

STATE OF CONNECTICUT DEPARTMENT OF EDUCATION



TO: Toni L. Giannone, Chief Administrator

The Speech Academy

FROM: Dori Papa, Ed. D., Education Consultant

Bureau of Special Education

DATE: January 12, 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 *Policies, Procedures and Standards for Approved Private Special Education Programs,* were conducted remotely and in accordance with the approval process.

On November 23, 2020, an evaluation team conducted a virtual site visit review for re-approval of The Speech Academy special education program. The team consisted of:

- Dori Papa, Ed.D., Education Consultant, Bureau of Special Education (BSE);
- Lavi Ben-Zvi, Coordinator of Outplacements, Norwalk Public Schools; and
- Jennifer Johnson, Education Director, B.E.S.T. Academy.

During a previous virtual site visit on November 20, 2020, 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 November 23, 2020, 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 interviewees reported administration is very supportive, collaborative, and feel that their ideas and input are highly valued by administration. Several informal classroom observations are conducted annually and the timely feedback is greatly appreciated.
- Staff are characterized as dedicated, encouraging, and positive in their interactions with students.
- The program has a strong culture of interdisciplinary collaboration. Teacher and related service
 provider interview respondents described the high level of collaboration and teamwork,
 involving all stakeholders, as a program strength. Related service providers are frequently within
 classrooms for the purpose of supporting teachers through modeling, guiding, as well as, helping
 them to use assistive technology.
- Teachers and related service providers maintain frequent communication with parents/guardians. They appreciate the opportunity to work closely with parents during the provision of remote instruction.
- The observation team reported evidence of well-planned instruction that appeared to be appropriate to the current level of performance for each student and aligned with individualized education program (IEP) goals and objectives.
- Classroom observations evidenced that staff members provide students with consistent and clear expectations, positive praise, and reinforcement.
- Classroom observations confirmed the implementation of highly individualized academic
 instruction and access to necessary accommodations. The teachers observed exhibited flexibility
 during instruction and provided differentiated learning opportunities to maintain student
 engagement. Individual student progress is reviewed by each student's interdisciplinary team
 often and with regularity.
- The program has developed an information technology (IT) team and has invested in technology and equipment that supports teachers in their instruction and students in their learning. Laptop computers and iPads have been provided for teachers, paraeducators, related service providers as well as parents upon request—enabling remote learners to participate with in-person learners. The program has also invested in applications including professional versions of Zoom, Google Business and Classroom, IXL, Boomcards, Glogster, Smart Notebook, Microsoft applications, and other education programs to support learning.
- The high level of staff commitment was noted as a program strength by program administration and the observation team. The IT team has invested extended hours for the purpose of training all staff members to use distance learning software applications as well as supporting parents with the on-boarding process of distance learning.

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, 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 Statues (CGS) and the regulations adopted thereunder; Public Act (PA) No. 96-246 (reporting of child abuse); PA No. 11-232 — An Act Concerning the Strengthening of School Bullying Laws; PA No. 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 No. 16-67, each APSEP is required to obtain the information listed on the State of Connecticut Educational Employment 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 that an employment verification form was completed for four (4) employees hired after July 1, 2016.

Corrective Action: Provide an attestation to the BSE that the State of Connecticut Educational Employer Verification form will be obtained for each new employee and that upon obtaining completed forms, the program's chief administrator or education director 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 in the private facility. 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 the student's placement in the facility prior to enrollment.

Issue(s): 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, or other basis.

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. Submit to the 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 I: Qualifications and Requirements for Instructional, Administrative, and Support Personnel

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 (Section 10-221d of Connecticut General Statutes).

Issue: The review five (5) personnel files indicated that fingerprinting was not done and submitted for criminal background checks within thirty (30) days of hire for the five (5) employees.

Corrective Action: Provide a letter of attestation to the BSE by February 28, 2021, that the program will develop procedures to conduct fingerprinting within thirty (30) days of hire. Submit documentation that fingerprinting was submitted for the next two (2) new hires.

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, fire drills were documented to occur monthly. However, there was no evidence that every third drill was a crisis drill.

Corrective Action: On or before February 28, 2021, submit to the BSE an attestation that the program will maintain emergency drill documentation evidencing that every third drill will be a crisis drill. Provide the BSE with documentation that required fire and emergency drills were conducted between January and February 2021.

3. Recommendations:

The following recommendations are offered to The Speech Academy:

- Maintain and refine the process of reviewing IEPs for appropriateness and accuracy. Ensure that related services provided on an individual and small group are broken out/separated.
- Consider providing increased opportunities for students to interact with each other during classroom instruction.
- Improve communication frequency and responsiveness with the sending LEAs.
- Consider displaying "language rich" materials on the walls in classrooms and hallways such as student work products, charts, and other visuals for students to reference.

• Consider the provision of more targeted professional development activities for paraeducators that are more closely related to their roles and responsibilities.

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 January 31, 2025, will be submitted to the Commissioner of Education.

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

Approved Ages to Serve: 5–22 years old (Grades K–12)

Approved Student Capacity: 65 students

Approval Expiration Date: January 31, 2025

cc: Judith Walsh, Education Director