



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Deana Gagliardi
Chief Administrator
High Road School of New London Middle/High School

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

DATE: March 14, 2019

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

On December 4, 2018, an evaluation team visited High Road School of New London Middle/High School (HRS New London Middle/High) in order to conduct an on-site review for continuous approval as a Connecticut State Department of Education approved private special education program (APSEP). The team consisted of:

- Colleen Hayles, Education Consultant/Coordinator, Bureau of Special Education (BSE);
- Jeff Drew, Director of Education, Whitney Hall School; and
- Pamela Evens, Director of Special Education, Hartford Public Schools.

During a previous on-site visit on November 30, 2018, Colleen Hayles reviewed the education files of students as well as personnel files. In addition, Ms. Hayles has reviewed the application materials submitted to the BSE by HRS New London Middle/High administration.

At the exit conference on December 4, 2018, 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.

Commendations:

- The program employs a rotation system in delivering instruction allowing for differentiated and individualized skill development as well as adaptive computerized learning to reinforce newly acquired academic skills.

- A review of individualized education programs (IEPs) found evidence of a process and procedure in place to review IEPs upon referral, prior to a pre-placement planning and placement team (PPT) meeting, and upon receipt of the IEPs developed after enrollment.
- A Quality Risk and Safety Committee is in place to identify student needs that may exceed the provisions of the program model. Data is collected and closely examined to recommend “next steps” and to increase positive behavioral outcomes for students.
- The program has made significant inroads with community resources to provide support to the program, as well as individual students, in addressing personal challenges that impact a student’s ability to access his/her education.
- The program focuses on data to drive instruction as well as initiatives to improve attendance and increase academic rigor. The focus has led to an overall attendance rate of 80–90 percent.
- Staff works hard to develop strong relationships with students, therefore, increasing trust and a culture of shared respect.
- The program employs a full-time transition coordinator who addresses opportunities for students to explore and expand upon interests and planning for post-school success.
- The administration and staff embrace every opportunity to provide students and families with a positive school experience, which many have not experienced in the past.
- The teacher student ratio is 1:11. Each teacher is supported by a classroom paraprofessional. The provision of a paraprofessional to support each instructional space promotes a personalized culture of academic learning and a safe environment for students to build self-confidence and competence. One-to-one paraprofessional support is provided when indicated within the IEP.
- The schoolwide level system is focused on equipping students with learning strategies to manage their impulses, accept an appropriate level of responsibility for their actions, and self-monitor their behavior. The consistent language, tone, and volume used by staff in delivering verbal prompts and expectations to students, promotes a predictable environment. The structure of the level system allows all staff to be unified when addressing student behavior.
- Students and staff benefit from the support of a full-time social worker. In addition to individual and small group services specified in each student’s IEP, students and teachers can request additional consultation time with the social worker, as needed, throughout the day. The social worker also provides support and resources to parents.
- The program develops a portfolio for each student that outlines student instruction, performance diagnostics, and progress reports. Differentiated online instruction according to student ability is developed. Individualized performance and progress reports are available throughout the year and provide data for progress monitoring.
- The social work backgrounds of the director of education and chief administrator provide a clinical perspective and added layer of support to both students and staff.

Standard Deficiencies:

The following standard deficiencies must be rectified:

Standard D: Administration - A private facility shall have a written policy to assure that it complies with the provision of the Individuals with Disabilities Education Improvement Act, Public Law 108-446; Section 504 of the Rehabilitation Act of 1973; The Family Educational Rights and Privacy Act 20 United States Code Section 1232g; 34 Code of Federal Regulations Part 99, Sections 10-76a to 10-76q, inclusive, of the Connecticut General Statutes (CGS) and the regulations adopted thereunder; Public Act (PA) 96-246 (reporting of child abuse); PA 11-232 - An Act Concerning the Strengthening of School Bullying Laws; PA 12-99 - An Act Concerning the Reporting of Children Placed in Seclusion; and all other relevant federal and state laws and regulations and local requirements.

Issue: There is no evidence that the program utilizes the State of Connecticut Educational Employer Verification form in accordance with PA 16-67. As required by the CGS Section 10-222c, as amended by PA 16-67, each APSEP is required to obtain the information listed on the Connecticut employer verification form from all current or former employer(s) of the applicant if such employer was a local regional board of education, a governing council of a state or local charter school, an interdistrict magnet school operator, or if the employment caused the applicant to have contact with children. Applicants are required under the law to provide a prospective employer with the name, address, and telephone number of all current or former employers that meet the above criteria. Information may be collected either through a written communication or telephonically.

Corrective Action: Provide an attestation indicating that the State of Connecticut Educational Employer Verification form will be obtained for each new employee and that upon obtaining completed forms, the program's chief administrator or director of education will make appropriate contact with previous or current employers.

Standard F: Program Requirements - The local school district is responsible for the development and appropriateness of a student's IEP and any changes made in that IEP. Each private facility shall request from the placing local education agency (LEA), an IEP, prior to the enrollment of the student in the private facility. The IEP shall serve as the basis for instruction for each student. The IEP presented by the LEA also serves as the basis for admission and should identify the student's current performance levels, the appropriate specialized instruction, and required related services. Each private facility should participate in the PPT meeting that discusses and determines placement in the facility prior to enrollment.

Issue: In the IEP, there is no documentation of an agreement with the LEA for the provision of related services that are not available through employees of HRS New London Middle/High (i.e., speech language and occupational therapy services). Such an agreement is required for the program to meet its obligation to fully implement the IEP.

Corrective Action: On or before June 15, 2019, provide the BSE with a representative copy of an agreement with an LEA for the provision of any related service as needed.

Issue: In the IEPs reviewed, one or more required elements was not accurately reflected or the IEP document was not complete, therefore prohibiting full implementation of the IEP. Errors and omissions included the following:

- In four of five IEPs reviewed, the service implementers of specialized instruction were not accurately identified.
- On the IEP, the counseling services indicated were not clearly articulated to specify if the delivery of the related service is provided on a 1:1, small group basis or other means.

- Staff and their roles were not appropriately identified in the documentation of those attending the PPT and contributing to the IEP.
- Special considerations must be addressed by the PPT when a student’s behavior interferes with the ability of the student to access or benefit from their education. Documentation of the means by which behavior supports are provided are not complete or accurately identified (i.e., accessibility to social worker as needed, schoolwide behavior system, and behavior intervention plan, if applicable).

Corrective Action: While the program has initiated a process and procedure for the review of an IEP received from the LEA and has identified in writing the need to make corrections, there remains a need for further scrutiny of the IEP document. Submit to the BSE copies of the next three IEPs developed by the LEA’s PPT for students enrolled. Demonstrate careful review for accuracy and completeness, and if needed, illustrate the implementation of written notification to the district requesting necessary changes.

Recommendations:

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

- Review the need for additional social work services to elevate the need to utilize the social work services from the High Road School of New London Primary School to address the needs of students.
- Review the policy related to utilization of the Record of Access form in each student file with staff.
- Consider a mechanism or process for determining necessary content area curriculum materials.
- Consider involving a recruiter to enhance the applicant pool when hiring new staff.
- Encourage staff to increase affirmative verbalizations and “positive talk” with students to capitalize appropriate social interactions and provide positive models.
- Explore opportunities to increase utilization of the gym and provide more options for “open space.”
- Continue to explore and expand on the development of evidence-based program measures that illustrate the overall efficacy of the program.

Within 15 working days from the date of this preliminary evaluation report, please indicate in writing to the BSE whether your program agrees with the report and accepts the delineated corrective action plan. A recommendation for continuous approval through June 30, 2024, will be submitted to the Commissioner of Education upon receipt of HRS New London Middle/High’s acceptance of the report in its entirety.

Upon such approval, the following will be applicable to HRS New London Middle/High:

- Approved Ages:** 12–21 years old
- Approved Grades:** 7–12
- Approved Capacity:** 30 students
- Approval Expiration Date:** June 30, 2024