

**V.B.**

**CONNECTICUT STATE BOARD OF EDUCATION  
Hartford**

**TO BE PROPOSED:**

May 4, 2016

**RESOLVED**, That the State Board of Education, pursuant to subsection (g) of Section 10-66bb of the Connecticut General Statutes, renews the charter of Achievement First Hartford Academy from July 1, 2016, through June 30, 2019, subject to the conditions noted in the Commissioner's May 4, 2016, memorandum to the State Board of Education, and directs the Commissioner to take the necessary action.

Approved by a vote of \_\_\_\_\_, this fourth day of May, Two Thousand Sixteen.

Signed: \_\_\_\_\_  
Dianna R. Wentzell, Secretary  
State Board of Education

**CONNECTICUT STATE BOARD OF EDUCATION**  
**Hartford**

**TO:** State Board of Education  
**FROM:** Dr. Dianna R. Wentzell, Commissioner of Education  
**DATE:** May 4, 2016  
**SUBJECT:** Renewal of State Charter – Achievement First Hartford Academy

**Introduction**

In accordance with subsection (g) of Section 10-66bb of the Connecticut General Statutes (C.G.S.), charters may be renewed, upon application, in accordance with the provisions for the granting of new charters. The State Board of Education (SBE) may renew a charter for a period of up to five years. The SBE makes renewal decisions based on evidence of the following performance standards:

1. *School Performance:* Is the school a successful model resulting in strong student outcomes and a positive school climate?
2. *Stewardship, Governance, and Management:* Is the school financially and organizationally healthy and viable?
3. *Student Population:* Is the school promoting equity by effectively attracting, enrolling, and retaining students, particularly among targeted populations?
4. *Legal Compliance:* Is the school acting in compliance with applicable laws and regulations?

The Connecticut State Department of Education (CSDE) and the SBE carefully evaluate qualitative and quantitative evidence and longitudinal data aligned to the four performance standards outlined above when making charter renewal decisions. The charter performance framework drives the CSDE’s charter school accountability systems and processes, including initial approval decisions, annual monitoring, and renewal determinations. From inception to renewal, charter schools must abide by the CSDE’s charter school accountability procedures and performance framework. Charter monitoring takes place through annual reporting, meetings, correspondence, and site visits, as appropriate. In accordance with C.G.S. § 10-66bb(g), a charter may be renewed, upon application, if the charter school has demonstrated satisfactory performance relative to the four performance standards.

**History/Background**

AFHA opened in the fall of 2008 and serves 1,063 students in Grades K-12, all from the City of Hartford. Table 1, page 7, of the attached Charter Renewal Report provides 2015-16 student enrollment and demographic data. AFHA’s mission states, in part, “...to deliver on the promise of an equal educational opportunity for all of America’s children regardless of race or economic status. The overarching goal of the school is to provide all of our students with the academic and character skills

they need to graduate from top colleges, to succeed in a competitive world, and to serve as the next generation of Hartford leaders.” To supplement student learning, AFHA has extended the school day by 1.5 hours and the school year by 2 weeks. The school offers a rigorous college preparation curriculum aligned to the Connecticut Core State Standards. All students are enrolled into the school by blind lottery conducted by the Hartford Public Schools. Through an agreement with the City of Hartford, students who reside in Hartford’s North End are given preference in the lottery. AFHA will graduate its first class in June 2016. The school projects an 83.7 percent four-year graduation rate and a 97.2 percent (35 of 36 graduating seniors) four-year college and university acceptance rate. Based on the CSDE’s review of the charter, the school is satisfactorily achieving its mission.

### **Charter Renewal Process**

*Application for Renewal of Charter:* The CSDE accepted an application for the renewal of AFHA’s charter on December 18, 2015. The application detailed the charter school’s progress, operations, and achievement in relation to the CSDE’s charter school performance standards: (a) school performance; (b) stewardship, governance, and management; (c) student population; and (d) legal compliance. AFHA submitted data and evidence to substantiate the charter school’s written responses.

A renewal team comprised of CSDE staff with expertise in curriculum, assessments, special education, school management, finance, and school governance reviewed the renewal application and requested clarification and additional information, where necessary. Overall, the team determined that the application responded effectively to the areas required and provided sufficient supporting evidence.

*Renewal Site Visit:* On January 12, 2016, the CSDE renewal team conducted an on-site visit at AFHA. The purpose of the renewal on-site visit was to observe AFHA’s programs, policies, practices, and procedures to assess their efficacy and fidelity to the school’s charter and aligned operating systems. Evidence was collected through on-site visit observations, document reviews, interviews, and focus groups. The team spoke with board members, administrators, staff, parents and community members. The team used this process to ensure that the school is functioning in compliance with the law and the school’s mission. The team verified the responses detailed in the renewal application regarding compliance with the law and the CSDE’s performance framework and accountability plan.

Additionally, the CSDE had conducted three prior on-site visits to AFHA in response to parent complaints made to the SBE. At the November 5, 2014, SBE meeting, an AFHA parent raised a number of potential issues regarding certain AFHA practices relating to the treatment of students. Responding to these claims at the direction of the SBE, CSDE staff conducted an on-site visit to AFHA on November 10, 2014.

On March 31, 2015, the CSDE issued a letter to Achievement First addressing concerns that had been raised regarding certain practices at AFHA (Attachment A). The letter required AFHA to submit a corrective action plan addressing the findings, which it submitted on April 27, 2015.

At the November 4, 2015, SBE meeting, a parent of a student enrolled at AFHA testified about ongoing issues regarding certain AFHA practices related to treatment of her child. In November and December 2015, CSDE staff conferred with the parent on several occasions and conducted two on-site visits at the school on November 17, 2015, and December 9, 2015, to investigate the matter. Specifically, the parent’s complaint addressed classroom removal for disciplinary reasons and the

inability to obtain the Family Handbook to understand disciplinary consequences. CSDE staff determined that it is difficult for parents to understand the linkage between types of behaviors and the respective disciplinary consequence for such behaviors due to ambiguity regarding AFHA discipline policies. Two areas of concern were noted: 1) lack of appropriate management oversight at the school building level to ensure proper, timely, complete, and accurate implementation of policies and procedures; and 2) lack of review and implementation of behavior/classroom management practices at the school building level.

*Invitation for Written Comment:* The CSDE solicited written comments on the renewal of AFHA from the Superintendent of Hartford and from contiguous school districts: Bloomfield, East Hartford, Newington, South Windsor, West Hartford, Wethersfield and Windsor. CSDE received no responses.

*Public Hearing:* Allan B. Taylor, Chairperson of the SBE, and CSDE staff held a public hearing on February 24, 2016, in Hartford and heard from 30 individuals on the potential charter renewal of AFHA and the impact it is having on the community. Public hearing participants included members of the AFHA community, including family members, students, school staff, and community members. Over 85 people attended the public hearing. The responses generated during the public hearing were overwhelmingly positive, both in terms of the impact the charter school has had on the community and support for AFHA in the context of school choice.

### **Site Visit Findings**

As required by law, the CSDE's renewal review focused on the following areas: (a) school performance; (b) stewardship, governance, and management; (c) student population; and (d) legal compliance. Data and information contained in the Charter Renewal Report, Spring 2016 (attached) speak to AFHA's performance and success according to these four performance standards. The report highlights school strengths and areas for continued growth. Strengths include AFHA having exceeded the state's index rate on English language arts for high needs students, Math for high need students, preparation for college and career readiness (percentage taking courses and percentage taking exams) and on-track to high school graduation. In addition, AFHA exceeded the 95% participation rate standard for the All Students and High Needs group in all tested areas. An area for continued growth includes AFHA's chronic absenteeism rate. Page 5 of the attached Charter Renewal Report shows that AFHA's chronic absenteeism rate grew from 3.4 percent in 2012-13 to 10.6 percent in 2014-15.

### **Charter Renewal Recommendations with Conditions**

Based on the CSDE's evaluation of AFHA's performance, the CSDE recommends that the SBE renew the school's charter for a period of three years subject to the following conditions:

1. By July 29, 2016, AFHA shall submit a plan to target and address chronic absenteeism by: (a) isolating the root causes of chronic absenteeism; (b) identifying interventions to target root causes; and (c) monitoring interventions and applying midcourse corrections, as necessary. The plan shall be developed in consultation with CSDE's Turnaround Office, which provides school climate training and CSDE's Office of Student Supports and Organizational Effectiveness, which provides social, emotional and behavioral training for school districts. Additionally, AFHA shall submit its year-to-date chronic absenteeism rate to the CSDE twice annually, once by September 30, 2016, via the annual reporting process and again by January 31, 2017. The CSDE will work with AFHA to establish reasonable growth targets, and AFHA must participate in relevant technical assistance organized by the CSDE.

2. CSDE staff will work with AFHA on issues highlighted in the attached renewal report receiving ratings of “Pending Action” or “Does Not Meet” through the annual report provided under C.G.S. 10-66cc.

If approved, in the 2016-17 school year AFHA will serve a projected enrollment of 1,265 students, contingent on state funding, in Grades Kindergarten through 12.

### **Notification of Probation**

While the Commissioner recommends the renewal of AFHA’s charter from July 1, 2016, through June 30, 2019, AFHA would also be placed on probation for the following reasons.

AFHA increases educational options for families in the City of Hartford; however, the school continues to be challenged by school culture, climate, and teacher certification issues. At the time of AFHA’s last charter renewal in 2013, the school was identified as having one of the highest suspension rates in the state. A condition of the 2013 charter renewal required accountability updates to enable CSDE to monitor AFHA’s discipline practices and results. CSDE also required a plan to improve climate and culture at the school, including quantitative targets for the reduction of suspensions, particularly of its youngest students, and annual reports to monitor progress. The plan submitted April 27, 2015 (Attachment B), included targets for the reduction of suspensions, policy and procedure changes, and teacher and administrator training.

The suspension data in 2013-14 (see page 5 of the attached Charter Renewal Report, Suspension Rates table) reflects a significant (38 percent) reduction in students with one or more suspensions in the previous school year. However, the suspension rate for the 2014-15 school year shows only a minor improvement when compared to the 2013-14 school year. Furthermore, AFHA’s 2014-15 suspension rate exceeds the state average and ranks among the highest in the state among the grade levels it serves. As previously noted, parent complaints were registered directly to the SBE in 2014 and 2015 regarding discipline-related matters. The school’s suspension rate coupled with previous investigations on discipline-related matters raises school climate and culture concerns, which require immediate attention and intervention by AFHA. Ongoing review by CSDE staff reveals that the school has struggled to implement policies and procedures resulting in sustained improvement of culture and climate at the school. Additionally, AFHA remains out of compliance with teacher certification requirements for Connecticut charter schools, which are set forth in Section 10-66dd of the C.G.S. Although there has been some improvement in staff certification since AFHA’s 2013 renewal, the school has not implemented remedies that have resulted in complete certification compliance. At the time of AFHA’s last charter renewal, slightly over 50 percent of staff were appropriately certified for positions held. Currently, 70 percent (80 staff members) are properly certified, whereas 30 percent (35 staff members) are out of compliance.

The probation would be effective starting May 4, 2016. C.G.S. 10-66bb(h) provides, in part, that the “Commissioner of Education may at any time place a charter school on probation if (1) the school has failed to (A) adequately demonstrate student progress, as determined by the Commissioner, (B) comply with the terms of its charter or with applicable laws and regulations,…” A three-year charter renewal accompanied by probation recognizes the need for the CSDE to maintain continued close oversight of AFHA while allowing the school to make structural program improvements to school culture and climate and certification compliance.

The Commissioner's letter of probation would include the following provisions:

1. By May 9, 2016, as required by C.G.S. § 10-66bb(h), the Commissioner shall provide written notice to AFHA of the length of and reasons for probation.
2. By June 13, 2016, AFHA shall submit a corrective action plan acceptable to the Commissioner. The corrective action plan must include measures to minimize behavioral incidents resulting in suspensions and expulsions by: (a) isolating the root causes of behavioral issues; (b) identifying interventions to target root causes; (c) strengthening school discipline policies and procedures; and (d) monitoring interventions and applying midcourse corrections, as necessary. The plan shall be developed in consultation with CSDE's Turnaround Office, which provides school climate training and CSDE's Office of Student Supports and Organizational Effectiveness, which provides social, emotional and behavioral training for school districts. AFHA shall implement the corrective actions within thirty days following the Commissioner's acceptance of the plan.
3. By June 13, 2016, AFHA shall submit a corrective action plan acceptable to the Commissioner. The corrective action plan must include a timeline for bringing staff into compliance by: (a) ensuring staff responsible for hiring clearly understand the certification requirements of each position; (b) providing a clear pathway and support to certification with established milestones and timelines; and (c) including monitoring and interventions for non-compliance. AFHA shall implement the corrective actions within thirty days following the Commissioner's acceptance of the plan.
4. By May 9, 2016, as required by C.G.S. § 10-66bb(h), the Commissioner shall notify parents and guardians of students attending the school of the probationary status and the reasons for such status.
5. By September 30, 2016, AFHA shall submit an interim report listing all staff including name, last four digits of social security number, the title of position held and the certificate or permit held. AFHA shall participate in a progress monitoring site visit facilitated by the CSDE. The content, format and method for submitting the interim report and progress data will be determined by the CSDE.
6. By January 31, 2017, AFHA shall submit an interim report listing all staff including name, last four digits of social security number, the title of position held and the certificate or permit held. AFHA shall participate in a progress monitoring site visit facilitated by the CSDE. The content, format and method for submitting the interim report and progress data will be determined by the CSDE.
7. Following the October 1, 2016, Public School Information System (PSIS) data collection, CSDE will review and monitor year-to-date number of suspensions and expulsions, and the concentration of students with one or more suspension or expulsion. Generally, this data is verified in January of the subsequent year, 2017.
8. AFHA must participate in relevant technical assistance organized by the CSDE.

9. The Commissioner will evaluate AFHA's satisfaction of the foregoing conditions and its progress toward correcting the issues of concern. Based on this evaluation, the Commissioner will determine, no later than May 3, 2017, whether to continue AFHA's probation.

No later than May 3, 2017, the Commissioner will notify the SBE regarding the removal or continuation of AFHA's probationary status.

Prepared by: Robert E. Kelly, Charter School Program Manager  
Bureau of Choice Programs

Reviewed by: Mark Linabury, Chief  
Bureau of Choice Programs



## CHARTER RENEWAL REPORT | SPRING 2016

Charter School Information:		
Charter School Name:	Achievement First Hartford Academy	
School Directors:	Ernest Peterson, Elementary School, Sorbrique Grant, Middle School, Benjamin Cruse, Summit Middle School, Emily Banks, High School	
School Board Chairperson:	John Motley	
Location (City/Town):	Hartford	
Rating Key:		
<b>Meets</b>	The school demonstrates effective policies and practices, resulting in positive outcomes.	
<b>Pending Action</b>	The school requires minor modifications to its policies and/or practices. The school is taking satisfactory measures to remedy and address these issues in a timely manner.	
<b>Does Not Meet</b>	The schools falls below performance expectations with significant concerns noted, which require immediate attention and intervention.	
Standard 1: School Performance Indicators	Points/Max	% Points Earned
1.1. Academic Achievement (a. All Student, b. High Needs)	a. 207.8/300 b. 207.8/300	a. 69.3 b. 69.3
1.2. Academic Growth (a. All Student, b. High Needs)	N/A	N/A
1.3. Participation Rates (a. All Student, b. High Needs)	N/A	N/A
1.4. Attendance/Chronic Absenteeism (a. All Student, b. High Needs)	a. 38.8/50 b. 38.8/50	a. 77.6 b. 77.5
1.5. Preparation for College and Career Readiness - Courses	50.0/50	100
1.6. Preparation for College and Career Readiness - Exams	28.0/50	55.9
1.7. Graduation- (On track in Grade 9)	48.1/50	96.3
1.8. Four Year Adjusted Cohort Graduation Rate (All Students)	N/A	N/A
1.9. Six Year Adjusted Cohort Graduation Rate (High Needs)	N/A	N/A
1.10. Postsecondary Entrance	N/A	N/A
1.11. Physical Fitness	13.2/50	26.4
1.12. Arts Access	34.1/50	68.1
Accountability Index:	666.6	70.2%
A school classification of: <b>Category 1 or Category 2 = Meets, Category 3 = Pending Action, Category 4-5 = Does Not Meet.</b>		
<b>Notes and Evidence:</b>		
<p>Note: all calculations are performed using unrounded values. Rounded values are displayed. The total percentage of points earned is calculated by dividing the total points earned across all indicators by the maximum possible points. As the CSDE is implementing an accountability “pause” in 2015-16, AFHA will retain its prior school classification of Progressing, which places it in the Meets category. The overall performance of AFHA in the new accountability system is below average when compared to the accountability index score for state schools is 76.1%.</p>		



# Next Generation Accountability Report, 2014-15

## DETAILS

Choose a District

Achievement First Hartford Academy Inc. District

No:	Indicator	Index/ Rate	Target	Points Earned	Max Points	% Points Earned	State Avg Index/Rate
1a.	ELA Performance Index – All Students	61.5	75	82.0	100	82.0	67.9
1b.	ELA Performance Index – High Needs Students	61.5	75	82.0	100	82.0	56.7
1c.	Math Performance Index – All Students	52.2	75	69.7	100	69.7	59.3
1d.	Math Performance Index – High Needs Students	52.2	75	69.7	100	69.7	47.8
1e.	Science Performance Index – All Students	42.2	75	56.2	100	56.2	56.5
1f.	Science Performance Index – High Needs Students	42.2	75	56.2	100	56.2	45.9
4a.	Chronic Absenteeism – All Students	10.6%	<=5%	38.8	50	77.6	10.6%
4b.	Chronic Absenteeism – High Needs Students	10.6%	<=5%	38.8	50	77.5	17.3%
5	Preparation for CCR – % taking courses	77.4%	75%	50.0	50	100.0	66.1%
6	Preparation for CCR – % passing exams	41.9%	75%	28.0	50	55.9	37.3%
7	On-track to High School Graduation	90.5%	94%	48.1	50	96.3	85.6%
8	4-year Graduation All Students (2014 Cohort)	N/A	94%	0.0	0	0.0	87.0%
9	6-year Graduation - High Needs Students (2012 Cohort)	N/A	94%	0.0	0	0.0	77.6%
10	Postsecondary Entrance (Class of 2014)	N/A	75%	0.0	0	0.0	72.8%
11	Physical Fitness (estimated part rate) and (fitness rate)	89.0%   39.6%	75%	13.2	50	26.4	87.6%   51.0%
12	Arts Access	40.9%	60%	34.1	50	68.1	45.7%
<b>Accountability Index</b>				<b>666.6</b>	<b>950</b>	<b>70.2</b>	

These statistics are the first results from Connecticut's Next Generation Accountability Model for districts and schools. For detailed information and resources about every indicator including the rationale for its inclusion, the methodology used as well as links to resources, research, and evidence-based strategies, please see the document titled Using Accountability Results to Guide Improvement.

This model is the direct result of an extensive consultation process over a two year period. The CSDE sought feedback from district and school leaders, Connecticut educators, state and national experts, CSDE staff, and many others. This model was outlined in Connecticut's flexibility application to the U.S. Department of Education and formally approved by the USED in August 2015.

Gap Indicators	Non-High Needs Rate*	High Needs Rate	Size of Gap	State Gap Mean + 1 Stdev**	Is Gap an Outlier?
Achievement Gap Size Outlier?					N
ELA Performance Index Gap	N/A	61.5	N/A	17.3	
Math Performance Index Gap	N/A	52.2	N/A	19.6	
Science Performance Index Gap	N/A	42.2	N/A	17.2	
Graduation Rate Gap (2012 Cohort)	N/A	N/A	N/A	N/A	N

\*If the Non-High Needs Rate exceeds the ultimate target (75% for Performance Index and 94% for graduation rate), then the ultimate target is displayed and used for gap calculations. \*\*If size of gap exceeds the state mean gap plus one standard deviation, then the gap is an outlier.

Participation Rate	Rate
ELA – All Students	99.5%
ELA – High Needs Students	99.5%
Math – All Students	99.3%
Math – High Needs Students	99.3%
Science – All Students	98.4%
Science – High Needs Students	98.4%

Standard 2: Stewardship, Governance, and Management Indicators:	Rating
2.1. Fiscal Management	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
2.2. Financial Reporting and Compliance	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
2.3. Financial Viability	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
2.4. Governance and Management	<input type="checkbox"/> M <input checked="" type="checkbox"/> PA <input type="checkbox"/> DNM
2.5. School Facility	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
<b>Notes and Evidence:</b>	
<ul style="list-style-type: none"> <li>• <b>Indicator 2.1:</b> AFHA’s certified financial audit uncovered no significant findings and conditions or significant internal control weakness.</li> <li>• <b>Indicator 2.2:</b> AFHA has completed on-time submission of certified audits and annual budgets. AFHA required greater delineation of financial policies and procedures, including processes for reviewing, approving, and reconciling bank and credit card statements; purchasing procedures and thresholds. The CSDE has received revised financial policies and procedures from AFHA.</li> <li>• <b>Indicator 2.3:</b> AFHA’s debt to asset ratio (total liabilities / total assets), current asset ratio (current assets / current liabilities) and days of unrestricted cash (unrestricted cash / ((total expenditures – depreciation) / 365)) meets or exceeds the ranges recommended by the National Association of Charter School Authorizers (NACSA), signifying overall financial health.</li> <li>• <b>Indicator 2.4:</b> AFHA has recently updated policies and bylaws to comply with new CSDE administrative oversight guidelines (e.g., anti-nepotism, conflict of interest, background checks and open board meeting postings). AFHA maintains appropriate managerial procedures (e.g., checking account and payroll). AFHA’s Board appointed 5 new members at its February 29, 2016, meeting including required parent and teacher representatives. The background checks for the new board members were initiated by April 29, 2016. AFHA required amendments to its contract for whole school management services in compliance with Sections 10-66tt and 10-66uu of the Connecticut General Statutes (C.G.S.). CSDE received AFHA’s revised CMO contract on March 1, 2016. The State Board of Education will vote on its approval.</li> <li>• <b>Indicator 2.5:</b> AFHA has a safe and well-maintained school facility to support quality teaching and learning.</li> </ul>	
Standard 3: Student Population Indicators	Rating
3.1. Recruitment and Enrollment Process	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
3.2. Waitlist and Enrollment Data	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
3.3. Demographic Representation	<input type="checkbox"/> M <input checked="" type="checkbox"/> PA <input type="checkbox"/> DNM
3.4. Transfer/Retention Rates	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
3.5. Family and Community Support	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
3.6. School Culture and Climate	<input type="checkbox"/> M <input type="checkbox"/> PA <input checked="" type="checkbox"/> DNM
<b>Notes and Evidence:</b>	

- **Indicator 3.1:** AFHA currently serves 1,063 Hartford students in Kindergarten through Grade 12. All students are admitted through a blind lottery conducted by Hartford Public Schools. As AFHA aims to serve students who have historically been underserved the school is purposefully located in and enrolls students from Hartford's North End. AFHA holds open houses and information sessions at the school and participates in Hartford's city-wide school choice fair providing families opportunities to learn more about the school. Recruitment efforts among non-English language speaking families in Hartford's South End have increased and will continue. Also, the recruitment efforts among students with disabilities have increased and will continue.
- **Indicator 3.2:** AFHA maintains a sizable waitlist of families beyond the available number of seats. In 2015-16, 139 students were on the waiting list. The waitlist has included over 130 students each year for the past 3 years. The October 2015 student enrollment (1,063) is 95% of the 2015-16 projected student enrollment (1,120).
- **Indicator 3.3:** Students from minority groups represent 99.9% of AFHA's student population and 100% of students qualify for free and reduced-price meals. The percentage of special education students at AFHA is 10.9% compared to 18.4% in Hartford Public Schools (HPS), the host district. The percentage of English learners is 5% compared to 17.9% in HPS. It will be important for AFHA to continue in its efforts to attract enroll and retain English learners and students with disabilities. CSDE staff will work with AFHA on issues noted above through the annual report provided under C.G.S. 10-66cc.
- **Indicator 3.4:** During the 2014-15 school year, 68 students transferred out of the school during the course of the school year, and 117 students chose not to re-enroll for the next grade offered at the school. The rates of transfer are similar to those in the 2013-14 school year.
- **Indicator 3.5:** AFHA demonstrates strong community support, as evidenced by the sizable waitlist, attendance and testimony at the recent renewal hearing, and parent satisfaction expressed to CSDE staff in parent interviews conducted during the renewal site visit to AFHA. 88 individuals attended the February 24, 2016, renewal public hearing, and 30 individuals offered testimony supporting the school's efforts and the renewal of its charter. While the school offers frequent and meaningful opportunities for family and community involvement, parent and teacher interviews held during the renewal site visit revealed that parent participation at these events are generally low. AFHA may benefit from targeted strategies to improve parent and community involvement in school sponsored activities.
- **Indicator 3.6:** At the time of AFHA's last renewal, spring 2013, the school was identified as having one of the highest suspension rates in the state. A condition of the renewal required the creation of an accountability program to enable the CSDE to monitor AFHA's discipline practices and results. Also included was the submission of a plan to improve climate and culture at the school, including quantitative targets for the reduction of suspensions, particularly of its youngest students, and annual reports to monitor progress. The plan submitted April 27, 2014, included targets for the reduction of suspensions, policy and procedure changes and teacher and administrator training. In its plan, Achievement First takes responsibility for the gap in school site implementation of policies and procedures. At the November 4, 2015, SBE meeting, a parent of a student enrolled at AFHA testified about ongoing issues regarding certain AFHA practices related to treatment of her child. In November and December, CSDE staff conducted two on-site visits at the school on November 17, 2015, and December 9, 2015, to investigate the matter. Specifically, the complaint addressed classroom removal for disciplinary reasons and the inability to obtain the Family Handbook to understand disciplinary consequences. CSDE staff determined that is difficult for parents to understand the linkage between types of behaviors and the respective disciplinary consequence for such behaviors, due to ambiguity regarding AFHA discipline policies. Two areas of

concern were noted: 1) Lack of appropriate management oversight at the school building level to ensure proper, timely, complete, and accurate implementation of policies and procedures; and 2) Lack of review and implementation of behavior/classroom management practices at the school building level.

The suspension data in 2013-14 (table below) reflects a significant (38 percent) reduction in students with one or more suspensions in the previous school year. However, the suspension rate for the 2014-15 school year shows minor improvement compared to the 2013-14 school year. Furthermore, AFHA's 2014-15 suspension rate exceeds the Hartford Public Schools, the state and ranks among the highest in the state in the grade levels it serves: elementary, middle and high school. The school's suspension rate raises school climate and culture concerns requiring immediate attention and intervention. Based on CSDE staff ongoing review, AFHA has struggled with fidelity to implement policies and procedures for sustained improvement of culture and climate at the school. The school will benefit from targeted strategies to further improve school culture and climate. CSDE staff will work with AFHA on issues noted above through the annual report provided under C.G.S. 10-66cc.

### Suspension Rates

Reporting District Name	2012-13 Suspension Rates	2013-14 Suspension Rates	2014-15 Suspension Rates
<b>Statewide Suspension Rates</b>	7.8	7.5	7.2
<b>Achievement First Hartford</b>	47.6	29.4	28.4

AFHA's average daily attendance rate (table below) has remained high over the last three years. However, chronic absenteeism rate has continued to grow over the same three year period from 3.4% in 2012-13 to 10.6% in 2014-15.

Performance Metric:	2012-13:	2013-14:	2014-15:
<b>Average daily attendance rate:</b>	97.1%	96.5%	96.5%
<b>Chronic absenteeism rate:</b>	3.4%	6.1%	10.6%

Standard 4: Legal Compliance Indicators	Rating
4.1. Open Meetings/Information Management	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
4.2. Students with Disabilities	<input type="checkbox"/> M <input checked="" type="checkbox"/> PA <input type="checkbox"/> DNM
4.3. English Learners	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
4.4. Rights of Students	<input type="checkbox"/> M <input checked="" type="checkbox"/> PA <input type="checkbox"/> DNM
4.5. Teacher/Staff Credentials	<input type="checkbox"/> M <input type="checkbox"/> PA <input checked="" type="checkbox"/> DNM
4.6. Employee Rights	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM

**Notes and Evidence:**

- Indicator 4.1:** AFHA holds Governing Board meetings that are open and accessible to the public and post on the internet the schedule, agenda and minutes of such meetings. Education records and testing data are secure.
- Indicator 4.2:** Currently, 10.9% of AFHA students receive special education services under Individuals with Disabilities Education Act (IDEA). At the time of the visit there were two special education teacher vacancies at Summit Middle School and two special education administration vacancies, one at the middle school and one at the high school. AFHA administration was working to fill the positions.
- During the charter renewal site visit CSDE staff reviewed several special education student files that contained Functional Behavioral Assessments (FBAs). FBAs are evaluations used to develop individualized Behavior Intervention Plans (BIPs) for certain students where the student’s behavior is impacting learning and functioning in school. The BIP considers data from a student’s FBA and employs that data to create a plan of action toward changing and improving the student’s behavior. The FBAs are typically conducted by AFHA special education staff and occasionally by an outside vendor. Ultimately, it is the responsibility of HPS, the local education agency in which a student resides to conduct evaluations of the student though it is permissible for the responsible school district and the charter school to agree that the charter school and/or outside vendor will conduct some or all of the necessary and appropriate evaluations of the student. CSDE staff determined that the FBAs and BIPs were not high quality. AFHA reported in staff interviews that improving the quality and effectiveness of FBAs and BIPs is a priority and professional development activities are being offered to improve FBA and BIP quality. Achievement First staff is providing such professional development. CSDE recommends continuing professional development activities designed to improve the quality of FBAs and BIPs and collaboration with HPS. CSDE responded to a special education complaint filed on January 27, 2016, by a parent of a student attending AFHA. In the complaint the parent alleged that the school violated the Individuals with Disabilities Education Improvement Act (IDEA) and state law by failing to implement the student’s individualized program (IEP) and behavior intervention plan (BIP). CSDE conducted an investigation regarding the complaint and determined there were no denial of a Free Appropriate Public Education (FAPE) and no violation of IDEA and state law. CSDE staff will work with AFHA on issues noted above through the annual report provided under C.G.S. 10-66cc.



- **Indicator 4.3:** English learners represent about 5% of AFHA’s student population. AFHA English learner policies and procedures include native language communication, proper steps for identification of students in need of EL services, exiting students from EL services and monitoring exited students.
- **Indicator 4.4:** AFHA student rights policies and procedures include admissions, handling of student information, due process protections and state nondiscrimination laws. CSDE reviewed the AFHA student handbook and identified issues in the areas of restraint and seclusion, attendance and discipline that require revision. AFHA’s Board has directed the school to make the required policy and procedure changes. The school will distribute the updated student handbook to all families prior to the start of the 2016-17 school year. CSDE staff will work with AFHA on issues noted above through the annual report provided under C.G.S. 10-66cc.
- **Indicator 4.5:** Although there has been some improvement in staff certification since AFHA’s last renewal, the school board has not instituted remedies that have resulted in sufficient movement toward certification compliance. At the time of AFHA’s last renewal slightly over 50% of staff were appropriately certified for the positions held. Currently, 70% or a total of 80 staff are properly certified, 30% or 35 staff are out of compliance. CSDE staff will work with AFHA on issues noted above through the annual report provided under C.G.S. 10-66cc
- **Indicator 4.6:** AFHA employee policies and procedures are in compliance with all applicable state and federal laws.

<b>Prepared by:</b>	<b>Approved by:</b>
Robert Kelly, Charter School Program Manager	Mark Linabury, Bureau Chief of Choice Programs



## ACHIEVEMENT FIRST HARTFORD ACADEMY DATA

<b>Table 1. 2015-16 Student Enrollment and Demographic Information</b>	
Grades served:	K-12
Total enrollment:	1,063
Percentage of students qualifying for free or reduced price meals:	100%
Percentage of special education students:	10.9%
Percentage of students with limited English proficiency:	5%
Percentage of minority students:	99.9%
Percentage of Asian students:	.6%
Percentage of Black students:	79.7%
Percentage of Hispanic students:	19.6%
Percentage of Caucasian students:	0.1%

<b>Table 2: School Culture and Climate Data</b>			
<b>Performance Metric:</b>	<b>2012-13:</b>	<b>2013-14:</b>	<b>2014-15:</b>
Average daily attendance rate:	97.1%	96.5%	95.6%
Chronic absenteeism rate:	3.4%	6.1%	10.6%
Number of in-school suspensions:	1,280	301	287
Number of out-of-school suspensions:	1,678	825	759
Suspension rate (% students with 1+ suspension):	47.6%	29.4%	28.4%
Number of expulsions:	*	0	*
Cohort graduation rate (if applicable):	N/A	N/A	N/A
Six Year Adjusted Cohort Graduation Rate (if applicable)	N/A	N/A	N/A

\*N<=5. Suppressed to protect student confidentiality.

<b>Table 3: Student Waitlist and Mobility Information</b>			
<b>Performance Metric:</b>	<b>2012-13:</b>	<b>2013-14:</b>	<b>2014-15:</b>
Waitlist number:	252	403	259
Number of enrolled students who left during the school year:	48	64	68
Number of students who did not re-enroll the next year and had not completed the highest grade at the school:	63	109	117



**STATE OF CONNECTICUT**  
*STATE BOARD OF EDUCATION*



March 31, 2015

Ms. Dacia M. Toll  
 Co-CEO & President  
 Achievement First  
 403 James Street  
 New Haven, CT 06513

Dear Ms. Toll:

This correspondence addresses concerns that have been raised regarding certain practices at Achievement First Hartford Academy (AFHA). At the November 5, 2014, State Board of Education (SBE) meeting, an AFHA parent raised a number of potential issues regarding certain AFHA practices relating to the treatment of students. Responding to these claims at the direction of the SBE, Connecticut State Department of Education (CSDE) staff conducted a site visit to AFHA on November 10, 2014.

The CSDE staff reviewed the academic, behavioral and attendance records of Scholar A.<sup>1</sup> In addition, they reviewed policies, procedures, practices and data related to suspension, restraint and seclusion. Staff also visited rooms designated for seclusion of students identified with behavioral issues and interviewed AFHA staff. As a consequence of completing these activities, the CSDE team developed concerns as to whether systemic issues existed at AFHA regarding the claims raised.

Following the site visit, CSDE staff determined four key systemic areas of concern: 1) seclusion practices; 2) student discipline/suspension approach; 3) policies and procedures implementation; and 4) classroom/behavior management. CSDE identified AFHA staff implementation inconsistencies across these four areas. Findings in each of the four areas are delineated in the pages that follow.

The CSDE provided Achievement First leadership an opportunity to respond to the claims that have been raised. Since the time these matters were first raised before the SBE, you and your staff have provided CSDE staff with helpful contextual and explanatory information. In addition to a conference call on this matter, AFHA initiated a meeting with CSDE to further address and clarify the issues. Achievement First's regional superintendent and senior director of special services attended the meeting, which was productive in addressing the need for continued partnership between AFHA and Hartford Public Schools, since the district has responsibility if a child is considered a student at risk and/or identified as a student with a disability.

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<sup>1</sup> Scholar A was enrolled at AFHA for several months during the current school year. We understand that, as of the date of this writing, Scholar A no longer attends AFHA.

## 1. SECLUSION PRACTICES

One of the concerns raised at the November 2014 SBE meeting was that AFHA improperly used seclusion rooms<sup>2</sup> in addressing student behavior concerns. The law prohibits the use of restraint and seclusion in schools, except under certain conditions. These conditions include a response to an emergency where there is imminent risk of injury to self or others, or in limited cases, when necessary, as a behavior intervention articulated in the individualized education program (IEP)<sup>3</sup> which is developed by the planning and placement team (PPT) (Conn. Gen. Stat. § 46a-152(b)). The laws and regulations related to the use of restraint and seclusion in the public school setting are limited to students identified as “person[s] at risk,” which generally means that the student is either (1) identified as requiring special education and related services, or (2) being evaluated to determine eligibility for such services.

Once a student is placed in seclusion, schools are required to comply with recordkeeping, parental notification, and other legal requirements. See Conn. Gen. Stat. § 46a-150 et seq. and Conn. State Agency Regs. § 10-76b-5 et seq. Finally, CSDE guidance makes clear that involuntary seclusion may not be used for disciplinary purposes, and “it may not be used because it [is] convenient and it may not be used as a substitute for a less restrictive alternative.” Helpful guidance on this issue is available in the publication entitled, *Parental Notification of the Laws Relating to the use of Seclusion and Restraint in the Public Schools* (available on the CSDE Bureau of Special Education website).

Our review reveals that AFHA has not complied with state statutes and regulations regarding restraint and seclusion of at risk and identified special education students. Documentation of incidents necessitating seclusion for Scholar A did not identify behaviors that met the criteria of posing imminent risk of injury to self or others. In particular, behaviors identified that led to seclusion for Scholar A included “leaving assigned classroom,” “distracting teacher,” “sitting at teacher’s desk,” “yelling across the room” and “throwing books on carpet.” Under existing law and CSDE guidance, seclusion is not authorized for these behaviors. In addition, specific findings included noncompliance with requirements related to space used for seclusion; training of staff; maintenance of logs and documentation of incidents of restraint and seclusion; and required notification to parents.

In addition, at the time of the CSDE’s visit, inconsistent information was provided to the CSDE team regarding the use of the identified seclusion space at AFHA. Subsequent to the CSDE’s site visit to AFHA, you acknowledged that AFHA improperly created and used the seclusion room for a two-week period, and that the necessary policies, procedures and data reporting were

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<sup>2</sup> The term “seclusion” is defined to be “the confinement of a person in a room, whether alone or with staff supervision, in a manner that prevents the person from leaving...” Conn. Gen. Stat. § 46a-150(7); see Connecticut State Agency Regulations § 10-76b-5(10).

<sup>3</sup> The student’s IEP also must specify significant details about the use of seclusion, including a description of the seclusion space, permissible duration and frequency of any seclusion, and other issues. See Conn State Agency Regs. § 10-76b-8.

not in place during this time. Feedback from staff and a review of policies and procedures indicated a lack of clarity regarding the function and process for use of the reflection room, in-school suspension, seclusion, time out, and a removal from classroom instruction. Procedures for monitoring students previously placed in the seclusion space were unclear. At the time of the visit, CSDE staff indicated to administrators that the designated seclusion space viewed should not be used due to noncompliance with the regulations related to space used for seclusion, including non-conformity with applicable building code requirements as required by § 10-76b-8 of the Regulations. Additionally, as a follow-up to the visit, it was determined that AFHA is not in compliance with the CSDE requirements which necessitate schools/districts to report the use of restraint and seclusion with “at risk” students, through the on-line data submission portal.

As a result of the CSDE directive to discontinue the use of the designated seclusion space, AFHA has indicated that the room is no longer utilized as a seclusion area. Rather, the room has been repurposed as a pullout room for small academic work unrelated to behavioral-related interventions.

### Corrective Actions

On or before April 27, 2015, AFHA will provide a written attestation identifying any designated areas or spaces within the facility utilized for emergency seclusion, which indicates compliance with the Connecticut State Agency Regulations for each such space. See Conn. State Agency Regs. § 10-76b-5 et seq.

On or before April 27, 2015, AFHA will provide a written attestation and evidence identifying that all appropriate providers or assistants have received training in de-escalation strategies, physical management, and physical restraint and seclusion procedures and that the training aligns with requirements as described in the Connecticut General Statutes.

On or before April 27, 2015, AFHA will provide to the CSDE a copy of the incident reporting form used to identify incidents of emergency restraint and incidents of emergency seclusion (related to “at risk” or identified special education students) to sending LEAs and parents, as well as a statement indicating the AFHA processes and procedures for notification of parents, LEAs and required on-line reports to CSDE.

## 2. STUDENT DISCIPLINE/SUSPENSION APPROACH

The CSDE also reviewed AFHA’s practices regarding student discipline. While an exhaustive review of the law regarding student discipline is beyond the scope of this report, a brief review of the most relevant provisions is pertinent. The law defines a “removal” as “an exclusion from a classroom for all or part of a single class period,” up to 90 minutes, and provides that school policy may authorize the removal of a student from class when the student “deliberately causes a serious disruption of the educational process within the classroom.” Conn. Gen. Stat. §§ 10-233a(b) and 10-233b. The law further provides that, in the absence of an informal hearing before

the administration, a student shall not be removed from class more than six times in a school year or more than twice in one week. Conn. Gen. Stat. § 10-233b(a).

With regard to suspension, the law requires in-school rather than out-of-school suspensions, unless the administration specifically determines during a hearing that an out-of-school suspension is warranted under the circumstances.<sup>4</sup> In addition, the law places a limit on the number of suspensions that a school may impose. In particular, in the absence of a formal hearing held in accordance with the Uniform Administrative Procedure Act (UAPA), a student may not be suspended more than ten times or a total of fifty days in a school year, whichever results in fewer days of exclusion. Conn. Gen. Stat. § 10-233c(a); see Conn. Gen. Stat. § 10-233f(a) (outlining the required procedures and other requirements regarding in-school suspension).<sup>5</sup>

AFHA has grappled for some time with its handling of student discipline matters. On June 26, 2013, AFHA received a 3-year charter renewal from the SBE. Although charter renewals may be granted by the SBE for a period of up to five years, a key consideration in the SBE's three-year charter renewal decision was AFHA having one of the highest rates of suspension in Connecticut in the 2011-12 school year.

As part of the charter renewal, the CSDE required AFHA to submit a plan to improve school climate and culture at the school. CSDE approved the plan on October 22, 2013. CSDE required an interim progress report January 31, 2014. In its interim report, AFHA reported reductions of discipline violations at the school. Following the October 1, 2014, data collection, CSDE has now certified AFHA student discipline data, which is largely consistent with AFHA's interim progress report.

While there have been improvements in the total number of discipline incident counts, counts of students receiving at least one in-school suspension (ISS), out-of-school suspension (OSS) or expulsion remain considerably high at 256 in comparison with other school districts. Overall, 29 percent of AFHA students received at least one ISS, OSS or expulsion compared to the state

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<sup>4</sup> Conn. Gen. Stat. § 10-233c(g) provides in relevant part as follows:

On and after July 1, 2010, suspensions pursuant to this section shall be in-school suspensions, unless during the hearing held pursuant to subsection (a) of this section, (1) the administration determines that the pupil being suspended poses such a danger to persons or property or such a disruption of the educational process that the pupil shall be excluded from school during the period of suspension, or (2) the administration determines that an out-of-school suspension is appropriate for such pupil based on evidence of (A) previous disciplinary problems that have led to suspensions or expulsion of such pupil, and (B) efforts by the administration to address such disciplinary problems through means other than out-of-school suspension or expulsion, including positive behavioral support strategies. An in-school suspension may be served in the school that the pupil attends, or in any school building under the jurisdiction of the local or regional board of education, as determined by such board.

<sup>5</sup> Student expulsion is governed by Conn. Gen. Stat. § 10-233d. The CSDE team did not identify concerns regarding AFHA's expulsion practices during the course of the visit.

average of 7.3 percent. The suspension rate for AFHA students was 23.1 percent for elementary students, 45 percent for middle grades (6-8) and 21.1 percent for students in high school grades (9-12). The numbers reported immediately above call into question AFHA's statement of intent and its implementation of its plan to address areas of concern as indicated in its report dated January 31, 2014.

Based on the CSDE's review of AFHA's records and policies as well as interviews with staff members, significant concerns exist regarding AFHA's implementation of its discipline policies. During the site visit, for instance, CSDE noted two documented instances during a six-week period of Scholar A having been removed from class in excess of 90 minutes where such removals were not coded as suspensions.<sup>6</sup> As noted, under the law, a removal from class may not exceed 90 minutes.

Further, based on the review of the documents and discussions with staff, it is apparent that AFHA inconsistently implemented the use of in-school suspension and out-of-school suspension. Specifically, AFHA acknowledged that a parent had to accompany a child to school in lieu of a suspension. You have indicated that this was implemented by a single administrator who was not acting in accordance with established policy, and that the administrator in question is no longer employed by AFHA. As you have acknowledged, this practice imposed an unreasonable burden on parents and does not reflect the legal requirement for in-school suspensions except in certain specified circumstances as provided in Conn. Gen. Stat. § 10-233c(g). Your entire staff should be trained to prevent such violations of statute and policy.

Similarly, based on interviews with staff members and a review of student records, the CSDE also has concerns that AFHA has not fully explored alternatives to out-of-school suspension, specifically in the area of policy violations. As noted, the law requires that suspensions be served in school unless it is shown that, applying the statutory criteria, an out-of-school suspension is permissible under the circumstances. More specifically, it is not clear to the CSDE team that, in imposing an out-of-school suspension, AFHA staff consistently conducted the analysis required under the law to determine that an out-of-school suspension was warranted under the circumstances presented. See Conn. Gen. Stat. § 10-233c(g).

Based on interviews with staff members and information gathered during the site visit, the CSDE is concerned that AFHA's discipline practices may not be fully compliant with the law. It is not clear, for example, whether the school provides for a formal UAPA hearing where a student is suspended more than ten times in a given school year as is required under Conn. Gen. Stat. § 10-233c(a).

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<sup>6</sup> AFHA leadership has indicated that some of the data that the CSDE team received at the time of its site visit was incomplete or inaccurate. Although you and your staff have subsequently provided revised information, this letter relies in part on the data and other conditions that were actually observed at the time of the CSDE's site visit of November 10, 2014.

### Corrective Actions

AFHA will review its policies and procedures to ensure alignment with state and federal law. In addition, AFHA will ensure that appropriate management oversight is in place in order to ensure the proper, timely, complete and accurate implementation of all policies and procedures.

On or before April 27, 2015, AFHA will provide a written attestation that, pursuant to Conn. Gen. Stat. § 10-233c(a), UAPA hearings are held when a student is suspended more than ten times or a total of fifty days in one school year, whichever results in fewer days of exclusion. In addition, on or before April 27, 2015, AFHA shall submit to the CSDE its policy regarding such hearings.

### 3. POLICIES AND PROCEDURES IMPLEMENTATION

The CSDE team also has concerns about the degree of alignment between the family handbook and the “in-house” publication that is made available to staff members. The law requires that boards of education, and by extension charter schools, notify parents/guardians at least annually of the policies governing student conduct and school discipline. Parents/guardians must also be notified when disciplinary action is taken against a student. Conn. Gen. Stat. § 10-233e.

Based on the CSDE’s review of school policies and interviews with staff members, there is concern that policies and procedures may not be properly disseminated to parents. For example, the parent handbook does not clearly indicate to parents what offenses warrant suspension. When this question was posed to school administrators, they pointed to what was described as an “in-house” publication that provided specifics. Administrators indicated that this information was for school staff and was not available to parents. In light of these representations from AFHA staff, concerns exist that students and parents are not properly informed of the conduct that may result in disciplinary interventions.

#### Corrective Action:

On or before April 27, 2015, AFHA will provide parents/guardians with all policies and procedures regarding student discipline and provide CSDE with a written attestation of this fact.

### 4. BEHAVIOR/CLASSROOM MANAGEMENT PRACTICES

Based on information gathered during the CSDE’s site visit and in subsequent communications with AFHA staff, the CSDE team has concerns about the ability of AFHA to manage student conduct. It is notable that this has been an area of concern for AFHA for some time. For instance, the June 26, 2013, SBE charter renewal of AFHA indicated that “the number of discipline violations at the school is unacceptable, and it is important that they are reduced.” Following the SBE’s three-year charter renewal of AFHA based on management of school discipline, the school acknowledged in its August 22, 2013, follow-up report to the CSDE that

professional development for AFHA staff has been revamped to include positive classroom management.

Interviews of staff indicated, however, that behavior/classroom management need further improvement to ensure staff possess the training, preparation and strategies necessary to address various types of behaviors. This is reinforced by AFHA's acknowledgement that seclusion rooms were created to contain students whom staff deemed disruptive.

Corrective Actions:

On or before April 27, 2015, AFHA will provide a status update of its progress to implement AFHA's memo, dated August 22, 2013, regarding school culture and discipline matters.

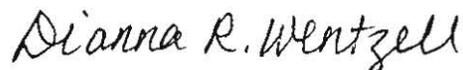
On or before April 27, 2015, AFHA will review its recent redesign of behavior/classroom management practices and monitor the implementation practices.

On or before August 31, 2015, AFHA staff shall receive training on managing student behavior.

In summary, CSDE requests a corrective action plan addressing these findings, due on or before April 27, 2015. Following receipt of the plan, CSDE will conduct monitoring visits at AFHA and provide appropriate support to ensure full implementation. In addition, CSDE requests that AFHA review its network of schools to ensure that these findings are not present in other Achievement First charter schools in the state.

The CSDE would like to thank both you and AFHA for your cooperation during this review. We look forward to supporting your efforts toward positive outcomes for all students in your schools.

Sincerely,



Dr. Dianna R. Wentzell  
Interim Commissioner of Education

DRW/mv  
cc: State Board of Education



**TO: Dr. Dianna Wentzell, Commissioner of Education**  
**CC: Connecticut State Board of Education**  
**FROM: Dacia Toll, Co-CEO and President, Achievement First**  
**DATE: April 27, 2015**  
**RE: Response to CSDE Letter - Achievement First Hartford Academy**

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**PURPOSE OF THE MEMO:**

This memorandum responds to the letter issued by Connecticut Commissioner of Education, Dr. Wentzell, dated March 31, 2015.<sup>1</sup> The purpose of this memo is three-fold: to outline the steps that we have already taken to address the four concerns raised in the letter (seclusion practices, student discipline, policies & procedures, and behavior/classroom management), to provide a status update from the memo dated August 22, 2013 regarding school culture and discipline, and to share our plans related to ongoing improvement of school culture and special education.

SECLUSION PRACTICES

At Achievement First, we do not have any designated spaces or areas throughout our buildings that serve as a space for emergency seclusion, nor is it our policy or practice to include seclusion as part of our instructional program.

- It was brought to our attention that AF Hartford Academy Elementary School created and used for 2 weeks a seclusion room earlier this fall in violation of Achievement First policies. We recognize that during this window, and as a result of being outside Achievement First policies, the necessary procedures and data reporting were not in place. At the network level, we were unaware of this school decision. Both the principal and the special services (special education) leader at AF Hartford Academy ES were new to our network and were not yet fluent in our core policies and practices. Once this concern came to light, we trained the staff on existing school policies and instructed them to cease the use of seclusion, and they did immediately. The violation of Achievement First policies was promptly addressed with responsible school staff, including instructions for corrective action. All seclusion practices stopped before the CSDE visit to AF Hartford Academy ES. The room is currently being used as a pullout room for small group academic work and related services delivery.
- At Achievement First, neither restraint nor seclusion is used to discipline a child or as a standard behavior intervention. Restraint is used extremely rarely as an emergency intervention by trained personnel to prevent immediate or imminent injury to the child or to others. Seclusion is not part of our instructional program and would only be considered in very rare cases, in alignment with all Connecticut statutes, if it was a part of a student's special education programming and included in the Individualized Education Plan (IEP) which was developed by the Planning and Placement Team (PPT). Currently, no students with IEPs who attend Achievement First schools have seclusion as part of their special education programming.
- In-school suspension and reflection/restart rooms at Achievement First schools do not serve as seclusion. A space such as a reflection room is designed as a quiet area for a brief "time out" with reflection, conversation, and sometimes skill building for a student and is a last resort to addressing a challenging behavior in the classroom. Any time out of class must be as short as possible. This practice is consistent with the definition of

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<sup>1</sup> Although the letter was in response to an incident and site visit at AF Hartford Academy Elementary School, some pieces of data noted relate to AF Hartford Academy Middle School and AF Hartford Academy High School. Whenever possible, this memo specifies the school or schools referenced in the original letter.

the restart room not being seclusion under Connecticut statute; the Parent Procedural safeguards regarding seclusion state that “seclusion does not mean any confinement of a child where the child is physically able to leave the area of confinement such as in-school suspension and time-out.”

- To date, we attest that all key members of AF Hartford Academy ES staff (behavior interventionists, paraprofessionals, and school social worker) have received training in Physical Management Techniques (emergency use of restraint) and hold current certifications. A certified trainer in Crisis Prevention Intervention will be providing training on de-escalation techniques to the behavior interventionists, paraprofessionals, school social worker, special education teachers, and dean of special services at AF Hartford Academy ES on May 8, 2015. The aforementioned trainings are in alignment with Connecticut statutes. [See Attachment A – Training and Certification Documentation.]
- Achievement First’s Restraint and Seclusion Policies and Practices are consistent with Connecticut statutes and are included in our network-wide Behavior Policy guidance, which includes forms used to identify incidents of emergency restraint and seclusion as well as process for sending information to parents and completing the on-line reporting to the CSDE. [See Attachment B – Achievement First Behavior Policy, including the relevant policy and forms on pages 29-30 and 40-43.]

#### STUDENT DISCIPLINE/SUSPENSION APPROACH

At Achievement First, we believe rigorous academic instruction and positive school culture are reliant on each other. When they are aligned and integrated, they result in incredibly effective teaching which supports student achievement. While Achievement First schools continue to be the highest performing non-magnet schools in the School District of Hartford academically (and amongst the highest-performing overall), we recognize that an area where we have not yet met expectations is with the frequency of in-school (ISS) and out-of-school suspensions (OSS). While we've made significant progress in reducing suspension rates at our schools, we still have more work to do. We attest that we will continue and improve upon our efforts: we continue to diagnose the challenge, revise and rally around our plan to address it, and keep our promise to provide an excellent education to all students. We are confident in our ability to maintain the high achievement of our schools in Hartford, while continuing to decrease suspensions.

Below are metrics comparing the 2012-2013 to 2014-2015 school years (YTD as of April 23, 2013 and April 23, 2015, respectively):

#### One or More Suspension Events:

- In 2014-2015 when comparing all AF Hartford schools, overall suspension rates (1+ event, ISS or OSS) is 24.31%, down from 42.39% in 2012-2013, a decrease of 43%.
  - ISS are down over 50% with 12% of the population having had 1+ events
  - OSS are down 31% YTD from 31.38% in 2012-2013 to 21.74% this year

#### High Incident Rates of Suspension (5+ Suspension Events):

- In 2014-2015, when comparing all AF Hartford schools, the percentage of students with high incident rates of ISS and OSS (5+ events) is down from 16.16% in 2012-2013 to 7.61%, which is a decrease of 53%.
  - High incident rates (5+ events) of ISS, are down from 8.31% in 2012-2013 to less than 1% in 2014-2015
  - High incident rates (5+ events) of OSS are down 50% YTD from 9.25% in 2012-2013 to 4.64% in 2014-2015

Additionally, over the past year, the number of OSS days/student has been cut in half among our students at AF Hartford Academy ES from 1.06 days to 0.51 days/student.<sup>2</sup>

- We have made this progress by taking several steps this school year:
  - We have developed robust guidance and training in Behavior Intervention and Positive Behavior Supports. Key members of the Culture Teams at AF Hartford schools (including principals, deans of special services, special education teachers, social workers, and behavior interventionists) attended a two-day Behavior Intervention Intensive focused on Positive Behavior Supports and Tiered Intervention on March 10-11, 2015 with the Senior Director of Special Services to build skill in providing systematically intensifying support to students struggling with behavior. [See Attachment C – Behavior Intervention PD Materials and Achievement First Behavior Intervention Guidance.]
  - We have significantly increased the amount of training and support for principals, deans of culture, and deans of special services to ensure that they have the skills to set the foundational culture of their schools. This means that school leaders are equipped to coach and support teachers so that they possess the key skills necessary to manage and influence every child in their classrooms – including students with disabilities – in order to achieve unprecedented levels of joy, engagement and learning.
  - We have partnered with the Center for Transformative Teaching to build skill with teachers and leaders in strong classroom management practices through Real Time Coaching. This program is a cutting-edge coaching method that changes teacher practice through immediate, non-disruptive feedback and guidance from coaches during classroom instruction.
  - We have collaborated with experts and high performing schools across the country through strategic partnerships to learn and employ strategies that provide the highest quality of support to our scholars and their families.
- Despite our progress, we recognize we still have more work to do and we are committed to reducing our suspension rates even further. In the 2015-2016 school year, our approach to student discipline and suspensions is multi-fold. We will continue to prioritize the previously named strategies and will also:
  - Increase the amount of onsite support and accountability for Achievement First schools – in special education and school culture, particularly at our Hartford schools – by increasing onsite skill building and teacher/leader coaching from the Network Special Education and School Culture teams.
  - Facilitate intensive training for teachers and leaders in core teacher management skills, student relationship building, behavior intervention strategies, and reparative conversations (*e.g.*, a 1:1 in classroom conversation between a teacher and a student to determine what factor(s) is holding a student back from meeting expectations.)
  - Continue to analyze classroom removals, suspension, and discipline data on a weekly basis to develop strategic, school-specific plans of action and individualized support plans for students who struggle.
- We commit to continuing to track and measure our progress in the reduction of suspensions. This data will continue to be carefully reviewed by Achievement First principals, regional superintendents, and Directors of Culture and Special Services. Overall, we aim to decrease suspension during the 2015-2016 school year by an additional 30%.

#### POLICIES AND PRACTICES IMPLEMENTATION

We believe that Achievement First's policies and procedures are fully compliant with state and federal laws. Although completely unacceptable, the incident at Achievement First Hartford Academy ES earlier this year, demonstrated that

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<sup>2</sup> In a recent review of suspension data, we observed that AF reports any in-school or out-of-school suspension (including partial-day suspensions) as a full day, whereas most other districts in Connecticut report partial days. We are reviewing state guidance and our reporting practices to ensure that we are not over-reporting the number of suspension days.

there was not a gap in Achievement First’s policies and procedures, but rather a gap in school-site implementation with new school staff. We take responsibility for this action and immediately addressed the action with the school leaders, including establishing our own internal corrective actions.

- Annually, Achievement First schools provide families with school-wide policies and procedures via the Family Handbook. This year, we attest that the Family Handbook was disseminated at AF Hartford Academy ES to all families. This document contains the school wide Code of Conduct which clearly indicates to parents what offenses warrant suspension. It does so by listing infractions for specific behaviors and the range of accompanying consequences. This document is in alignment with the network wide Behavior Policy Manual. [Attachment D – 2014-2015 AF Hartford Academy ES Family Handbook & Family Statement of Understanding.]
- Over the past twelve months, Achievement First has been working intensively with Education Compliance Services LLC to ensure that our policies and practices – particularly in the realm of special education and discipline – are in alignment with state and federal law. The attached Achievement First Behavior Policy includes our policies and practices around removal, in-school suspension, out-of-school suspension, UAPA hearings, manifestation determination reviews, etc.
- To ensure strong implementation of said policies and practice, the regional superintendent for AF Hartford Academy ES has greatly increased his onsite presence in the school, doubled the frequency of check-ins, and has provided augmented skill building to ensure strong implementation of all Achievement First policies.

#### BEHAVIOR/CLASSROOM MANAGEMENT PRACTICES

At Achievement First, we believe that is our responsibility to create and sustain focused and joyful learning environments where scholars are deeply invested in building the academic and character skills necessary for success in college and life. As we have reflected on our practice over the past few years in order to improve our programming for students, we have identified room for ongoing improvement.

- In order to change practice, we have deeply invested in training and coaching for teachers and leaders in comprehensive behavior intervention practices. These strategies provide scholars with systematically intensifying supports (such as individualized engagement strategies, increased accountability structures, and purposeful relationship building) so that students learn to respond adaptively to meet the demands of their environment with explicit skill building and positive reinforcement. The commitment to robust Tier 2 and 3 Behavior Interventions, in order to support our most at-risk students, is one of our top network priorities for the 2015-2016 school year.
- To continue to build the skills of our teachers and leaders, this spring and summer AF Hartford Academy ES will receive extensive training from Network Special Education and School Culture Teams including, but not limited to:
  - a. Implementing an Effective Child Study Team
  - b. Referral to Special Education
  - c. De-escalation, Restraint, and Seclusion Practices
  - d. Planning for High Impact Reading and Math Scientifically Researched Based Interventions
  - e. Implementing Positive Behavior Supports
  - f. Providing Accommodations for Students with Disabilities
  - g. Writing Strong Standards Aligned IEPs
  - h. Implementing the IEP
  - i. Managing Student Behavior – Strong Classroom Management Practices & Authentic Engagement Techniques
  - j. Discipline Practices for Students with Disabilities (including Manifestation Determination Review)

While there are many good things happening at AF Hartford Academy to support our scholars, including scholars with disabilities, we nevertheless remain committed to working with SDE to address and further remedy the concerns you identify. We are dedicated to keeping our promise to provide an excellent education to all students and we look forward to our ongoing partnership and collaboration with the Connecticut State Department of Education.