




STATE OF CONNECTICUT  
DEPARTMENT OF EDUCATION



**TO:** Daniel Murray, Psy.D.  
Chief Administrator  
Arch Bridge School

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

**DATE:** December 11, 2018

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

On October 24, 2018, an evaluation team visited Arch Bridge School (Arch Bridge) 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, Bureau of Special Education (BSE);
- Valentina Parchin, Director of Education, Ädelbrook-The Learning Center of East Hartford; and
- Susan Budris, Director of Special Services, Bethel Public Schools.

During a previous on-site visit on October 16, 2018, Ms. Colleen Hayles of the BSE reviewed the education files of five students as well as personnel files. In addition, Ms. Hayles has reviewed the application materials submitted to the BSE by Arch Bridge administration.

At the exit conference on October 24, 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:**

- Arch Bridge School provides a student-centered, therapeutic program with a high staff to student ratio, which supports each student's need for individualization and differentiation of instruction. The educational approach focuses on the development of a supportive personal relationship with each student and family within a clearly defined structure of services, expectations, and consequences.
- All teachers and related service personnel work collaboratively to provide a high degree of social, emotional, and behavioral structure and support to students throughout their day.
- Administrative, instructional, and clinical staff are using data to analyze behavior trends and inform academic instruction. Such analysis has resulted in changes to the level of student supervision/support, changes in schedules, and changes in daily routines/practices.
- Arch Bridge School provides instruction by highly qualified and certified general education subject area teachers who work in tandem with special education teachers to provide specialized instruction within a rigorous academic curriculum.
- Communication between program administration and the placing local education agency (LEA) is frequent and ongoing and provides interim reporting regarding a student's academic and emotional status.
- Transition opportunities are highly individualized and developed to meet individual student needs. Though vocational/employment opportunities are limited within the immediate community of the school, staff work closely with districts to design flexible programming to allow students transition experiences within their home communities.
- Arch Bridge School promotes positive behavioral supports and a caring and respectful climate throughout the program. Emphasis is placed on resolving school related issues and preparing students to return to their schools of origin better able to function successfully.
- The overall goal of each student's program is to re-engage him/her within his/her home district or move to a less restrictive program. The average length of stay for students is approximately 12–15 months. Additionally, if determined appropriate and recommended by the planning and placement team (PPT), an opportunity for flexible implementation of the IEP within the Arch Bridge program and district program is available.
- Parent participation is an essential part of the program and a required component. Parent support groups and training opportunities provide instruction and guidance to enhance parenting skills and offer an opportunity to share information and experiences.
- Close communication and a cohesive approach to promote student learning is evident throughout the education program and is well-coordinated with the residential program. Time is allocated within staff schedules to provide the necessary vehicle for daily communication.

- Staff reports a high degree of guidance and support from the program's director of education and indicates that identified needs of teachers and clinical staff are always recognized. Systems are in place for staffing and enhanced collaboration among staff.
- Staff describes professional development as targeted and relevant to addressing the needs of the students enrolled.
- Evidence of appropriate and ongoing implementation of the educator evaluation process is noteworthy. The program has engaged a consultant to work with staff around the development of student learning outcomes.
- Psychiatrist services are available on grounds to support the clinical needs of students.

**Standard Deficiencies:**

**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 1076q, 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 12-88 - An Act Concerning the Reporting of Children Placed in Seclusion; and all other relevant federal and state laws and regulations and local requirements.

**Issue:** A review of the Arch Bridge School personnel files indicated that the required Connecticut Educational Employer Verification form for recent hires, was not completed and has not been part of the hiring process. As required by CGS Section 10-222c, as amended by PA 16-67, each APSEP is required to obtain the information listed on the Educational Employer Verification form from ALL current or former employer(s) of the applicant if such employer was a local or 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 Required:** On or before June 30, 2018, submit to the BSE copies of a completed Connecticut Educational Employer Verification form for each new hire, and/or submit an attestation that utilization of this form has become a component of the hiring process and that a copy of the completed form is part of the staff file.

**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 LEA prior to 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 serves as the basis for admission and should identify the current performance levels of the student, the appropriate specialized instruction, and required related services. Prior to placement, each private facility should participate in the PPT that discusses and determines placement in the facility.

**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:

- on page 1 of the IEP, staff of Arch Bridge was not accurately or appropriately identified according to their roles as attending the PPT;
- documentation indicating the attendance of a representative from Arch Bridge at a placement PPT was not properly made on the IEP;
- the IEPs, specifically the *Special Considerations* section described on page 10, did not clearly articulate the supports/services required to address the level or significance of students' needs;
- one IEP reviewed represented a diagnostic placement that was not appropriately documented as such, did not articulate diagnostic goals and objectives, and was not reviewed every 10 days as required; and
- one IEP maintained a reference to the provision of a Board Certified Behavioral Analyst consultation taking place within the "mainstream," and no current school was identified on page 1 of the IEP.

**Issue:** Program administration indicated that the responsible LEA placed six students in the residential program for educational reasons and that in order to provide a free and appropriate public education, a residential placement was necessary. However, the IEP does not reflect such a placement or indicate the additional hours of support required to ensure that the student could access his/her special education program.

**Corrective Action Required:** Develop and document a process to review IEPs developed by the PPT to ensure that the IEPs accurately reflect the consensus of the PPT, are complete and accurate, reflect the current level/intensity of students' 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 30, 2018, submit to the BSE, a copy of the process/procedure developed to review IEPs. 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.

**Recommendations:**

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

- Explore the availability of, and access to, community-based transition opportunities in order to broaden options for students to develop vocational and trade skills necessary for postsecondary success.
- Explore opportunities for facility expansion specifically to address facility needs at the high school level as well as enhancement of the space utilized for instruction and related services. Also, consider the addition of a "sensory space" and environmental changes to enhance the instructional and clinical settings.
- Consider the implementation of Google Classroom in support of students and staff.

- Review the program description and website information to clarify that the affiliated residential program is available only to female students.
- Consider the provision of an instructional assistant at each level to support the differentiated instruction required for the range of students often enrolled at each grade.
- Consider expanding opportunities for students to participate in extracurricular activities on grounds.

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, if applicable. Upon receipt of Arch Bridge's written acceptance of this report in its entirety, a recommendation for program approval through June 30, 2024, will be submitted to the Commissioner of Education.

Upon such approval, the following will be applicable to Arch Bridge School:

<b>Ages Approved to Serve:</b>	6–21 years old
<b>Approved Capacity:</b>	51 students
<b>Approval Expiration Date:</b>	June 30, 2024

cc: Ralph Scafariello, Director of Education