



Thank you for the opportunity to provide feedback on the report distributed by the Office of the Child Advocate (OCA) and Disability Rights Connecticut (DRCT). High Road Schools of Connecticut would like to acknowledge both agencies, the Connecticut State Department of Education (CSDE) and our district partners, as key advocates for students with the greatest need and who require more intense support during their educational experience.

The mission of High Road Schools has been to serve students with a broad range of needs by providing support, education, and the tools they need to achieve success and enjoy rewarding futures. High Road Schools are designed to serve students with academic, behavioral, and emotional disabilities in a non-clinical setting. Our behavioral supports and curricula are developed, reviewed, and enhanced by the nation's leading and respected experts in K-12 specialized education, Drs. Diane Myers and Ellen Gaske¹. We also routinely work with many internal and external experts that visit our schools, review student data, and provide insights into enhancing our programs.

As a respected partner to more than 45 LEAs across the state of Connecticut, High Road Schools understands the increased responsibility that comes with the services we provide. We are a mission-driven organization that continuously seeks ways to enhance our processes and performance to best serve our student population. While we have concerns about the manner in which this investigation was conducted and challenge many of the findings in the resulting report, certain observations during the investigation process were constructive. We swiftly implemented changes in response to the feedback and shared those updates and their outcomes with OCA and DRCT.

In fact, this spirit of continuous improvement in how we serve students and operate our schools has allowed us to implement many innovative processes, protocols, and platforms to gain insights and actionable information. We have outlined below some of the many enhancements we have made because of welcome, continual feedback from our district partners, experts in the field, and routine state and agency visits to our schools including those conducted by the OCA and DRCT.

Over the past couple years, we installed a comprehensive student information system across all our schools to gather real-time data related to student behavior and academic outcomes to provide immediate feedback to our staff in the field, and to improve aspects of academic and behavioral programming. We are committed to finding data-driven insights to guide our decisions in the pursuit of positive student outcomes.

Students enrolled in High Road Schools require significant behavior support and de-escalation strategies. Our

¹Diane Myers, PhD, is Senior Vice President of Behavior Support since 2020. Her prior academic appointments include serving as Professor of Special Education and Chair of the Department of Teacher Education at Texas Woman's University. Dr. Myers's research interests include implementing positive behavioral interventions and supports at the school, classroom, and individual student levels; teacher training and professional development; classroom management; and supporting students with challenging behavior. The author of numerous scholarly works, she is coauthor of [Classwide Positive Behavior Interventions and Supports: A Guide to Proactive Classroom Management](#) and [Implementing Classwide PBIS: A Guide to Supporting Teachers](#).

Ellen Gaske, PhD is Senior Vice President of Academics since 2014. Ellen's prior academic experience includes serving as an educator at Johns Hopkins University. Ellen earned her Ed.D. in Special Education and Learning Disabilities and a Master of Science in Communicative Disorders from Johns Hopkins University, and a Bachelor of Science in Education and Special Education from the University of Maryland. Ellen served a 4-year term on the Maryland Association of Special Education Facilities (MANSEF) Board. Ellen currently serves as a member of University of Maryland's Board of Trustees and on the Board of Visitors for the School of Education.



behavioral model ensures we can provide this level of support while ensuring students' safety. We monitor and report all restraints and seclusions. In response to feedback, and effective fall 2022, High Road Schools centralized its training program and appointed a regional training director so that de-escalation and restraint techniques are consistent across all High Road Schools. We reduced the number of restraints utilized in our programs by 24% during the 2022-2023 school year, demonstrating our dedication to using these techniques only as a means of last resort where a student is at risk of harming themselves or others.

High Road Schools are committed to hiring qualified team members who are mission-driven to provide a positive, supportive environment for students. While the report notes issues with documentation of employee background checks, currently, 100% of background checks and employer verifications for our employees are complete. Candidates must undergo a comprehensive background check as dictated by state requirements prior to hire, including criminal history background checks through fingerprinting.

We understand this report serves as a formal complaint to CSDE and High Road Schools welcomes the opportunity to have a more comprehensive forum and dialogue with CSDE to demonstrate our quality programming and ongoing compliance with state and federal regulations. Our decades-long relationship with both the CSDE and our local LEA partners has provided us effective supports for nurturing our students along their educational journey.



Leslie Torres-Rodriguez, Ed.D.
Superintendent

Jennifer Hoffman
Asst. Superintendent for Special Education
and Pupil Services

February 27, 2024

Dear Attorneys Brown & Eagan,

Thank you for taking the time to meet with the Hartford Public Schools administration to review the OCA/DRCT Investigative Report. In an effort to work collaboratively with OCA, a brainstorming session was held on February 8th, 2024 to determine potential next steps to address concerns from OCA's investigative report, but to also determine ways for HPS to continue to grow in-district programming in order to ensure our most vulnerable students have access to LRE in their community, with providers who understand their unique learning needs. Below is a summary of the ongoing collaborative meetings held between HPS and OCA/DRCT, to not only discuss concerns but to brainstorm ideas to provide equitable access for all students.

- Beginning July 15, 2022, HPS has been responsive to the subpoena and subsequent conversations about students attending various High Roads programs.
- In December of 2022, OCA launched the investigation.
- In December 2022, HPS provided a response.
- On February 2, 2023, HPS district leaders met with you to discuss observations conducted at HR programs.
- Unrelated, but in May 2023, OCA asked HPS to share with parents the ability to request parent training under related services. HPS responded that this information is posted on the new website.
- On October 26, 2023, HPS received the Draft Investigative Report.
- On November 13, 2023, HPS provided a response to the Investigative Report.
- The District and OCA/DRCT met on January 10th, 2024 to review initial findings.
- On January 31, 2024, following receipt of information from OCA regarding the specific students referenced in the investigation report, the District provided additional clarification of the initial report and to provide records not initially captured in the November 2023 response.

- On February 8th, the Superintendent, Assistant Superintendent, and Attorney Eagan met to discuss big picture points the district could leverage in order to best meet the needs of all HPS students.

1. Our continued efforts towards becoming a trauma-responsive system.

- Continued focus and training with all schools in the areas of Restorative Practices and Trauma-informed Practices.
- During and since the pandemic (2022-present), all paraeducators have engaged in professional learning designed to target Adult Social and Emotional Learning (SEL). This has been provided through a book study in the school year 2022-2023, *Permission to Feel*, by Dr. Marc Brackett as well as 2023-2024 with *Educator Wellness* by Kanold. This intense work, coupled with the Crisis Prevention Institute, has provided a framework for our paraeducators to use with students in their everyday work.
- Paraeducators are trained in CPI, most importantly, which focuses on de-escalation strategies.

2. The need for additional/external funding in order to pilot a strategic talent initiative to meet our Special Education staffing needs. This focused on paraeducators as part of the pipeline.

- While the District and the Nation continue to face vacancies, HPS is committed to ensuring that in-person staff is available for every student.
- Potential workforce development focused on identifying potential graduates to become paraeducators, and also identifying paraeducators to enter into the district's RELAY program.
- In order to accomplish this, we look to build capacity and grow in-district programming
- There has to be comparable salary and work conditions to open additional in-district programming in addition to teachers, paraeducators, administrators, BCBA and BT's.

3. Collective acknowledgement that more work needs to be done, between external systems, to reduce the stressors for families that are sending students to school and need support regulating behavior responses.

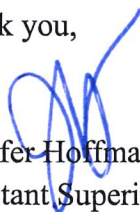
- Next Steps:

- Expanding capacity in district special education program offerings:
 - RISE: Potential for adding classrooms (elementary, middle and high school)
- Equitable practices

- The District to work with the Mayor and his team on preventative measures for Tier 1 strategies.
 - Ensuring that students have access to activities everyday.
- The District has worked to ensure that in each zone, there are in-district programs for students to attend.
- New K-5 and 6-12 ELA curriculum, in line with the State's initiative, Right to Read. The special education team has been engaged in planning, learning and implementing the new curriculum.
- Continued focus on the districts MTSS process and providing strategic interventions for students at Tier 2 and 3
 - Grant funded work to support this initiative.
 - Potential work in-district to enhance de-escalation strategies to reduce the use of Restraint/Seclusion.
- Monitoring/oversight of outplaced students:
 - Observation of students
 - HPS will commit to quarterly Central Office observations of programming.
 - Qualifications of outplacement staff
 - HPS will continue to meet with APSEP Directors to ensure certified staff are providing services.
 - Progress monitoring/data review
 - HPS Special Education Director and team will request IEP progress monitoring data, in addition to FBA and BIP data.
 - Setting criteria for return to less restrictive programs
 - HPS Special Education team will begin discussion for setting criteria to be in place for 2024-2025.
 - Monitoring student engagement/attendance
 - HPS Special Education team has a process to monitor, however, it can be reviewed.
 - Requiring FBA/BIP development
 - HPS will work with APSEP Directors to ensure implementation as well as revisions occur.
 - Response to use of seclusion/restraint
 - HPS will work with APSEP Directors to discuss at quarterly meetings, as well ensuring constant communication with HPS.
 - Ensuring access to related services required in the IEP
 - Ensuring access to special areas such as art, music, PE, health

HPS is committed to ensuring our students receive the services they require as described in their respective IEPs and under FAPE.

Thank you,



Jennifer Hoffman

Assistant Superintendent for Special Education and Pupil Services

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