



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Ms. Donna Swanson, Chief Administrator
FOCUS Center for Autism - The Fresh Start School

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

DATE: December 11, 2017

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

On November 28, 2017, an evaluation team visited The Fresh Start School (Fresh Start) in order to conduct an on-site review for continuous approval as a Connecticut State Department of Education (CSDE), Approved Private Special Education Program (APSEP). The team consisted of:

- Colleen Hayles, Education Consultant/Coordinator of APSEPs, Bureau of Special Education (BSE);
- Scott Rossignol, Supervisor of Special Education, Farmington Public Schools; and
- Paul LoVoi, Associate Director of Education, The Gengras Center.

During an on-site visit on November 8, 2017, Ms. Colleen Hayles reviewed the education files of five students enrolled by local education agencies (LEAs), as well as personnel files. In addition, Ms. Hayles has reviewed the application binder of materials submitted to the BSE by Fresh Start administration.

At the exit conference on November 28, 2017, 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:

- Fresh Start staff works collaboratively to provide personalized student-centered programming, which emphasizes relationships and capitalizes on students' strengths and individuality.

- The program provides highly individualized instruction and support within a structured milieu using evidence-based naturalistic interventions to address communication and social learning. Classroom observations confirmed the implementation of appropriately differentiated instruction and access to necessary accommodations.
- Staff articulated a depth of knowledge related to the unique educational needs of the students enrolled as well as the clinical supports needed to promote growth and success. Staff is well connected and knowledgeable about the preferences and needs of each student served.
- The program implements a wide variety of tools and both low- and high-tech strategies to move students toward greater independence and improved social and educational competence.
- The program effectively implements de-escalation practices based on Therapeutic Crisis Intervention tenets, positive behavioral supports, and the integration of “mindfulness” strategies throughout the daily routine. The individualized and supportive nature of the environment creates an overall climate of acceptance and respect, and appears to have a positive impact based on the frequency of student behaviors, which require emergency responses such as restraint or seclusion.
- A quiet area where students may elect to take a break or be guided by staff to deescalate, continues to provide students with an appropriate environment to air concerns, debrief a problem situation, regain control, and set appropriate goals.
- The program maintains the consultation services of a reading/language arts consultant to enhance the program’s ability to address the diverse needs of the students served and support teachers in the provision of effective reading instruction.
- A review of current student files revealed well-developed and documented functional behavioral assessments (FBAs) and behavior intervention plans (BIPs) for each student enrolled in the program. Data is collected and reviewed for the purpose of informing the BIPs, which are reviewed on a regular basis.
- 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, which were clearly stated and posted during the course of the lesson.
- Students are afforded some opportunities for community engagement through relationships with local businesses and other community agencies and resources.
- Fresh Start also provides opportunities for extended day programs and extended school year services, which are uniquely flexible in addressing the individual need of students.
- A parent support group is available every other week.

2. **Standard Deficiencies:**

The following standard deficiencies must be rectified:

Standard F: Program Requirements – The local school district is responsible for the development and appropriateness of a student’s individualized education program (IEP) and any changes made in that IEP. Each private facility shall request from the placing LEA, an IEP prior to enrollment of the student in the private facility. The IEP shall serve as the basis for instruction for each student.

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 (LCP); and transition goals and objectives that move the student toward college or career readiness including opportunities to work and interact in the community, and a written curriculum, sufficient instructional materials, supplies, and equipment in accordance with state requirements for educational programs, for full implementation of the IEP.

Issue: A review of IEPs indicated inaccuracies or incomplete aspects that can impact the ability for Fresh Start to implement the IEP with fidelity in full, or are not in alignment with the program provided for individual students. In three of three IEPs reviewed, required elements of the IEP were not accurately reflected or the IEP document was not complete. Errors and omissions included the following:

- The related services identified on page 11 were not reflected appropriately, as services were not clearly identified as being provided individually, within a small group, or within the context of both settings.
- In two of three IEPs reviewed, the “providers” of Special Education Services (i.e., Responsible Staff and/or Service Implementers listed on page 11) were not accurately or completely identified (i.e., a regular education teacher was listed; instructional aides/paras were not listed).
- In one of three IEPs reviewed, page 10 of the IEP was not completed with accuracy, as the required special considerations for students who are deaf or hard of hearing, were not documented on an attached LCP and included as part of the IEP.
- In three of three IEPs reviewed, the use of restraint and/or seclusion was identified as an accommodation on page 8 of the IEP.

Issue: Each student enrolled at Fresh Start benefits from an FBA, which has been conducted to inform an individualized BIP. While these plans were available in the files, the IEPs (page 10) do not reflect the need for a BIP, or other elements such as the teacher student ratio, goals and objectives, positive behavior supports, and schoolwide strategies required to address the behavior issues that impact each student’s ability to benefit from his/her instruction.

Corrective Actions Required: Develop a process to review each IEP developed by the district for implementation by the program following a planning and placement team (PPT) meeting. If changes or additions are required in an IEP developed by the district to accurately reflect PPT decisions, the program must document the need for the changes, forward a written request to the LEA, and maintain a copy of the communication with the IEP in the student file. On or before February 30, 2018, submit to the BSE a summary of the process developed to review each IEP for completeness and accuracy. Submit to the BSE copies of the next three IEPs developed by the PPT demonstrating an accurate description of the program for each student. If upon implementation of the review process revisions by the district are required, include a copy of the communication developed by the program that outlines the area requiring revision.

Standard I: Qualifications and Requirements for Instructional, Administrative and Support Personnel – All special education program administrators, instructional personnel, 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 State Board of Education.

Issue: A social worker is hired by FOCUS Center for Autism, but assigned full time to Fresh Start through an agreement between the agency and the APSEP. If the social worker holds no other role outside of Fresh Start, the social worker should be appropriately included as a member of Fresh Start staff and should hold the appropriate CSDE certification as a school social worker.

Corrective Action Required: Review the role of the social worker, who currently holds only a valid social work license. Based on that review, reevaluate the need for that position to be included on the staff roster for Fresh Start and require that the social worker filling that position hold the appropriate certification. Provide to the BSE a summary of that review and evidence that appropriate steps are being taken to meet the certification requirements.

Issue: A private facility shall have a written plan(s) for ongoing professional development (PD) including a PD policy. Such policy shall include the requirement of 18 hours at-no-cost PD opportunities aligned to the individual educator evaluation to support areas of identified need and the proper documentation of PD activities. The private facility shall maintain a permanent individual personnel file for each employee that includes documentation of all PD activities in which employees participate. While Fresh Start does maintain documentation of some PD activities, primarily those required for all employees of the larger agency, documentation of all activities (reflecting 18 hours) are not maintained in each staff file.

Corrective Action Required: Develop a procedure for staff to provide documentation of a minimum of 18 hours to the Fresh Start Human Resources Department for inclusion in each staff file. On or before March 1, 2018, submit to the BSE a copy of the policy and procedure as shared with staff to ensure that each staff file reflects the required 18 hours of PD made available by Fresh Start.

3. **Recommendations:**

The following recommendations are offered for review by Fresh Start administration:

- Continue to seek an alternative site for the program to address the concern over instructional space and ensure access to, and effective use of, technology and other instructional tools, which continue to be somewhat limited by the instructional spaces/classrooms within the current facility.
- Provide PD addressing the development of IEPs that are aligned with the standards and provide clear tools for measuring growth.
- Remain current in the required activities of the educator evaluation system. Fresh Start will be required to submit the results of each certified educator's overall rating in spring 2018 and each year thereafter.
- Continue to promote and enhance the use of the data to drive instruction and therapeutic supports to students. Utilize progress monitoring data (academic and behavioral) to determine the need to request a revision of IEPs for LEA placed students.
- Review the current job descriptions to ensure that the "duties" outlined are within the scope of the identified role/position and do not indicate duties that fall outside the individual's area of certification.
- Finalize and disseminate a Parent Handbook to provide parents with the policies/procedures of the program and pertinent information related to student enrollment at Fresh Start.
- Review and revise Fresh Start Admissions/Enrollment Packet to reflect accurate information, and policies and procedures related to both LEA placed students and students placed unilaterally by parents. Specific attention to the revision of sections referencing "grievance procedures" is recommended, and if included, must outline the complaint resolution process as detailed in state and federal laws.

- Expand opportunities for students to participate in community-based transition activities and focus on increasing student's individual level of independence. Provide students with experiences based on their individual areas of interest, fostering increased levels of independence, and varied opportunities as young adults.

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 whether your program accepts the delineated corrective action plan, if applicable. Upon BSE receipt of Fresh Start School's acceptance of this report in its entirety, a recommendation for program approval through June 30, 2021, will be submitted to the Commissioner of Education.

Upon such approval, the following will be applicable to The Fresh Start School:

Ages/Grades Approved to Serve:	10 through 19 years old/Grades 5–12
Approved Student Capacity:	20 students
Expiration Date:	June 30, 2021

cc: Carol Doiron, Director of Education