



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Mr. Thomas Czarkosky, Chief Administrator
Manchester Memorial Hospital Clinical Day School

FROM: Dr. Dori Papa, Education Consultant *DP*
Bureau of Special Education

DATE: June 15, 2022

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

On December 9, 2021, an evaluation team (the team) visited the Manchester Memorial Hospital Clinical Day School (MMHCDS) to conduct an on-site review for reapproval. The team consisted of:

- Dr. Dori Papa, Education Consultant, Bureau of Special Education (BSE);
- Dr. Beth Giller, Director of Pupil & Staff Support Services, Coventry Public Schools; and
- Dr. Ed Orszulak, Education Director, Futures School.

During a previous site visit on December 7, 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 administration.

At the exit conference on December 9, 2021, the team shared its impressions and preliminary findings and reviewed the following areas of the special education program:

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
termination of enrollment

Commendations:

When interviewed, teaching and related service staff shared that administration has a strong vision for the school, fosters collaborative teamwork, is organized, and is highly visible and accessible to provide staff support. Teachers shared that they are very comfortable with both

the education director's and chief administrator's frequent visits into their classrooms. The education director makes a point to encourage, engage, and listen. All staff feel their input is valued and they have a voice at the table.

The staff demonstrates a strong commitment to the well-being of each student. The team ascertained that there is an excellent rapport between teachers and students—evident through smile exchanges, laughter, and positive comments. The team shared, “overall there is a sense of positivity in the environment evidenced by the language and communication in the classrooms observed—affirming and positive.”

During an interview, a related service provider shared that they “really like working here because school and clinical work is married.” The school has a social work team that collaborates closely with teachers to provide push-in service delivery within the classrooms.

A program strength is school and home communication. Teachers communicate with families on a daily basis in addition to making home visits, to provide instruction to students who do not attend school consistently. Families are integrally involved in the individualized education program (IEP) development process. Staff executes extensive work to support families and to ensure they connect with the outside resources needed.

Classroom observations evidenced that teachers had identified goals and objectives, which were clearly stated and posted during the course of the lesson (lesson content aligned to the Connecticut Core Standards). During observations, students were engaged in their instruction and demonstrated a willingness to take risks.

Paraeducator support was available as identified in students' IEPs. The team observed paraeducators utilizing fading and prompting techniques as appropriate.

The school has invested in technology that supports teachers in their instruction and students in their learning. Each classroom has a whiteboard with an Epson overhead projector and Chromebooks are accessible to students.

Standard Deficiencies:

Manchester Memorial Hospital Clinical Day School must rectify the following standard deficiencies:

Standard E: Individual Student Records - A private facility shall maintain a written record for each student, which shall include administrative, treatment, and educational data from the time of admission until the student leaves the program. A student's individual record shall contain, but not be limited to:

- reports to parents and school districts regarding progress toward achieving IEP goals and objectives in accordance with the IEP-delineated reporting schedule;
- dated documentation that the progress reports were forwarded appropriately; and
- cumulative health records.

Issue 1: In one of five student files reviewed, there was no documentation indicating that MMHCDS appropriately forwarded progress reports to the placing local education agencies (LEAs), even though IEPs and progress reports were evident in the file.

Issue 2: In one of five student files reviewed, there was no documentation indicating that MMHCDS appropriately forwarded progress reports to the parent(s), even though IEPs and progress reports were evident in the file.

Issue 3: In one of five student files reviewed, there was no evidence of health records.

Corrective Action: On or before June 30, 2022, submit to the BSE an index or organizational format that MMHCDS will consistently use for student files, to ensure that all required components are contained in each student's education records. Refer to CSDE *Application for Approval of a Private Special Education Program*, Section R Student Files, page 33, Item 99b, for a list of required student file documents, to contain in the student education file. In addition, the format must allow easy access and reference for administrators, teachers, related service personnel, LEAs, parents, and others who may need access in order to gain insight of students served and, to ensure implementation of a student's individual program with fidelity. Additionally, develop a protocol for obtaining student health records from placing LEAs prior to enrollment.

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 student enrollment and at least annually thereafter. 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. For students placed by other agencies, the private facility should obtain an IEP after placement as soon as feasible from the district having educational jurisdiction.

Issue 1: In two of five IEPs reviewed, the related services were not appropriately, reflected on page eleven—counseling services were not clearly identified as being provided individually or within a small group.

Issue 2: In two of five IEPs reviewed, there was no MMHCDS staff/representative listed on page one evidencing a representative from the school attended the placement PPT and one placement PPT IEP was not available in the file and could not be located.

Corrective Action: Implement a procedure to utilize prior to finalization of an IEP after participating in a PPT meeting. Said procedure shall ensure that all the information in the IEP is complete and accurate; allows the ability for documenting a process, to ensure the IEP accurately reflects PPT consensus; and that MMHCDS 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).

Submit to the BSE copies of the next three IEPs developed by the LEA's PPT for students enrolled. The copies shall demonstrate careful review for accuracy and completeness. Illustrate the written notification to the district, to request necessary changes.

Standard I: Qualifications and Requirements for Instructional, Administrative, and Support Personnel - Each private facility shall ensure the following:

The private facility shall maintain a permanent individual personnel file for each employee and shall ensure said file is confidential. The private facility shall require that prior work references be on record for all applicants. In addition, the private facility shall ensure the applicants submit to a Department of Children and Families (DCF) Child Abuse and Neglect Registry records check 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 an applicant if such employer was a local or regional board of education, an APSEP, 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. For staff who will work directly with students, state and national criminal history records check (fingerprinting) shall be submitted within thirty days of hire and on file within sixty days from the date of employment. Connecticut General Statutes (CGS) Section 10-221d.

A private facility shall have a written plan(s) for ongoing personnel development, including a professional development policy. Such policy shall include provision of a minimum of eighteen hours of professional development to staff each year at no cost, professional development opportunities aligned to individual educator evaluations supporting areas of identified need, and the proper documentation of professional development activities.

Issue 1: In five of five personnel files reviewed, there was no documentation evidencing completion of a *State of Connecticut Educational Employer Verification* form prior to employment (employees hired after July 1, 2016).

Corrective Action: On or before June 30, 2022, submit to the BSE attestation that MMHCDS will obtain a *State of Connecticut Educational Employer Verification* form for each new employee and upon obtaining completed forms, the program's chief administrator or education director will make appropriate contact with previous or current employers.

Issue 2: In two of five personnel files reviewed, there was no evidence of a request for a DCF background check within thirty days of hire. DCF conducted background checks on November 29, 2021, for the two employees and MMHCDS provided evidence to the BSE.

Corrective Action: On or before, June 30, 2022, submit to the BSE attestation that a DCF background check will be submitted within thirty days of hire and on file within sixty days from the date of employment in accordance with CGS Section 10-221d.

Issue 3: In five of five personnel files reviewed, there was no evidence that the education staff participated in a minimum eighteen hours of annual professional development activities.

Corrective Action: On or before June 30, 2022, submit to the BSE attestation that moving forward the program will include in each staff file:

- the annual summary or transcript that indicates their professional development activities; and
- an administrative professional development and training record identifying the date, topic, duration, presenter, and participant signatures—to document that each education staff member has received a minimum of eighteen hours of professional development and training at no cost.

Standard J: Health and Safety - A private facility shall conduct monthly emergency drills that include one crisis response drill other than a fire drill once every three months.

Issue(s): In reviewing emergency drill records, documented fire drills occurred monthly. However, there was no evidence that every third drill was a crisis drill.

Corrective Action: On or before June 30, 2022, submit to the BSE attestation that the program will maintain emergency drill documentation evidencing that every third drill will be a crisis drill.

Recommendations:

The following recommendations are offered to Manchester Memorial Hospital Clinical Day School:

Maintain documentation of all professional development and training participation in individual personnel files to include the date, topic, and duration of each activity as well as employee attendance signature and certificates of completion if provided. Implement this practice, in addition to the current practice of maintaining an administrative professional development record.

Develop and circulate a survey to education and related service personnel to solicit professional development and training topics of interest specific to their discipline. Align professional development and training topics to teacher and related service personnel evaluation results, particularly those identified as areas of continued growth.

Move forth with the plan to train additional teachers in the Wilson Reading System and to explore additional reading programs.

Develop community-based partnerships outside the hospital to expand upon career exploration and vocational opportunities. Explore these partnerships in addition to affording students vocational opportunities within the MMHCDS setting.

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Consider providing 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 a 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.

Within fifteen 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 Manchester Memorial Hospital Clinical Day School's written agreement and acceptance of the entire report, the BSE will submit a recommendation for program approval through June 30, 2026, to the Commissioner of Education.

Upon such approval, the following will be applicable to Manchester Memorial Hospital Clinical Day School:

- Approved Ages to Serve:** 11 to 22 years old
- Approved Grades to Serve:** grades 6 through 12
- Approved Student Capacity:** 36 students
- Approval Expiration Date:** June 30, 2026

cc: Patricia Sobraske, Education Director