




STATE OF CONNECTICUT  
DEPARTMENT OF EDUCATION



**TO:** Daniel Rezende, Chief Administrator  
Connecticut Junior Republic (Litchfield)

**FROM:** Colleen Hayles, Education Consultant   
Bureau of Special Education

**DATE:** June 8, 2020

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

On February 11, 2020, an evaluation team visited Connecticut Junior Republic special education program in Litchfield (CJR-Litchfield) to conduct an on-site review for re-approval. The team consisted of:

- Colleen Hayles, Education Consultant, Bureau of Special Education (BSE);
- Thomas Brant, Director of Pupil Services, Amity Regional School District No. 5; and
- Jeff Drew, Education Director, Whitney Hall School, The Children's Center of Hamden.

During a previous on-site visit on February 4, 2020, Colleen Hayles (BSE lead education consultant) 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 your administration.

At the exit conference on February 11, 2020, 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:**

- The delivery of highly individualized supports and services to students enrolled is provided through a strength-based, gender specific program within a structured instructional setting. The program promotes choice theory and implements a strength-based model where student needs are addressed through a trauma-informed approach imbedded within a framework of positive behavioral interventions and supports (PBIS).

- The culture and climate of the program promotes a strong “family atmosphere” (identified by both staff and students) where students demonstrate a strong connection with each other and staff and administration.
- The vocational opportunities available to students on campus are varied and the facility provides rich resources to support instruction in areas that include Animal Science, Plant Science (Landscaping and Horticulture), Graphic Arts, Automotive, Culinary Arts, and Wood and Construction Technology.
- CJR is currently accredited by the New England Association of Schools and Colleges. The advantage of such an accreditation is the ability for the school to provide a CJR diploma, which benefits unilaterally placed students, as well as, local education agency (LEA) placed students who have elected to forgo a district diploma through the planning and placement team (PPT).
- The high school program operates within a “synthesized curriculum” model, which meets Connecticut graduation requirements and provides “blended coursework” in the following clusters: Science, Technology, Engineering and Math; the Humanities (English, Language Arts, American Studies and Social Studies); and Career and Life Skills (Physical and Health Education, and Personal Finance).
- Small class sizes (3–5 students), the focus on trauma-informed care, and the introduction of community (schoolwide) breakfast and lunch, as well as, the opportunity for students and staff to convene twice a day as a community to “reset,” contribute an overall climate of caring, respect, and a recognition of each individual’s contribution to a community.
- The campus provides a working farm for students to integrate theory and practice for farming and animal science studies and provides opportunities for de-escalation or can be utilized as a privilege or reinforcing experience for a student.
- Students appear to thrive on the individualized flexibility available within the structure allowing for staff to recognize a student’s needs and address them within a highly supportive environment.
- Social/behavioral standards and expectations are consistently modeled by staff and are clearly apparent to students. The staff is well versed in the program’s philosophy, which is based on Positive Peer Culture and Choice Theory.
- A strong PBIS model and a focus on promoting de-escalation strategies provided through the implementation of therapeutic crisis intervention have been effective in supporting a trauma-informed, relational model and has effectively reduced or eliminated significant incidents requiring emergency interventions such as restraint or seclusion.
- A review of student files indicates that a weekly report of student progress is generated to provide students’/parents’ information regarding a student’s current status and his/her accomplishments/challenges. In addition to the progress reporting as scheduled in the individualized education program (IEP), these weekly reports are forwarded to the responsible LEA on a monthly basis, providing information related to a student’s current performance.

- CJR provides its graduates with a scholarship to further their education or pursue their employment interest.
- Staff have characterized professional development (PD) activities as relevant and applicable to their work and especially appreciate the opportunities for “self-directed” PD activities.

## 2. **Standard Deficiencies:**

The following standard deficiencies must be rectified:

**Standard F: Program Requirements** – A private facility shall have a written description of the IEP for each student, which should include, as appropriate, a behavior intervention plan (BIP); the student success plan; the language and communication plan; and transition goals and objectives that move the student toward college or career readiness, including opportunities to work and interact in the community, and shall have a written curriculum and sufficient instructional materials, supplies, and equipment in accordance with state requirements for educational programs for full implementation of the IEP.

**Issue:** In the IEPs reviewed, one or more of the following elements, specific to service delivery, were inaccurate or incomplete:

- Related services were not defined as needing to be provided in either a 1:1 or group setting.
- Service providers were identified solely as “special education teacher” in four of five IEPs when goals and objectives are addressed by general education teachers and paraprofessionals as well.
- One IEP articulated the implementation of a BIP, which is no longer applicable or recommended by the PPT.

**Corrective Action Required:** Submit to the BSE on or before August 15, 2020, an attestation that there is consistent implementation of the program’s IEP audit process to ensure that program supports and services, identified in the IEPs developed for students while placed in other settings, are reviewed by the PPT and determinations are appropriately reflected in the current IEP that such supports and services are or are not necessary for the student to receive an appropriate program in the current setting.

**Standard J: Health and Safety** - A private facility shall formulate written policies and procedures governing the prescribing and administration of medication to students. The program’s medical advisor shall annually review and approve these policies and procedures. These policies and procedures shall be disseminated and reviewed with all qualified school employees who have been trained to administer medication in the absence of a school nurse and shall be maintained on permanent file in accordance with Section 10-212(a).

**Issue:** The program benefits from the availability of a full-time nurse during the school day who would typically administer medication to students as needed. There are also a number of support staff who have been trained and certified by the Department of Children and Families (DCF) to administer medication within the residential program. However, Connecticut State Regulations require that in the absence of a school nurse, the principal, any teacher, licensed athletic trainer, licensed physical or occupational therapist employed by a school district, or coach of intramural and interscholastic athletics of a school may administer medication. Currently, there is no additional “certified” administrator, teacher, related service personnel, or coach trained to administer medication in the nurse’s absence.

**Corrective Action Required:** Discontinue the practice of allowing noncertified/licensed staff who have received medication administration certification through DCF, to administer medication to students during the school day in the absence of the school nurse. Provide documentation that a certified administrator, teacher, or related service provider has been trained by the school nurse or medical advisor to provide medication, as needed, in the nurse’s absence.

**Standard J: Health and Safety** - A private facility shall conduct emergency drills that shall include actual student evacuation to safe areas at least monthly in order to ensure that all staff on all shifts are familiar with the use of emergency notification equipment in the facility. The facility shall also evaluate the effectiveness of emergency plans and procedures. A record shall be maintained of such emergency drills that should include a drill other than a fire drill every third month.

**Issue:** Documentation of monthly emergency drills was available, however, drills were limited to fire drills and did not include a record that other types of emergency drills were conducted every third month.

**Corrective Action:** On or before October 30, 2020, submit a copy of the documentation indicating that emergency drills, which should include a drill other than a fire drill every third month, were appropriately conducted.

**Standard G: Evaluation of Student Progress and Reporting Responsibilities:** - The private special education program shall submit reports of each child’s progress based on the student’s IEP goals and objectives, to the responsible LEA or sending agency and to the parent/guardian in accordance with the reporting schedule and content requirements of the child’s IEP as determined by the PPT. These reports must be communicated in the language that is easily understood by parent/guardian. Each private facility shall notify and send written reports to parent/guardian and the sending agency regarding any disciplinary measure employed (in-school or out-of-school suspension) that substantially removes the student for extended periods of time from those program activities related to the child’s IEP.

**Issue:** While completed progress reports aligned to the IEP timelines were found in each student file, there was no indication in the student file that progress reports were forwarded to parents and LEAs. A sample cover letter to parents was provided to the team at the time of visit.

**Corrective Action:** On or before October 30, 2020, submit to the BSE a letter of attestation indicating that a cover letter to parents accompanies each progress report (as dictated in the IEP) and is maintained with the progress report in the student file. A sample cover letter to parents was provided to the team at the time of visit.

### **3. Recommendations:**

The following recommendations are offered to CJR (Litchfield):

- Consider teaming CJR program staff with public school colleagues and/or tapping into local districts’ PD offerings to remain current with general education content and expectations.
- Continue to expand community-based transition experiences and allow students to explore employment opportunities after graduation.

- Continue to explore opportunities to provide incentives to staff to support the recruitment and retention of staff.
- Encourage staff to visit and observe public school classes in their content area and provide opportunities for public school staff to observe within the CJR setting, to share and reinforce instructional practices and strategies.
- Explore opportunities to further involve parents in the program through both formal and informal opportunities.
- Consider expanding residential placement options to students placed by their school district or students placed in the educational program unilaterally by their parent(s). There are currently three distinct residential programs on the campus whose enrollment is restricted to students placed by DCF or the Court Support Services Division.

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. Upon receipt of your written agreement to, and acceptance of the report, a recommendation for program approval through June 30, 2025, will be submitted to the Commissioner of Education.

Upon such approval, the following will be applicable to CJR-Litchfield:

<b>Approved Ages to Serve:</b>	9–21 years old
<b>Approved Grades to Serve:</b>	4–12
<b>Approved Student Capacity:</b>	74
<b>Approval Expiration Date:</b>	June 30, 2025

CH:chh

cc: Jim Obst, Education Director