



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



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

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

DATE: March 12, 2019

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

On November 27, 2018, an evaluation team visited High Road School of New London Primary School (HRS New London Primary) 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);
- Mike Nicholson, Director of Education, The Foundation School; and
- Dori Papa, Education Service Specialist, BSE.

During a previous on-site visit on November 20, 2018, Colleen Hayles and Dori Papa 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 Primary administration.

At the exit conference on November 27, 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 provides structured, differentiated, and individualized programs of instruction that include a blend of 1:1 and small group instructional experiences that address the academic and behavioral needs of students and fosters interactive learning.

- The program employs a rotation system in delivering instruction that allows differentiated and individualized skill development as well as adaptive computerized learning to reinforce newly acquired academic skills.
- Staff is characterized as dedicated, encouraging, and positive in their interactions with students. Staff share an appreciation of the need for collaboration and teamwork.
- 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 individualized education program (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.
- Daily "close-out meetings" are held to discuss student progress, review events of the day, and provide staff support.
- The program has experienced success in transitioning students to a less restrictive instructional setting.
- The location of the program within a public school building lends itself to opportunities for students to benefit from time with non-disabled peers.
- The program engages parents in monthly parent/family activities designed to enhance the school/family partnership. Additionally, a daily communication log is maintained that outlines a student's level status, homework, and other notes. Parents receive weekly phone contact as well.
- The program implements the "i-Ready" curriculum and develops a portfolio for each student. The i-Ready program delivers student instruction, performance diagnostics, and progress reports based on K-12 Common Core State Standards in mathematics and reading. Differentiated online instruction, according to student ability, is developed. Individualized performance and progress reports are available throughout the year, tracking accomplishments, and providing data for progress monitoring.
- The program employs a four-step plan in addressing the needs of each student. This process begins with an assessment, a targeted skill area, an evaluation and identification of the tier of intervention necessary, and development of an individualized plan of instruction and intervention.

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 the instruction of each student. The IEP presented by the LEA 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 planning and placement team (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 Primary (i.e., speech language and occupational therapy services). Such an agreement is required to ensure for the program meets its obligation to fully implement the IEP.

Corrective Action: On or before June 10, 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 three of the five IEPs reviewed, the service implementer(s) was inaccurately identified.
- On the IEP, the counseling services indicated must be separated/broken out to specify if the delivery of the related service is provided on a 1:1 small group basis or other means.

- On page one of the IEP, staff was not appropriately identified.
- On page 10 of the IEP, behavior supports must be explicitly stated to reflect the student's level of need (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:

- Increase the availability of technology including SMART Boards (an interactive white board) and projectors for classrooms, to enable teachers to differentiate instruction and further support instruction through the visual modality.
- Continue expanding upon book inventory in the student reading area.
- Make opportunities available for students to access hands-on sensory materials and activities.
- Consider the use of a separate area/room for time out versus seclusion. It appears that currently the time out space and spaces available for emergency seclusion are one in the same and may result in an escalation of behavior while in "time out" by virtue of association with the area used for seclusion.
- Continue to explore and expand on the development of evidence-based program measures that illustrate the overall efficacy of the program.
- Consider the enhancement of the "sensory space," supplementing equipment and material that will provide students with expanded opportunities to access "sensory breaks."

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 Primary's acceptance of this report in its entirety.

Upon such approval, the following will be applicable to HRS New London Primary:

Approved Ages:	5–12 years old
Approved Grades:	K–6
Approved Capacity:	56 students
Approval Expiration Date:	June 30, 2024