



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Kathryn Cyr, Chief Administrator
IPPI Learning Academy: Stratford

FROM: Dori Papa, Ed.D., Education Consultant
Bureau of Special Education *DP*

DATE: May 21, 2019

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

On February 22, 2019, an evaluation team visited the IPPI Learning Academy: Stratford (IPPI) special education program to conduct an on-site review for reapproval. The team consisted of:

- Colleen Hayles, Education Consultant/Coordinator, Bureau of Special Education (BSE);
- Dori Papa, Education Consultant, BSE; and
- Michele Lestrud, Director of Education, Gengras Center.

During a previous on-site visit on January 24, 2019, Colleen Hayles and Dori Papa reviewed the education files of students as well as personnel files. In addition, Ms. Papa has reviewed the application materials submitted to the BSE by IPPI administration.

At the exit conference on February 22, 2019, 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 team observed a mutually respectful atmosphere between all individuals involved within the school, including administrators, teachers, staff members, students, and visitors.
- The team reported evidence of well-planned instruction, which appeared to be appropriate to the current level of performance for each student. Teachers had an identified goal and objectives that were clearly stated and posted during the course of the lesson.

- Classroom observations confirmed the implementation of appropriately differentiated instruction and access to necessary accommodation(s) aligned with student individualized education programs (IEPs).
- The school has invested in technology that supports teachers in their instruction and students in their learning.
- Students observed were engaged in their instruction and demonstrated a willingness to take risks.
- Staff is characterized as dedicated, encouraging, and positive in their interactions with students.
- Staff share an appreciation of the need for collaboration and teamwork.
- An outstanding level of collaboration, communication, and consistency relative to the development and implementation of appropriate social, emotional, behavioral, and academic programming for each student enrolled, was noted by all staff interviewed.
- An overall 1:1 ratio of students to staff affords opportunities for “in the moment” coaching to support students’ social, emotional, and behavioral health.
- The consistent language, tone, and volume used by staff in delivering verbal prompts and expectations to students, promote a predictable environment.
- The program is invested in strengthening the home-school partnership and encourages consistency between home and school.
- The Naugatuck program site provides an inviting and bright learning environment, including a new gymnasium that will be available for use in the near future.
- IPPI continues to develop, provide, and explore vocational and transition opportunities within the program and in the community that focus on the development of independent living skills.

Standard Deficiencies:

The following standard deficiencies must be rectified:

Standard B: 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: As required by the CGS Section 10-222c, as amended by PA 16-67, each approved private special education program is required to obtain the information listed on the Connecticut State Department of Education (CSDE) Educational Employer Verification form from all current or former employer(s) of the applicants hired on or before July 1, 2016, 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.

In two of five personnel files reviewed of employees that were hired after July 1, 2016, there was no evidence that a CSDE Educational Employer Verification form was completed.

Corrective Action: Provide an attestation to the BSE that the CSDE 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.

Issue: Space used for seclusion or exclusionary time out did not provide appropriate access for students to exit the space. The inside door handles were not within accessible reach of all students.

Corrective Action: On or before June 30, 2019, submit to the BSE photo documentation that appropriate egress has been provided for students while in the seclusion space.

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 an IEP from the placing local education agency (LEA) prior to the enrollment of the student. The IEP shall serve as the basis for instruction for each student. The IEP presented by the LEA serves as the basis for admission and should identify the current performance levels of the student, 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 placement.

Issue(s):

- In three of five IEPs reviewed, related services indicated on the IEP were not separated/broken out to specify if the delivery of service is provided on a 1:1, small group basis, or other means.
- In one of five IEPs reviewed, there was not an accurate description of a diagnostic placement. The IEP developed does not reflect a trial placement for diagnostic purposes. It appears that this placement was initiated to determine the appropriateness of the placement rather than for the purpose of determining eligibility or to develop or revise the IEP.
- In one of five IEPs reviewed, IPPI was identified as the district (LEA).
- In one of five IEPs reviewed, page 2 of the IEP (Summary) indicates the student is eligible for extended school year (ESY) services for 2018 but on page 11 of the IEP, "No" is checked for ESY.

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, demonstrating careful review for accuracy and completeness and if needed, illustrating the implementation of written notification to the district to request necessary changes.

Standard J: Health and Safety - A private facility shall conduct monthly emergency drills that shall include one crisis response drill other than a fire drill once every three months.

Issue: In reviewing emergency drill records, fire drills were documented to occur monthly. However, there was no evidence that every third drill was another type of crisis drill.

Corrective Action: On or before June 30, 2019, submit to the BSE an attestation that the program will maintain emergency drill documentation evidencing that every third drill will be a crisis drill.

Recommendations:

The following recommendations are offered to IPPI:

- Review restraint and seclusion data to ensure you are not over reporting.
- Include in each staff member's personnel file, the full listing of professional development activities provided by the program and/or engaged in by the staff member.
- Consider making more space available to be utilized for therapy sessions in the Stratford school site.
- Continue to develop opportunities for IPPI students to interact with nondisabled peers in the public school in extracurricular activities creating unified teams.
- Continue to move forth with strengthening the coaching model for teachers through the development of IEP rubrics to ensure teachers understand the individualized needs of their students.

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. Please be advised that a recommendation for continuous approval through June 30, 2024, will be submitted to the Commissioner of Education once written acceptance of the report in its entirety is received.

Upon such approval, the following will be applicable to IPPI:

Approved Ages:	5–21 years old
Approved Grades:	K–12
Approved Capacity:	90 students
Approval Expiration Date:	June 30, 2024

cc: Dori Papa, Education Consultant
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Lisa Riggi, Director of Education
Paul LoVoi, Associate Director
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