



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Marjorie Castro, Ed.D.
Chief Administrator
Eagle Hill School

FROM: Colleen M. Hayles, Education Consultant/Coordinator
Bureau of Special Education
Approved Private Special Education Programs

DATE: April 5, 2018

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

On February 15, 2018, an evaluation team visited the Eagle Hill School (Eagle Hill) special education program in order to conduct an on-site review for continuous approval from the Connecticut State Department of Education (CSDE). The team consisted of:

- Colleen Hayles, Education Consultant/Coordinator, Bureau of Special Education (BSE);
- Kevin Ryan, Director of Education, Spire School; and
- Carole Swift, Director of Pupil Personnel Services, Milford Public Schools.

During a previous on-site visit on February 8, 2018, Ms. Hayles reviewed the education files of students as well as personnel files. In addition, Ms. Hayles has reviewed the application and its accompanying documents submitted to the BSE by Eagle Hill administration.

At the exit conference on February 15, 2018, Ms. Hayles and the evaluation 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**

- The climate and culture of the program is collaborative, highly individualized, and focused on skill development, therefore providing students with the tools to promote success as lifelong learners. Collaboration among staff is promoted through daily morning meetings that provide an opportunity for staff to communicate and maintain a working partnership in an effective manner, to meet the needs of students.
- Staff maintain small caseloads allowing for the development of focused differentiated instruction that is tailored for skill growth and fostered through collaboration among each team of teachers. “Staffings” are held each morning and provide the opportunity to review each student’s progress.
- Professional development (PD) is available to staff weekly through a comprehensive and cohesive program that taps into their expertise as well as external experts in various areas.
- The program employs an “advisor system” where each student is assigned an identified administrator who provides supports and guidance to individual students. Advisors also act as the point person in relation to parent/local education agency (LEA) contacts.
- The program employs a “call back period” where staff or students can request a tutorial to reinforce concepts as needed, provide an opportunity for students to catch up with missed work, and/or promote accountability of student learning.
- As students exit Eagle Hill, the program maintains contact and oversight of their progress. This contact/oversight continues in an effort to measure student success, his/her ability to adapt to a different learning environment, and ability to apply the “how-to-learn” skills in a less restrictive instructional setting.
- Four to five times a year, teams meet to address the “what,” “why,” and “how” of their instructional practice.
- Students are afforded 80 minutes of daily reading instruction in addition to a daily literature class. Younger students benefit from an oral language course developed by the speech and language therapist to address specific language issues demonstrated while older students participate in a study skills class.
- The program implements multiple methodologies and strategies across the curriculum in providing the specialized instruction outlined in the individualized education programs (IEPs) of students enrolled. Identified staff are trained in various programs to address language-based learning differences.
- The program provides a highly structured learning environment. Both academic and behavioral expectations are clearly defined and effectively communicated to students. Preventive discipline and positive behavior supports are implemented at all levels.

- The campus houses excellent facilities appropriate for addressing the academic, social, emotional, and physical development needs of the students.
- The program continues to implement a daily “learning lunch” where staff dines with students in a structured atmosphere that promotes positive relationships among peers and adults, engages students in social learning, and solidifies the culture of the Eagle Hill community.
- An array of technology is available to students and integrated into their classroom instruction.
- Staff views the teacher orientation and mentoring processes in place for new Eagle Hill teachers as comprehensive, extremely beneficial, and a means of promoting accountability and fidelity in addressing each student’s IEP.

2. Standard Deficiencies:

The following standard deficiencies must be rectified:

Standard I: Qualifications and Requirements for Instructional, Administrative, and Support Personnel - All special education program administrators, instructional, and related services personnel providing special education and related services who were hired after September 1, 1980, shall hold proper state certification and shall be on file with the CSDE.

Issue: The certification status for a total of nine educators or related service providers remains either under review or cannot be determined at this time—appropriate steps have not been taken by the individual candidates to pursue acquisition of certification in the state of Connecticut. The program has been provided with the names of the staff who are not currently certified in Connecticut.

Corrective Action Required: On or before June 30, 2018, submit current certification for ALL identified personnel. Failure to meet this standard on or before June 30, 2018, may result in a change in approval status from “approved” to “conditional approval.” A conditional approval is limited to one year and requires that the program take actions specified in the *Policies, Procedures, and Standards for the Approval of Private Special Education Programs*.

Standard F: Program Requirements - A private facility shall have a written description of the IEP for each student and should include as appropriate, a behavior intervention plan; the student success plan; the language and communication plan; and as appropriate, 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 and sufficient instructional materials, supplies and equipment, in accordance with state requirements for educational programs to fully implement the IEP.

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

- Staff of Eagle Hill was not accurately or appropriately identified according to their roles as attending the planning and placement team (PPT) meeting on page 1 of the IEP.
- Clarity related to the delivery of specific related services such as “speech/language” was not provided on page 11. For example, “speech/language” was identified as required for one hour per week and was noted as being provided in a 1:1/small group setting or in one case, “flexible depending on student need.” Implementation of such services as articulated leaves service delivery undefined and open to interpretation.
- In one of the five IEPs reviewed, hours of time with non-disabled peers were indicated on page 11.
- In four of five IEPs reviewed, it was not clearly documented that a PPT was held prior to placement at which a representative from Eagle Hill participated.
- In one of five IEPs reviewed, it was indicated that the program was unable to provide the occupational therapy services as required in the IEP. The program can only accept those students for whom the IEP can be fully implemented—whether it be through services available by Eagle Hill full- or part-time employees, its contracted staff, or provided through an agreement with another entity (i.e., an LEA or other agency).

Corrective Action Required: Develop and document a process to review IEPs developed by the LEA to ensure that the 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 LEA 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 and 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.

Corrective Action Required: In the case where the program cannot provide a related service outlined in the IEP through its current full- or part-time staff, but can contract or enter into an agreement with another agency or entity to provide that service, the program must appropriately document such an arrangement and maintain that documentation in the student file and provide evidence of such a contract as part of the approval application. On or before May 15, 2018, submit a copy of any agreement(s) made by Eagle Hill for the provision of IEP required services by another agency or entity.

Issue: The program has an established admissions office and staff. However, it is not evident when a student is referred by an LEA for placement at Eagle Hill that appropriate practices are in place. Specifically, those practices in place as it relates to educational staff review of the current IEP and an understanding that prior to placement at Eagle Hill, the district must convene a PPT and a representative from Eagle Hill must be present at that placement PPT.

Corrective Actions Required: On or before May 15, 2018, provide documentation that the procedures for admission of LEA placed students have been reviewed with Eagle Hill admission office staff. For students referred by the LEA, submit to the BSE copies of the next three IEPs reflecting that the placement PPT was convened by the responsible LEA and a representative from Eagle Hill was present.

Standard E: Individual Student Records - A student's individual record shall contain, as a minimum, the following:

- A copy of the IEP;
- Consent forms allowing for authorization of all prescribed medical care and emergency medical treatment, etc.;
- Cumulative health records;
- Evaluation records; and
- At least two reports per year of student progress toward achieving the objectives in the IEP.

Issue: In one of five files reviewed, a current IEP was not found and the contents of the previous IEP (2016-17) was unreadable. Additionally, the student files maintained by the program were not adequately organized or maintained in a manner that a student's educational history, referral, current programing, or progress monitoring data was easily accessed.

Corrective Action Required: On or before May 15, 2018, submit to the BSE an index or organizational format that will be consistently used for student files. In addition, the format must allow easy access and reference for administrators, teachers, related service personnel, LEAs, parents, and others who may need access in order to gain insight of the students served and to ensure implementation of a student's individual program with fidelity.

3. Recommendations:

It is recommended that your program consider taking the following action:

- Provide opportunities for PD activities that focus on developing goals and objectives for those students whose skill level falls behind the expected grade level, ensuring that curriculum and instruction aligns with Connecticut Core Standards. Teachers will benefit from training in writing standards-based IEPs.
- Examine the current process and calendar for the provision of required reports of progress toward the goals/objectives identified in the IEP. Ensure that the dates noted for progress reporting on the student's IEP are accurately recorded and used to trigger the provision of the reports of progress to both the parent and the LEA.
- Provide in each staff file the annual summary or transcript that indicates his/her PD activities.
- Provide the appropriate training to additional school personnel "qualified" to administer medication in school.
- Review with members of the instructional and related service staff the revision to their job descriptions. Ensure that the revised job description reflects Eagle Hill staff's role in implementing the IEPs for students placed by an LEA, assuring that classroom teachers participate in the development of a student's program (provide draft goals and objectives), are present at each PPT, and do not take any additional action related to evaluation or provision of services without the PPT's recommendation.

- Review the roles of “advisors” and instructional staff (specifically, contact with parents and LEAs) and ensure that teachers and related service personnel are not removed from an appropriate level of communication and contact with parents, and as appropriate, LEA representatives.
- Provide opportunities for teachers and related service personnel to visit and observe public school classrooms, as well as other nonpublic school settings, where students may transition to upon PPT recommendation. A clear understanding of the expectations, (academic and social/emotional) instructional models, and level of expected self-advocacy will assist in preparing students for this transition.
- Consider the addition of a position dedicated to providing technical assistance to teachers in order to enhance the use of available technology.

Within 15 working days from the date of this preliminary evaluation report, please indicate in writing to the BSE whether Eagle Hill agrees with the report and accepts the delineated corrective action plan, if applicable. Upon receipt of Eagle Hill’s acceptance of the report in its entirety, a recommendation for continuous approval through June 30, 2021, will be submitted to the Commissioner of Education.

Upon such approval, the following will be applicable to the special education program:

Approved Ages to Serve: 5 through 15 years

Approved Student Capacity: 260 students

cc: Wendy Salisbury, Director of Education