guidelines and requirements, and are not for the purpose of determining whether the proposed design and its process may meet any legal requirements imposed by federal, state or local law, including, but not limited to, zoning ordinances and by-laws, environmental regulations, building codes, sanitary codes, safety codes and public procurement laws or for the purpose of determining whether the proposed design and process meet any applicable professional standard of care or any other standard of care. Project designers are obligated to implement detailed planning and technical review procedures to effect coordination of design criteria, buildability, and technical adequacy of project concepts. Each city, town and regional school district shall be solely responsible for ensuring that its project development concepts comply with all applicable provisions of federal, state, and local law. The MSBA recommends that each city, town and regional school district have its legal counsel review its development process and subsequent bid documents to ensure that it is in compliance with all provisions of federal, state and local law, prior to bidding. The MSBA shall not be responsible for any legal fees or costs of any kind that may be incurred by a city, town or regional school district in relation to MSBA requirements or the preparation and review of the project's planning process or plans and specifications.

- Date of invitation to conduct a Feasibility Study (and MSBA Board Action Letter, located in the Appendix) – *Provided with no further review comments.*
- Executed Design Enrollment Certification (located in the Appendix) – *Provided with no further review comments.*
- Narrative summary of the Capital Budget Statement and Target Budget for the proposed project – *Provided with no further review comments.*
- Project Directory with contact information – *Provided with no further review comments.*
- Updated Project Schedule – *Provided. The District is targeting the May 25, 2016 MSBA Board of Directors meeting for Preferred Schematic approval; and the September 28, 2016 MSBA Board of Directors meeting for Project Scope and Budget approval. Please incorporate twenty-one (21) days for the MSBA to review submittals, and fourteen (14) days for the District to respond to the MSBA’s review comments into the Project Schedule.*

3.1.2 Educational Program

Summary and description of the existing educational program, and the new or expanded educational vision, specifications, process, teaching philosophy statement, as well as the District’s curriculum goals and objectives of the program. Include description of the following:

- *Provide two copies of an updated Educational Program that addresses the items below; one copy that indicates changes made to the original submittal, and a second “clean copy” that documents the Educational Program to inform the feasibility study and design of the proposed project.*
- *The Educational Program was found to be inadequate in detail. The Educational Program either provided no information or a summary level description of the fields below without providing the necessary depth associated with certain programs, the educational rationale for the programs, or how the educational requirements relate to space needs or to curriculum. Please provide a detailed narrative description of each program for the spaces described in the Educational Program.*
- *Grade and school configuration policies – Provided the current grade configurations for the James F. Peebles Elementary School and the Bournedale Elementary School. Please provide a more detailed narrative regarding the potential grade reconfiguration as part of the Preferred Schematic Report.*
- *District class size policies – Provided with no further review comments.*
- *School scheduling method – Provided. Please incorporate a more detailed narrative that includes the advantages and disadvantages of the current school scheduling method, and whether or not the District plans to make any changes as part of the Preferred Schematic Report.*
- *Teacher planning and professional development – Please incorporate a more detailed narrative that includes the advantages and disadvantages regarding the teacher planning, and whether or not the District plans to make any changes. In addition provide a narrative on professional development as part of the Preferred Schematic Report.*
- *Administrative and academic organization/structure (e.g., academies, departments, houses, grade based cohorts, teams, room assignment policies etc. teams, etc.) –*

Please provide additional information regarding administrative and academic organization/structure as part of the Preferred Schematic Report.

- *Student Guidance and Support Services – Not provided. Please provide a narrative as part of the Preferred Schematic Report.*
- *Teaching Methodology – This section is underdeveloped. Please provide narratives for each item listed below that explains what activities are currently provided and the type of spaces needed in order to better provide for delivery of the curriculum. In addition explain what these specific program areas require and what they might look like in a potential facility. Please note that the academic programming needs to be robust enough to inform the design and development of the potential project.*
 - *Grouping Practices – Not provided, please refer to comment listed above.*
 - *Tiered Instruction – Not provided, please refer to comment listed above.*
 - *English Language Arts/Literacy – Not provided, please refer to comment listed above.*
 - *Mathematics – Not provided, please refer to comment listed above.*
 - *Science – Not provided, please refer to comment listed above.*
 - *Social Studies – Not provided, please refer to comment listed above.*
 - *World Languages – Not provided. Please indicate if foreign language programs are offered, if so please refer to the comment listed above.*
 - *Academic support programming spaces – Not provided. Please indicate if academic support areas are needed, if so refer to comment listed above.*
 - *Visual Arts – Provided, please refer to comment listed above.*
 - *Music/Performing Arts – Provided, please refer to comment listed above.*
 - *Vocations/Technology – Provided. This space is identified as the “Innovation Lab”. Please provide more information regarding the daily use and function of this space as it is currently used and how the District intends to use it moving forward.*
 - *Media Center Library Programming – Not provided, please refer to comment listed above.*
 - *Health and Physical Education – Provided, please refer to comment listed above.*
- *Educational Technology instruction policies and program requirements (labs, in-classroom, media center, required infrastructure, etc.) – Provided. Please include the following information:*
 - *A description of the existing educational technology and a description of how it is managed by the District, including a description of how it is used in the classroom.*
 - *A description of the overall professional support and training offered to staff.*
 - *A description of the proposed educational objectives being pursued as part of the potential project.*
 - *A description of how the updated equipment and systems would be managed and maintained by the District.*
 - *A narrative that provides examples of advantages at Bournedale Elementary School (which has full Wi-Fi) and disadvantages at the James F. Peebles Elementary School.*

- Pre-kindergarten (SPED only, tuition programs, locations, full day, half day, if applicable) – *Provided with no further review comments.*
- Kindergarten (full day, half day, locations, if applicable) – *Provided with no further review comments.*
- Special Education programs (in-house, collaborative, facility restrictions) – *Provided. Please provide specific details about the programs and the space required to deliver these programs.*
 - *Please review the special education rubric included in Appendix 1 and describe where existing program and spaces align with the rubric, where they do not, and potential changes to remedy in the proposed project.*
 - *List current special education programs serving students in the proposed project including the number of special education students currently served in each program.*
 - *List deficiencies in the existing program that have been identified locally or through state review.*
 - *List specialized programs and Collaborative spaces/program located in the current school.*
 - *List proposed program and any program/service needs that the District hopes to address in the proposed project.*
 - *List programs/services that will continue.*
 - *List programs that will be eliminated.*
 - *List programs that will be added or enhanced as a result of the proposed project.*
 - *List programs or services that will be moved from within the District (from which school they are being moved) as a result of the proposed project.*
 - *Provide the date of the last Coordinated Review Program and list any issues and/or problems identified in that review.*
 - *Provide the current status and/or remedy of those issues identified as part of the review.*
 - *List specialized programs and Collaborative spaces/program that will continue, be eliminated or added as part of the proposed project.*
 - *List Special Education Day School Programs that the District currently provides or participates in, and whether the programs will continue in the proposed project.*
 - *Please indicate the design response including desired features and/or layout considerations (please incorporate into the updated Educational Program to be provided with the Preferred Schematic Report.)*
- Lunch programs (number of servings, district kitchen, full service kitchens, warming kitchens, etc.) – *The report indicates that the District currently has four lunches at the James F. Peebles Elementary School and five lunches at the Bournedale Elementary School. The MSBA guidelines are based on two seatings, please indicate how many lunches the District proposes to have moving forward and explain the District’s rationale for the proposed number of seatings, how long will lunch be provided and describe how it is coordinated into the overall schedule.*

- Security and visual access requirements – *Please confirm that first responding emergency representatives will be consulted in the planning process and associated requirements will be incorporated into the preferred solution.*
- Transportation policies – *Provided with no further review comments.*
- Functional and spatial relationships – *Please provide additional context regarding the decisions that have been made with regard to the various functional and spatial relationships.*
- Key programmatic adjacencies – *Please provide additional context regarding the decisions that have been made with regard to the various programmatic adjacencies.*

3.1.3 Initial Space Summary

- Completed MSBA space summary spreadsheet; provide one spreadsheet per approved design enrollment – *The MSBA has performed an initial review of the space summaries with the following comments below:*
 - **Study Enrollment Options:**
 - *Option 1: Grades K-4 with an enrollment of 225 students at the James F. Peebles Elementary School.*
 - *Option 2: District-wide grades PK-4 with an enrollment of 725 students (K-4) at the Bournedale Elementary School.*
 - *Option 3: District-wide grades PK-5 with an enrollment of 885 students (K-5) at the Bournedale Elementary School.*
 - *Option 4: Grades K-4 including a District-wide grade 5 with an enrollment of 410 students at the James F. Peebles Elementary School.*
 - **Core Academic** – *The MSBA notes that the District is proposing additional classrooms in Options 1 and 4 that propose a school with a utilization rate below 90%. The MSBA also notes that student populations are projected to continue to decline. Prior to the MSBA accepting the proposed variations to the guidelines for options 1 and 4 please provide in your response to these comments an analysis for Option 1 and Option 4 that demonstrates the district could not delivery its curriculum with fewer classrooms through flexible organization of spaces and potential use of one or more of the pre-kindergarten, kindergarten room as a first grade class to substantiate the long term need of the proposed additional classrooms beyond those included in the MSBA guidelines. The findings of this analysis would need to be incorporated into the final evaluation of options. Per the information provided, the following spaces will be proposed in order for the District to deliver its Educational Program:*

Anticipated Core Academic Spaces*	Option 1	Option 2	Option 3	Option 4
<i>Pre-Kindergarten</i>	N/A	4	4	N/A
<i>Kindergarten</i>	3	7	7	3
<i>General Classrooms</i>	12	28	35	19
MSBA Comments	<i>Proposes one (1) additional Kindergarten classroom and three (3) additional general classrooms in excess of the guidelines.</i>	<i>Proposes four (4) additional Pre-Kindergarten classrooms; one (1) additional Kindergarten classroom; and two (2) additional general classrooms in excess of the guidelines.</i>	<i>Proposes four (4) additional Pre-Kindergarten classrooms and four (4) additional general classrooms in excess of the guidelines.</i>	<i>Proposes four (4) additional general classrooms in excess of the guidelines.</i>

* Please provide proposed scheduling information specific to these spaces.

- **Special Education** – The MSBA notes that the proposed square footage to deliver the District’s Special Education program aligns with the MSBA guidelines for each option. Please note that the Special Education program is subject to approval by the Department of Elementary and Secondary Education (“DESE”). The District should provide this information for this submittal with the Schematic Design Submittal. Formal approval of the District’s proposed Special Education program by the DESE is a prerequisite for executing a Project Funding Agreement with the MSBA.
- **Art & Music** – The overall proposed square footage for this category is below the MSBA guidelines for each option. Please verify that the proposed square footage is sufficient to deliver the District’s programmatic needs in the Preferred Schematic Report.
- **Health & Physical Education** – The overall proposed square footage for this category aligns with the MSBA guidelines for each option. No further preliminary comments.
- **Media Center** – The proposed programmatic spaces aligns with MSBA guidelines for each option. No further preliminary comments.
- **Dining & Food Service** – The proposed programmatic spaces align with MSBA guidelines for options 1 and 4; and exceed the MSBA guidelines for options 2 and 3, because of the reuse of the existing cafeteria. No further preliminary comments.
- **Medical** – The proposed spaces aligns with the MSBA guidelines for each option. No further preliminary comments.
- **Administration & Guidance** – The proposed spaces aligns with the MSBA guidelines for each option. No further preliminary comments.
- **Custodial & Maintenance** – The proposed spaces aligns with the MSBA guidelines for each option. No further preliminary comments.

- **Other** –*The proposed space exceeds the MSBA guidelines for each option because of the addition of a 1,000 nsf Innovation Lab. The MSBA will evaluate this variation to the guidelines based on review of the District’s updated Educational Program.*

Please note that upon selection of a preferred solution, the District may be required to adjust spaces/square footage that exceed the MSBA guidelines and is not supported by the Educational Program provided.

- Floor plans of the existing facility – *Provided with no further review comments.*
- Narrative description of reasons for all variances (if any) between proposed net and gross areas as compared to MSBA guidelines – *Provided. Refer to detailed comments for each category above.*

3.1.4 Evaluation of Existing Conditions

- Confirmation of legal title to the property – *Provided with no further review comments.*
- Determination that the property is available for development – *Provided with no further review comments.*
- Existing historically significant features and any related effect on the project design and/or schedule – *Provided. The District submitted Project Notification Forms (PNF) to the Massachusetts Historical Commission (“MHC”) on November 18, 2015, and obtained MHC approval on December 14, 2015 for the James F. Peebles Elementary School and the Bournedale Elementary School.*
- Determination of any development restrictions that may apply – *Provided with no further review comments.*
- Initial Evaluation of building code compliance for the existing facility – *Provided with no further review comments.*
- Initial Evaluation of Architectural Access Board rules and regulations and their application to a potential project – *Provided with no further review comments.*
- Preliminary evaluation of significant structural, environmental, geotechnical, or other physical conditions that may impact the cost and evaluations of alternatives – *Provided with no further review comments.*
- Determination for need and schedule for soils exploration and geotechnical evaluation – *Provided with no further review comments.*
- Environmental site assessments minimally consisting of a Phase I: Initial Site Investigation performed by a licensed site professional – *Provided with no further review comments.*
- Assessment of the school for the presence of hazardous materials – *Provided. It should be noted that all costs associated with the removal of asbestos containing floor and ceiling tiles are categorically ineligible for MSBA reimbursement.*
- Previous existing building and/or site reports, studies, drawings, etc. provided by the district, if any – *Provided with no further review comments.*

3.1.5 Site Development Requirements

- Narrative describing project requirements related to site development to be considered during the preliminary and final evaluation of alternatives – *Provided. The*

narrative is a summary of site access and circulation; parking and paving; utilities; outdoor play and educational spaces; and site limitations.

- Existing site plan(s) including the following features:
 - Structures and fences – *Provided with no further review comments.*
 - Site access and circulation – *Not explicitly shown on plans, please identify existing bus and parent drop-off/pick-up locations as well as vehicular and pedestrian circulation in the Preferred Schematic Report.*
 - Parking and paving – *Provided with no further review comments.*
 - Code requirements – *Not specifically indicated. Please provide as part of the Preferred Schematic Report.*
 - Zoning setbacks and limitations – *Provided with no further review comments.*
 - Accessibility requirements – *Not explicitly shown on plans. Please identify in the Preferred Schematic Report.*
 - Easements – *None indicated. Please confirm that there are no easements on site.*
 - Wetlands and/or flood restrictions – *Provided. No protectable wetland resource areas were observed on or within 100 feet of school property as outlined by Nitch Engineering for the James F. Peebles Elementary School and the Bournedale Elementary School.*
 - Emergency vehicle access – *Not explicitly shown on plans. Please identify in the Preferred Schematic Report.*
 - Safety and security requirements – *Not explicitly shown on plans. Please identify in the Preferred Schematic Report.*
 - Utilities – *Provided with no further review comments.*
 - Athletic field and outdoor educational spaces – *Provided with no further review comments.*
 - Site orientation and other location considerations – *Provided with no further review comments.*

3.1.6 Preliminary Evaluation of Alternatives

- The Preliminary Evaluation of Alternatives should include a detailed analysis of compliance with District objectives for each of the following:
 - Analysis of school District student school assignment practices and available space in other schools in the District – *Please provide information on available space in other schools in the District. In addition, for each option where a change to the existing grade configuration is proposed, please describe how and when this process will occur and the impact on the evaluation of those options. See comments below in Section 3.1.7.*
 - Tuition agreement with adjacent school districts – *Provided with no further review comments.*
 - Rental or acquisition of existing buildings that could be made available for school use – *Provided with no further review comments.*
 - Code Upgrade option that includes repair of systems and/or scope required for purposes of code compliance; with no modification of existing spaces or their function – *Provided with no further review comments.*

- Renovation(s) and/or addition(s) of varying degrees to the existing building(s) – *Five addition/renovation alternatives were preliminarily evaluated at the James F. Peebles Elementary School and the Bournedale Elementary School.*
- Construction of new building and the evaluation of potential locations – *Two new construction alternatives were preliminarily evaluated at the James F. Peebles Elementary School site.*
- *Please include an evaluation for the impacts of transportation over the canal as part of the final evaluation of options.*
- List of 3 distinct alternatives (including at least 1 renovation and/or addition option) that are recommended for further development and evaluation – *Provided. The District intends to further evaluate the following options:*
 - *Option 1: New Construction – Grades K-4 with an enrollment of 225 students at the James F. Peebles Elementary School site.*
 - *Option 2: Addition/Renovation – District-wide grades PK-4 with an enrollment of 725 students (K-4) at the Bournedale Elementary School.*
 - *Option 3: Addition/Renovation – District-wide grades PK-5 with an enrollment of 885 students (K-5) at the Bournedale Elementary School.*
 - *Option 4: New Construction – Grades K-5 with an enrollment of 410 students at the James F. Peebles Elementary School site. This option maintains the current K-4 grade configuration with the addition of a District-wide grade 5.*

3.1.7 Local Actions and Approval to include:

- Certified copies of the School Building Committee meeting notes showing specific submittal approval vote language and voting results, and a list of associated School Building Committee meeting dates, agenda, attendees and description of the presentation materials – *Provided with no further review comments.*
- Signed Local Actions and Approvals Certification(s):
 - Submittal approval certificate – *Provided with no further review comments.*
 - Grade reconfiguration and/or redistricting approval certificate (if applicable) – *Not provided. Please provide as part of the Preferred Schematic Report.*
- Provide the following to document approval and public notification of school configuration changes associated with the proposed project – *The items listed below have not been incorporated in the submittal. Please provide as part of the Preferred Schematic Report.*
 - *A description of the local process required to authorize a change to the existing grade configuration or redistricting in the District.*
 - *A list of associated public meeting dates, agenda, attendees and description of the presentation materials.*
 - *Certified copies of the governing body (e.g. School Building Committee) meeting notes showing specific grade reconfiguration and/or redistricting, vote language, and voting results if required locally.*
 - *A certification from the Superintendent stating the District’s intent to implement a grade configuration or consolidate schools, as applicable. The certification must be signed by the Chief Executive Officer, Superintendent of Schools, and Chair of the School Committee.*

3.1.8 Appendix:

- Current Statement of Interest – *Please provide the 2014 Statement of Interest (SOI), the submission included the District’s 2012 SOI.*
- MSBA Board Action Letter including the invitation to conduct a Feasibility Study – *Provided with no further review comments.*
- Design Enrollment Certification – *Provided. Please note once the District has selected a preferred solution they will need to provide the MSBA with an updated Design Enrollment Certification.*

Appendix 1

Questions to Ask When Reviewing Facilities for Students on IEPs

Question	Yes/No or Comment
Ensuring Access	
1. Do the facilities and classrooms for eligible students maximize their inclusion into the life of the school?	
2. Do all eligible students have access to school facilities including, but not limited to, those areas necessary to implement the student's IEP?	
3. Are resource rooms and separate classrooms for students with disabilities given the same priority as general education programs for access to and use of instructional and other space in public schools?	
4. Is the school providing whatever equipment and making whatever physical adaptations are necessary, including acoustical and lighting treatments to remove physical communication barriers for students who are visually impaired, deaf, or hard of hearing?	
Ensuring Equality	
5. Are the facilities and classrooms serving only students with disabilities at least equal in all physical respects to the average standards of general education facilities and classrooms?	
Minimizing Stigmatization	
6. Specifically, does the plan place a classroom serving only older students with disabilities in a part of the school building in which all the classrooms are occupied by elementary school students? Vice versa? (if yes, it's a violation)	
7. Does the plan place all, or a significant proportion, of special education facilities together in one part of a school building? (if yes, it's a violation)	
8. During a school construction project, is the plan to move classrooms of students with disabilities to locations apart from the general education program? (if yes, it's a violation)	
9. Is the plan to place a sign saying "special class" or "resource room" on the front of a substantially separate classroom? (if yes, it's a violation)	

Appendix 1

State Regulations

603 CMR 28.03(1)(b)

(b) **Facilities.** The school district shall provide facilities and classrooms for eligible students to maximize the inclusion of such students into the life of the school. Facilities and classrooms serving only students with disabilities shall be at least equal in all physical respects to the average standards of general education facilities and classrooms. Resource rooms and separate classrooms for students with disabilities shall be given the same priority as general education programs for access to and use of instructional and other space in public schools in order to minimize the separation or stigmatization of eligible students.

1. All eligible students shall have access to school facilities including, but not limited to, those areas necessary to implement the student's IEP.
2. School districts shall provide whatever equipment and make whatever physical adaptations are necessary to comply with this provision, including acoustical and lighting treatments to remove physical communication barriers for students who are deaf or hard of hearing.
3. The Department may make unannounced inspections of facilities.
4. The following examples illustrate aspects of this requirement and shall not be construed as limiting or defining its scope:

(i) Placing a classroom serving only older students with disabilities in a part of the school building in which all the classrooms are occupied by elementary school students would violate the requirements of 603 CMR 28.03(1)(b).

(ii) Placing a sign saying "special class on the front of a substantially separate classroom would violate the requirements of 603 CMR 28.03(1)(b).

(iii) Placing all special education facilities together in one part of a school building would violate the requirements of 603 CMR 28.03(1)(b).

(iv) Moving classrooms of students with disabilities to locations apart from the general education program because of financial or construction considerations violates the requirements of 603 CMR 28.03(1)(b).

Special education facilities and classrooms – PQA review criterion #55

The school district provides facilities and classrooms for eligible students that

1. maximize the inclusion of such students into the life of the school;
2. provide accessibility in order to implement fully each student's IEP;
3. are at least equal in all physical respects to the average standards of general education facilities and classrooms;
4. are given the same priority as general education programs in the allocation of instructional and other space in public schools in order to minimize the separation or stigmatization of eligible students; and
5. are not identified by signs or other means that stigmatize such students.

Federal Requirements

Section 504 of the Rehabilitation Act of 1973