



STATE OF CONNECTICUT  
DEPARTMENT OF EDUCATION



**TO:** Dr. Stephen Swartzlander  
Chief Administrator  
Bradley School New London Regional

**FROM:** Colleen M. Hayles, Coordinator *cmh*  
Bureau of Special Education  
Approved Private Special Education Programs

**DATE:** March 2, 2018

**SUBJECT:** PRELIMINARY EVALUATION REPORT  
Approval Review of a Private Special Education Program

On February 6, 2018, an evaluation team visited Bradley School New London Regional (Bradley School) special education program in order to conduct an on-site review for continuous approval from the Connecticut State Department of Education. The team consisted of:

- Colleen Hayles, Coordinator, Bureau of Special Education (BSE);
- Shawn Cyr, Education Director, Natchaug Hospital Journey School; and
- Lois Pernice, Director of Special Services, Weston Public Schools.

During the on-site visit on January 9, 2018, Colleen Hayles reviewed the education files of three students and three personnel files. In addition, Ms. Hayles reviewed the application binder of materials submitted to the BSE by Bradley School administration.

At the exit conference on February 6, 2018, Ms. Hayles and the team shared its impressions and preliminary findings. The following areas of the special education program have been reviewed:

- governance;
- administration;
- fiscal management;
- admissions;
- individual student records;
- program requirements;
- evaluation of student progress and reporting responsibilities;
- student management techniques;
- qualifications and requirements for instructional, administrative, and support personnel;
- health and safety; and
- termination of enrollment.

1. **Commendations:**

- Bradley School provides educational, behavioral, and therapeutic supports to students placed within an environment that affords a schoolwide behavior support program, as well as, more individualized strategies and supports appropriate for the needs of students throughout their day.
- The model implemented in the provision of therapeutic supports centers around the integrated provision of “support within the moment,” providing students with efficient and timely opportunities to address their social, emotional, and/or behavioral needs with the available mental health professionals.
- The program strives to maintain a high level of rigor in the provision of academic instruction, which meets the varied academic needs of the students enrolled through direct instruction as well as online learning.
- Staff work as a team to collect, analyze, and utilize data to drive academic instruction, monitor student progress, and develop and address behaviors that interfere with the student’s ability to access the curriculum.
- The program appears to provide ample staffing to appropriately support students while maintaining the goal of increasing a student’s independence, ability to self-regulate, and achieve the goal of returning to a less restrictive educational setting.
- Communication among staff is positively supported through weekly team meetings held with the educational, behavioral, and clinical staff. These weekly team meetings allow staff to discuss individualized education program (IEP) goals and behavioral progress and to facilitate informed and coordinated activities by staff.
- Students earn positive incentives in response to appropriate behaviors and academic productivity.
- While the point system implemented throughout the program allows staff to identify inappropriate or unacceptable behavior by the removal of points from a baseline, students are given the opportunity throughout their day to earn back points by engaging in a “challenge” or receive credits that transfer into “Bradley Bucks” and used in the school store.
- The leadership team at Bradley School New London Regional, which includes the director of education for all Lifespan School Solutions programs, the director of education at Bradley School New London Regional and the senior teachers, meets monthly. The purpose of this leadership team meeting is to review current educational issues, discuss program initiatives, examine data, and work as a team to maintain a focus on sustaining rigor and appropriate content of academic instruction within the program.

- The program implements several social/emotional and behavioral intervention approaches to support students' academic and social/emotional development and has a focus on de-escalation of problematic situations.
- In an effort to reduce behavioral incidents requiring an emergency response such as a restraint or a seclusion, the program has taken proactive steps to enhance positive behavior supports that are available to all students throughout the program (i.e., student of the month, monthly character traits, and bus bucks to reinforce appropriate bus behavior and the use of positive language throughout various levels of intervention). In addition, students benefit from individually tailored positive behavior support plans, a reinforcement-based system within a highly structured predictable environment, frequent coaching and instruction to support social emotional growth, and the development of appropriate social skills.
- The program has significantly increased the availability of technology to staff and students.

## 2. **Standard Deficiencies:**

The following standard deficiencies must be rectified:

**Standard F: Program Requirements** - A private facility shall have a written description for each student's IEP and include as appropriate a behavior intervention plan (BIP); the student success plan; the language and communication plan; and transition goals and objectives that move the student toward college or career readiness including opportunities to work and interact in the community, and shall have a written curriculum, sufficient instructional materials, supplies, and equipment in accordance with state requirements for educational programs, for full implementation of the IEP.

**Issue:** In the IEPs reviewed, one or more required elements was not accurately reflected or the IEP document was not complete, which is prohibiting the program from fully implementing the IEP. The errors and omissions included the following:

- Staff of Bradley School was not accurately or appropriately identified according to his/her role for attending the planning and placement (PPT) meeting on page 1 of the IEP.
- The IEPs, specifically the Special Considerations described on page 10 of the IEP, did not clearly articulate the supports/services required to address the level or significance of the needs of the students enrolled.
- Clarity related to the delivery of specific related services such as counseling or speech/language was not provided on page 11. For example, counseling was identified as required for 1 hour per week and was noted as being provided in a 1:1/small group setting or in some cases "flexible depending on student need." Implementation of such services as articulated leaves service delivery undefined and open to interpretation.
- In two of the five IEPs reviewed, hours of time with non-disabled peers were indicated on page 11.

- Where a BIP was indicated in an IEP on page 10 and a document was attached to the IEP, the document lacked an appropriate title identifying it as a behavior intervention plan, which was informed by a functional behavior assessment.

**Corrective Action Required:** Develop and document a process to review IEPs developed by the PPT to ensure that IEPs accurately reflect the consensus of the PPT, are complete and accurate, reflect the current level/intensity of the student's needs, and are able to be implemented by the program as written. Additionally, where there exists a discrepancy, provide documentation that the program has appropriately notified the local education agency of the necessary changes or additions. On or before June 15, 2018, submit to the BSE a copy of the process/procedure developed to review IEPs, provide copies of the next three IEPs developed by the district's PPT where the review process has been implemented, and appropriate district notification (if needed) has been provided.

**Standard F: Program Requirements** - Any staff member of a private facility or other person acting on behalf of the facility and operating a vehicle for the purpose of transporting students, shall be properly licensed to operate that class of vehicle and shall be trained to care for the students in his/her charge.

**Issue:** The program has identified four individuals as having the role of transporting students on behalf of the program in a vehicle that meets compliance with mandates disseminated by the Connecticut Department of Motor Vehicles (DMV). Currently, only one of the four staff identified holds a DMV license and that license does not appear to have the appropriate endorsement to transport students to/from school activities. Additionally, the program does not have documentation that those holding a valid Rhode Island motor vehicle license can legally operate an "activity vehicle" registered for use within Connecticut. Lifespan Inc., operator of the Bradley School program, is currently investigating the processes necessary for the program to meet compliance requirements determined by the DMV.

**Corrective Action Required:** Cease transporting students via an activity vehicle who are enrolled in a Connecticut program, to/from activities during the school day, unless and until the program can verify that the requirements of the DMV are met; specifically the requirements related to the ability for staff licensed in either Connecticut or Rhode Island, to transport students enrolled in a Connecticut program. Submit that verification to the BSE upon receipt.

### 3. **Recommendations:**

The following recommendations are offered for review by Bradley School administration:

- Redesign the cabinet available to store medication by installing a double lock on, or within, the existing medication cabinet that is located in the nursing office and is typically behind a locked door when the nurse is not present.
- Consider providing the appropriate training to administer medication to a member(s) of the certified staff who qualifies for such training, to provide a backup if the nurse is unavailable.
- Consider implementing social skills groups facilitated by the clinical/behavioral staff to provide a proactive mechanism to "teach" social skills.

- The 2017-18 academic year marks the initial implementation of the statewide educator evaluation program within the Bradley School. Implementation of the educator evaluation program warrants the development of a professional development and evaluation committee (PDEC), whose duties include, but are not limited to, review and evaluation of the teacher evaluation plan; and the development, evaluation, and annual updating of a comprehensive local PD plan for certified employees of the program. The plan should be directly related to the educational goals prepared by the program, be developed with full consideration of the priorities and needs related to student outcomes, and provide for the ongoing and systematic assessment and improvement of both teacher evaluation and PD of the professional staff members.

Within 15 working days from the date of this preliminary evaluation report, please indicate in writing to the BSE whether Bradley School agrees with the report and whether your program accepts the delineated corrective action plan, if applicable. Upon receipt of Bradley School's acceptance of the report in its entirety, a recommendation for continuous approval through June 30, 2022, will be submitted to the Commissioner of Education.

Upon such approval, the following will be applicable to Bradley School New London Regional:

**Ages Approved to Serve:** 3 through 22 years

**Approved Capacity:** 72 students

**Expiration Date:** June 30, 2022

cc: Laura Cherrick, Director of Education  
Trish Martins, Director of Education