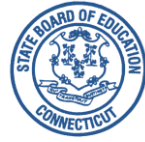




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Jill Bourbeau, Chief Administrator
Rushford Academy

FROM: Dori Papa, Ed.D., Education Consultant ^{SP}
Bureau of Special Education

DATE: June 15, 2021

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

Please note: This Approved Private Special Education Program approval review was conducted remotely due to the current public health and safety requirements resulting from the COVID-19 pandemic. All required activities and components, as defined in the *Principles, Procedures and Standards for the Approval of Private Special Education Programs*, were conducted remotely and in accordance with the approval process.

On April 29, 2021, an evaluation team conducted a virtual site visit review for re-approval of Rushford Academy special education program. The team consisted of:

- Dori Papa, Ed.D., Education Consultant, Bureau of Special Education (BSE);
- Aimee Turner, Director of Special Education, Wallingford Public Schools; and
- Linda Zunda, Chief Executive Officer, Elizabeth Ives School for Special Children.

During previous virtual site visit on April 27, 2021, Dr. Papa reviewed the education files of students, as well as personnel files. In addition, Dr. Papa reviewed the application materials submitted to the BSE by your staff.

At the exit conference on April 29, 2021, 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:

- Staff interviewed reported that the education director is extremely supportive, hands-on, highly visible, encourages collaboration, and very responsive to staff and student needs.

- Positive, respectful, and trusting relationships are well-established between staff and students.
- Small class sizes of four to six students promote student engagement, individualized academic instruction, and close monitoring of each student’s emotional status.
- The overall climate of and culture of Rushford Academy is positive, reinforcing, and has a relaxed atmosphere.
- Teacher and related service provider interview responses evidenced their solid understanding of the individualized education program (IEP) process. The program is very student-centered with students very involved in the development of their IEP goals and objectives and students also attend their planning and placement team (PPT) meetings.
- Classrooms are bright, spacious, have natural lighting, and student work products displayed on the walls. Students are allowed to choose a poster from the teacher’s room to take with them upon exiting the program.
- Staff share an appreciation for the need for collaboration and teamwork. Staff reported that they are always there to support each other and “have each other’s back.”
- The observation team reported evidence of well-planned instruction aligned with the IEPs and Connecticut Core Standards at the high school level. Lessons were creative and the teacher validated student responses, which encouraged ongoing student discourse. Students were paired up during a lesson that fostered student interaction.
- Staff reported that they are satisfied with the amount of professional development and the diverse topics offered. Staff is allowed to attend outside professional development activities of specific interest and receive reimbursement from the program.
- A related service provider interviewed shared that the school team is highly collaborative and that there is a “real team feeling” among staff in the program.
- The program has vocational programming and community partnerships. One partnership is with the local humane society where students work together to help animals in need and learn skills such as cleaning, filing, interacting with various members of the humane society staff and general public, and problem solving.

2. **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 (IDEA), 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; CGS Sections 10-76a to 1076q, inclusive, and the current Connecticut regulations adopted thereunder, related to reporting of child abuse and

neglect, and bullying; and the prohibition of the use of restraint and seclusion in schools, and all other relevant federal and state laws and regulations and local requirements.

Issue: In two (2) of five (5) IEPs reviewed, there was no evidence that a teacher from the program was present at the PPT.

Corrective Action: Provide attestation to the BSE on or before June 30, 2021, that moving forward and in the absence of a special education teacher, the program will have a substitute attend scheduled PPT meetings.

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 enrolling 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 PPT, which discusses and determines placement in the facility prior to enrollment.

Issue: In four (4) of five (5) 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.

Corrective Action: Implement a procedure to be utilized upon receipt of an IEP after participating in a PPT meeting to ensure that all the information in the IEP is complete and accurate and Rushford Academy can implement the supports and services outlined in the document as written (i.e., require clarification of all related service whether it is provided individually or within a group setting). The review and any subsequent communication with the responsible district must be done in a timely manner and must then be reflected in the student file. It is strongly recommended that written documentation of requested changes in the IEP be attached to the current IEP to ensure that the IEP can be implemented with fidelity. Submit to BSE copies of the next three (3) 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 H: Qualifications and Requirements for Instructional, Administrative, and Support Personnel

The private facility shall maintain a permanent individual personnel file for each employee and shall ensure said file is held confidential. The private facility shall require that prior work references be on record for all applicants and that the applicant submit to a records check of the Department of Children and Families Child Abuse and Neglect Registry before hiring staff who will work directly with students. The private facility shall obtain the information listed on the *State of Connecticut 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, an approved private special education program, 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. In addition, state and national criminal history records check (fingerprinting) of staff who work directly with students shall be submitted within 30 days of hire and on file within 60 days from the date of employment. CGS Section 10-221d.

Issue 1: In three (3) of five (5) personnel files reviewed, there was no evidence that a State of Connecticut Educational Employer Verification form was completed for three (3) employees hired after July 1, 2016, in accordance with Public Act 16-67.

Issue 2: In two (2) of five (5) personnel files reviewed, there was no evidence that a state and national criminal history records check (fingerprinting) of staff who work directly with students was submitted within 30 days of hire and on file within 60 days from the date of employment. CGS Section 10-221d.

Corrective Action: Develop and implement a process for maintaining the necessary documentation within the staff file which includes the verification that a State of Connecticut Educational Employer Verification form and fingerprinting for criminal background checks were completed. On or before June 30, 2021, submit to the BSE a checklist to be used (which includes all required/recommended items) to ensure appropriate documentation and verification within each personnel file and consistency across personnel files.

3. Recommendations:

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

- Explore opportunities to improve information technology support and connectivity availability through Hartford Health Care or the implementation of an independent carrier to support internet accessibility within the school program.
- Increase opportunities for both students and staff to benefit from greater access to technology. This is essential given the academic/cognitive strengths of students enrolled and would further support preparation for postsecondary education and employment.
- Develop a clear curriculum with scope and sequence aligned with the Connecticut Core Standards and public high schools.
- Increase the involvement of parents/guardians in the IEP development process including related service programming.

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 and acceptance of the entire report, a recommendation for program approval through June 30, 2025, will be submitted to the Acting Commissioner of Education.

Upon such approval, the following will be applicable to Rushford Academy:

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| Approved Ages to Serve: | 13–22 years old (Grades 8–12) |
| Approved Student Capacity: | 16 students |
| Approval Expiration Date: | June 30, 2025 |

cc: Katelyn Gomes, Education Director