

# STATE OF CONNECTICUT DEPARTMENT OF EDUCATION



**TO:** Gary Hunt, Chief Administrator

High Road School of Fairfield County

**FROM:** Dr. Dori Papa, Education Consultant

Bureau of Special Education

**DATE:** July 19, 2024

**SUBJECT:** PRELIMINARY EVALUATION REPORT

Approval Review for a Private Special Education Program

On April 11, 2024, an evaluation team visited High Road School of Fairfield County (HRS Fairfield County) to conduct a program reapproval review. The team consisted of:

- Dr. Dori Papa, Education Consultant, Bureau of Special Education (BSE);
- Meghan Osowiecki, Director of Special Education, Stamford Public Schools; and
- Samantha Cook, Education Westport Day Schools.

During a previous site visit on April 10, 2024, Dr. Papa reviewed the education files of students as well as personnel files. In addition, Dr. Papa has reviewed the application materials submitted to the BSE by your administration.

At the exit conference on April 11, 2024, the evaluation team shared its impressions and preliminary findings. The approval process included a review of the program's:

- 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.

## **Expanded Program Approval Review Process:**

In response to concerns raised by the Office of the Child Advocate and Disability Rights of Connecticut in their March 12, 2024, High Roads Investigative Report, the Connecticut State Department of Education (CSDE) included in its review process additional investigations of staffing credentials, hiring practices, and restraint/seclusion procedures above and beyond the standard review process. The program review team inspected all educational and administrative staff files. The file review process included, but was not limited to, a review of data and records for certification credentials and evidence that the program has

consistently conducted state and national required criminal records and fingerprinting checks, and a Department of Children and Families (DCF) background check, in accordance with Connecticut General Statutes (C.G.S.) Section 10-221d. The personnel file review process also included a review of all special education program administrators, instructional, and related services personnel files in accordance with Standard I: Qualification and Requirements for Instructional, Administrative, and Support Personnel of the Connecticut State Department of Education, *Principles, Procedures and Standards for the Approval of Private Special Education Programs (February 2021)*.

#### **Commendations**:

HRS Fairfield County addresses the academic, social, emotional, and behavioral needs of students with exceptionalities through a supportive and structured environment. The program offers related services, including occupational therapy, physical therapy, speech and language therapy, social work, and school psychological services.

Staff interviewed expressed they "really appreciate" the education director, and described her qualities as well-organized, supportive, with a wealth of knowledge, and involved in all aspects of the program.

The program is housed in a charming older building. The CSDE Standards Evaluation Team described the climate as calm, inviting, friendly and positive. A positive culture and climate are established and are evidenced by respectful relationships observed among students and between staff and students with an abundance of positive praise and warm smile exchanges. The CSDE team was warmly welcomed. The program staff were extremely courteous and accommodating throughout the site visit.

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. Community-based partnerships include St. Philip Roman Catholic Church, Stew Leonard's, Petco, Westport Book Shop, Stop and Shop, Hawley Lane Shoes, Norwalk Police Department, and Norwalk Fire Department. These connections also provide students with opportunities to give back to the community.

The program offers transition students with in-house activities, including assisting in the school's Deli, Bakery and Plant Room. Students engage in activities to develop retail skills, including order completion, customer service, and inventory ordering.

The CSDE Standards Evaluation Team characterized the learning environments as "spacious, well-organized, calm, and conducive to meeting the academic, social, and emotional needs of students." Classrooms are equipped with round tables for group lessons, as well as individual lesson reinforcement activities with a paraeducator, and study carrels in which students may work independently.

The program provides staff with daily opportunities for debriefing and weekly meetings to review and update student progress and concerns.

The program has a shared classroom space for art and music lessons delivered by special education teachers, which provides students with opportunities to express their creativity and to build skills and knowledge that will help them through school, career, and provide a means for expression and connection with others.

The program has invested in technology to support teachers in their instruction, and students in their learning. Each classroom is equipped with an interactive Smart Board, iPads, student Chromebooks, and laptops for each teacher. During an English Language Arts lesson observed, the teacher started the lesson

with students watching a video on informative writing. Following the video presentation, the Smart Board was utilized for students to engage in an interactive group activity.

The team reported evidence of well-planned instruction, aligned with Connecticut Core Standards. Students appeared engaged and attentive during individual instruction, reinforcement, and independent academic activities. A connection between instruction and the goals and objectives identified in the individualized education programs (IEP) provided by the respective students' home districts was evidenced in each classroom.

The program employs a doctorate-level board-certified behavior analyst (BCBA) who supervises the conduct of functional behavior assessments (FBAs) and the development of behavior intervention plans (BIPs). Additionally, a part-time BCBA has recently been hired to work between HRS Fairfield County and another High Road program. The newly hired part-time BCBA will also work to conduct FBAs and develop BIPs for all students, model and train staff, and meet regularly as part of the multi-disciplinary team to revise BIPs as needed.

The program employs an academic and curriculum instruction (ACI) specialist who plays crucial roles in education, focusing on specific subjects to ensure that content and teaching methods meet educational standards. The ACI is responsible for developing curriculum materials, providing teachers with professional development (PD), and assessing instructional strategies in collaboration with teachers and administrators. Additionally, the ACI specialist contributes to the design of comprehensive educational programs, conducts reviews, and guides the creation of effective curricula. The ACI collaborates with teachers to enhance teaching practices, model effective techniques, and supports the implementation of innovative instructional methods. The program's education director shared that, "the strategic addition of an ACI aims to bridge the gap between theory and practice, foster continuous improvement in teaching quality, and positively impact student achievement."

An assessment, curriculum, and instruction model are supported by the availability of a combination of online and hands-on curricula for teachers to utilize, including Wilson, SPIRE, Edmark, Unique Learning Systems, Mystery Science, Touch Math, Generation Genius, Attainment, and Houghton Mifflin Harcourt for Science and Social Studies.

The program engages in a continuous improvement initiative based on analysis of data. The program employs a systemic, academic rotational model that is based upon individualized assessment data and is designed to align curriculum and instruction with each student's readiness level. The model includes teacher-directed instruction, assistant teacher instruction, independent seatwork, and technology-based workstations. Individualized daily schedules reflect differentiated instruction aligned with readiness levels in reading, English/language arts, and math.

An IEP binder is maintained in each classroom for each student. IEP binder availability within the classroom promotes connections to students' IEPs and their daily, weekly, and monthly progress toward the achievement of goals/objectives within their IEPs.

#### **Standard Deficiencies:**

HRS Fairfield County must rectify the following standard deficiencies:

**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 student enrollment. 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, which discusses and determines placement in the facility prior to student enrollment.

**Issue:** In one (1) of five (5) student files reviewed, there was no evidence that the program's special education teacher attended the annual PPT meeting.

**Corrective Action**: Submit to the BSE copies of the next five (5) IEPs for PPTs held after the placement PPT evidencing an HRS Fairfield County special education teacher participated as the representative of the HRS Fairfield County program.

Standard I: Qualification and Requirements for Instructional, Administrative, and Support Personnel - Each private facility shall require that prior work references be on record for all applicants. Furthermore, before hiring staff who will work directly with students, the private facility shall ensure that the applicants submit to a DCF Child Abuse and Neglect Registry records check. The private facility shall obtain the information listed on the *State of Connecticut Educational Employer Verification* form from ALL the applicant's current or former employer(s) 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. 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 written communication or telephonically. In addition, state and national criminal history records check (fingerprinting) of staff who work directly with students, shall be submitted within thirty (30) days of hire and on file within sixty (60) days from the date of employment. C.G.S. Section 10-221d.

**Issue 1:** In nine (9) of twenty-five (25) personnel files reviewed, there was no evidence that a state and national criminal (fingerprinting) history records check was submitted within thirty (30) days from the date of employment. The most recent instance of this infraction occurred July 5, 2022. Evidence of those submissions was provided; however, they had not occurred within thirty (30) days from the date of employment.

**Issue 2**: In three (3) of twenty-five (25) personnel files reviewed, there was no evidence of submission to DCF Child Abuse and Neglect Registry records check prior to hire. Evidence of those submissions was provided; however, they had not occurred prior to hire.

It is important to note that all current personnel have had a DCF Child Abuse and Neglect Registry check. The late submission of these checks for three (3) employees ranged from four (4) months to 1.8 years.

**Corrective Action(s) - Issues 1 and 2:** On or before July 31, 2024, submit to the BSE attestation that the program will ensure that state and national criminal history records check (fingerprinting) of staff who work directly with students will be submitted within thirty (30) days of employment and on file within sixty (60) days from the date of employment. Furthermore, the program will ensure that applicants working directly with students will submit to a DCF Child Abuse and Neglect Registry records check before hire. C.G.S. Section 10-221d.

Submit verification to the BSE evidencing that the national criminal database background checks (fingerprinting) were submitted within thirty (30) days of employment and on file within sixty (60) from the date of employment for <u>all</u> employees hired (involving direct student contact) during the 2024-25 school year.

Submit verification to the BSE evidencing that prior to hire, DCF Child Abuse and Neglect Registry checks were appropriately completed for <u>all</u> potential employees (involving direct student contact) for the 2024-25 school year.

On or before July 31, 2024, develop and submit to the BSE an index or documentation to utilized and ensure that the conduct of all appropriate background checks has become a part of the HRS Fairfield County hiring practices in accordance with C.G.S. 10-221d. Submit to the BSE a written program onboarding policy and procedure to ensure compliance with C.G.S. Section 10-221d.

### **Recommendations:**

The BSE offers the following recommendations to HRS Fairfield County:

Consider exploring real-time, ongoing digital academic and behavioral data collection systems. The program currently has a paper-based data collection system. A teacher interviewed expressed that the current data collection process is "inconsistent." IEP goals and objectives appear on the back of each student's individualized weekly lesson plan and progress monitoring data is tracked manually.

Continue efforts to hire additional board-certified behavior analysts (BCBAs) to work under the program's lead, doctoral level BCBA to provide supports for staff and students throughout the program. As shared by program administration, the program is seeking to hire additional board-certified behavioral analysts (BCBAs).

Consider providing additional opportunities for training in the Connecticut Special Education Data System and IEP Quality Training when planning the 2024-25 PD activities. A teacher interviewed expressed the need to acquire additional knowledge and skill in these topic areas.

Maintain a balance of internal and external PD opportunities. Consider exploring the menu of activities and events available through the Connecticut State Education Resource Center (SERC) for teachers, paraeducators, and related service personnel (SERC Home page) (SERC PD Events Calendar). Identified PD should be based on data obtained by the Professional Development and Evaluation Committee and align with performance evaluation outcomes and educational staff's areas of continued growth within their evaluation plans.

Consider hiring a full-time school psychologist to support the academic behavioral and mental health student needs through frequent collaboration with parents, teachers, administrators, and others to best meet the diverse needs of students. Currently the program contracts with a consulting clinical psychologist.

Familiarize program administration and professional staff with the <u>Connecticut Guidelines for Educator</u> and <u>Leader Evaluation and Support 2023</u> for implementation in the 2024-25 academic year. Refer to scheduled training dates on the CSDE Talent Office website. <u>Talent Office (ct.gov)</u>.

Provide opportunities for teachers and related service personnel to visit and observe public school classrooms as well as other nonpublic school settings where students may transition upon PPT recommendation. A clear understanding of the expectations, (academic and social/emotional) instructional models, and level of expected self-advocacy will assist in preparing students for this transition.

Consider contracting with a local gymnasium to provide students with additional physical exercise opportunities. The school building does not have a gymnasium. The "motor lab" space is utilized for

physical education as well as the "church field" as an outdoor space. A related service staff interviewed suggested building an outdoor space with playground equipment and a basketball court.

Within fifteen (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 High Road School of Fairfield County's written agreement and acceptance of the entire report, a recommendation for program approval through June 30, 2027, will be submitted to the Commissioner of Education.

Upon such approval, the following will be applicable to High Road School of Fairfield County:

**Approved Ages to Serve:** 5 through 22 years old

Approved Grades to Serve:K through 12thApproved Enrollment Capacity:40 studentsApproval Expiration Date:June 30, 2027

DP:dpp

cc: Alyssa Kochiss, Education Director