




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Brooke Violante Kelly, Chief Administrator
High Road School of Norwalk

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

DATE: May 23, 2019

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

On March 28, 2019, an evaluation team visited the High Road School of Norwalk (HRS Norwalk) 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);
- Yvette Goorevitch, Chief of Specialized Learning and Support, Norwalk Public Schools; and
- Linda Kapitan, Director of Education, Webb School.

During a previous on-site visit on March 21, 2019, Colleen Hayles 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 Norwalk administration.

At the exit conference on March 28, 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 program has made significant efforts to infuse trauma-informed care and mindfulness practices within a behavior oriented model. A level system of positive reinforcement is utilized across the program. Interventions are data driven and directed toward students to aid in the development of coping and self-regulation skills.

- Academic interventions are driven by each student's learning and language needs as identified through a tiered hierarchy of assessment. Individualized and intensive data-driven academic interventions are presented within a rotational model that provides direct instruction, support to new learning through review, reinforcement, and re-teaching and individualized web-based instruction.
- The program implements a variety of web-based products to support assessment and instruction.
- The program benefits from its ownership by Catapult Learning, a nationwide company serving students with disabilities in a variety of settings. Generally, instructional resources, data collection/management tools, and the availability of expertise via consultation from Catapult consultants/instructors, enhance individualized assessment and instruction, and positively impact student performance. Specifically, the proprietary software Academic, Behavioral, and Life Skills Education system (referred to as ABLE), provides a mechanism to track student gains across all areas and exemplifies HRS Norwalk's leadership among approved private special education programs to develop meaningful program performance measures.
- Individual student binders that are available within the classroom promote connections to students' individualized education programs (IEPs) and their daily, weekly, and monthly progress toward the achievement of goals/objectives within their IEPs.
- The program engages in a continuous improvement initiative based on analysis of data, which among other improvements, has resulted in a review of the rotational model and an increase in the amount of time devoted to direct, individualized instruction by the classroom teacher.
- The climate and culture of the school reflects the mission and the CORE Values as described by the program; transparency (communicate clearly, openly, and directly), decisiveness (demonstrate a bias for action), humility (acknowledge and learn from mistakes) and, accountability (embrace personal ownership).
- The program provides staff with daily opportunities for debriefing and weekly meetings to review and update student progress and concerns.
- All students participate in a schoolwide program of positive behavioral supports, as well as a level system based on a token economy. In addition to a professional learning community that meets to support preventive strategies and interventions, a process to address the needs of students whose behavior warrants additional support, such as a recommendation for a functional behavioral assessment, is in place through the quality risk and safety committee.
- Students benefit from strong community connections, which have been cultivated by the transition coordinator. Through these affiliations, students can access a variety of community settings and activities in preparation for post-school success. These connections also provide students with an opportunity to give back to the community.

- An increase in academic rigor has been promoted by the administration and supported through an individualized, data-driven model of tiered instruction and intervention.
- Students have access to a variety of initiatives and programs designed to combat bullying (i.e., Rachel's Challenge), promote community involvement, and establish a positive relationship with authority and law enforcement within the community (Coffee with COPS).

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 after 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.

There was no evidence in the staff files reviewed, that the CSDE Educational Employer Verification form was completed for employees hired after July 1, 2016.

Corrective Action: Provide an attestation to 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.

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.

Issues:

- 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 three of five IEPs reviewed, the provider of specialized instruction identified on the service delivery grid was limited to the special education teacher, which does not characterize the model implemented at HRS of Norwalk.

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 as identified above. 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, emergency drills were not documented to have occurred between May 2018 and October 2018, illustrating a gap during the course of the extended school year (ESY) program.

Corrective Action: On or before June 30, 2019, submit to the BSE an attestation that the program will conduct and maintain documentation indicating that the required emergency drills were conducted throughout the ESY program.

Recommendations:

The following recommendations are offered to HRS Norwalk:

- Review hiring procedures to ensure that all background check documentation is submitted within 30 days of hire and that the information in the staff file illustrates a timely submission.
- Provide additional training to the instructional assistants to further develop and support their roles related to assisting teachers in the provision of academic instruction, monitoring, and documenting academic growth under the supervision of the classroom teacher.
- Ensure that in addition to the professional development (PD) provided through the program's annual plan, closely examine individual teacher's strengths and areas identified for further development. Ensure that PD activities are designed to improve individual teacher skills, which will have a positive impact on teacher outcomes.
- Explore the use of iPads or similar devices to collect data in an effort to minimize the redundancy of collecting data and then entering the data utilizing software at a later time.
- Provide PD that explores additional opportunities for further differentiation of instruction, specifically during larger group instruction (i.e., social studies, science, etc.).
- Continue to pursue the addition of a part-time or full-time social worker to enhance available supports to students and their families.

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 HRS Norwalk:

Approved Ages:	5–21 years old
Approved Grades:	K–12
Approved Capacity:	40 students
Approval Expiration Date:	June 30, 2024

cc: Ronda Turcotte, Director of Education