




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Tammy Moscrip, Ph.D., LCSW, Chief Administrator
The Spire School

FROM: Colleen Hayles, Education Consultant 
Bureau of Special Education

DATE: May 25, 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 March 11, 2021, an evaluation team conducted a virtual site visit review for re-approval of the Oak Hill School (Oak Hill) special education program. The team consisted of:

- Colleen Hayles, Education Consultant, Bureau of Special Education (BSE);
- Meghan Osowiecki, Assistant Director of Pupil Personnel, Stamford Public Schools; and
- Pamela Potemri, Ed.D., Education Director, Connecticut Coastal Academy.

During a previous virtual site visit on March 4, 2021, Ms. Hayles reviewed select education files of students. In addition, Ms. Hayles reviewed the application materials submitted to the BSE by your staff, as well as personnel files.

At the exit conference on March 11, 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:

- The Spire School provides a small and safe educational environment for a unique population of students whose social emotional status, self-regulation difficulties, and impaired coping skills significantly impact their ability to reach their academic potential within a general education environment. In many cases, students have demonstrated school avoidance and/or require a highly individualized specialized program of instruction within a therapeutic setting.
- The program focuses on empowering students to achieve their academic potential through an individualized, strength-based holistic approach, addressing academics, executive function skills, social emotional learning, development of healthy relationships, critical thinking skills, and responsible decision making.
- A high staff to student ratio, allows for individual and small group instruction, specialized support to address a student’s learning differences, creative electives based on student interest, and learning labs to address the individual needs of students.
- The Spire School employs a mix of general education content area teachers and special education teachers to deliver a Grades 6–12 curriculum aligned to the Connecticut Core Curriculum, which is rigorous in nature and tailored to student need. Course offerings range from basic grade level courses to honors level and advanced placement courses and includes opportunities for students to engage in college level courses.
- The Spire School program model provides each student with a life coach—a certified mental health professional who provides for coordination of care, executive functioning coaching, cognitive behavioral therapy, and dialectical behavioral therapy. Life Coaches are viewed as the “hub” within the Spire School community, spearheading collaboration between students, staff, parents/families, school districts, and outside providers.
- Students benefit from weekly 1:1 counseling, as well as therapeutic groups, which focus on self-discovery (Know Thyself); developing executive functioning skills; and a group that emphasizes social communication skills, conflict resolution, reflection, and team building (Process Group). Life coaches are also available throughout a student’s day to support them as needed.
- Students are also assigned a college counselor to assist in future planning and the application process.
- “Learning labs” have replaced “study hall” and focus is shifted to applying newly learned executive function skills through teacher directed activities.
- Flexibility in programming, if needed, affords students 1:1 instruction/coaching as they transition into the program throughout the year and/or back into an educational setting.
- Communication and collaboration between and among stakeholders (students, families, faculty, clinicians, outside providers and school districts) is viewed by the program as a cornerstone of the program and an essential element in improving student outcomes.

- The program views communication and collaboration between and among stakeholders (students, families, faculty, clinicians, outside providers and school districts) as a cornerstone of the program and an essential element in improving student outcomes.
- Service learning opportunities are available to students and for seniors to participate in a Senior Symposium as part of their transition to post-secondary education or employment.
- Staff feedback acknowledged and complimented the education director’s level of support and constructive feedback provided.
- The program moved to a new site August 2020, which has provided an increase in instructional space, including learning lab areas, community spaces, a kitchen, and a well-equipped exercise/work out area.

2. **Standard Deficiencies:**

The following standard deficiencies must be rectified:

Standard H: Positive Behavioral Supports, Prevention, and Intervention Strategies

Each private facility shall have written policies and procedures describing the positive behavioral supports and services, as well as, the prevention and intervention strategies employed by the program. No student management policy, individualized education program (IEP), or associated behavior intervention plan shall identify the use of restraint or seclusion.

Issue: A review of the program’s documentation of the behavior management approaches/systems in the student management policies indicates that “Other Behavior Management Strategies” include the use of restraint and seclusion. Emergency restraint and seclusion procedures cannot be identified as planned strategies or interventions.

Corrective Action: Revise the student management policies by omitting “Other Behavior Management Strategies.” Include the policy related to the emergency use of restraint and seclusion in a policy that articulates “emergency procedures.”

Standard I: Qualifications/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 Department of Children and Families 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 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. C.G.S. Section 10-221d

Issue: A review of staff files indicated that while there was verification of documentation of some required elements of the staff file, the following were absent or not found to be consistent across the files reviewed:

- documentation that fingerprinting was conducted within 30 days of hire;
- consistent documentation of annual educator evaluations (per Connecticut’s System for Educator Evaluation and Development [SEED] plan); and
- documentation of participation in professional development activities.

Corrective Action: Develop and implement a process for maintaining the necessary documentation within the staff file that includes the verification that fingerprinting was conducted within 30 days of hire, provides consistent documentation of annual educator evaluations aligned with Connecticut’s SEED, and includes an annual summary of the professional development activities in which each staff member has participated. 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. Additionally, submit copies of the documentation (indicating date of fingerprinting submission) for the next two hires, as well as, their hire dates to verify that fingerprints were submitted within 30 days of hire.

3. Recommendations:

It is recommended that The Spire School consider taking the following action:

- Consider engaging in discussions at planning and placement team meetings conducted by sending districts around the need to identify special factors within the IEP to address the student’s internalizing behaviors that impedes his/her learning or the learning of others, even though IEPs appear to be generally well developed and reflect the services provided in accordance with student need and the program model. The inclusion of a statement in the Special Factors section under “other,” which indicates that the student’s need for a “therapeutic environment,” as well as goals and objectives are required to provide an appropriate individualized program.
- Consider having teachers and life coaches collaborate to develop a process that clarifies how a student accesses the support of a life coach as needed throughout the day (and then returns to the classroom setting)—in a manner that encourages a student’s resilience and self-regulation while addressing their social emotional needs and maintaining an appropriate level of accountability and membership in the instructional setting. Investigate the efficacy of implementing a push-in versus a pull-out approach, as appropriate, when students seek the support of their life coach.
- Expand the use of curriculum-based measures and data-based progress monitoring tools to assess student progress in academic and social emotional learning.
- Continue the initiative to expand transition assessment, planning, and services to support student independence and success in post-secondary education and employment settings. Develop a mechanism to measure student outcomes upon returning to home school or graduating from the program.

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- Expand opportunities for students to engage in community experiences and gain information related to careers through internships and other experiences in addressing transition and post-school outcome goal statements identified in the IEP.
- Ensure that future contracts with providers of related services entered into by the Greenwich Education Group on behalf of The Spire School, include that services are being contracted to support students enrolled in The Spire School.

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, 2026, will be submitted to the Acting Commissioner of Education.

Upon such approval, the following will be applicable to The Spire School:

Approved Ages to Serve:	11–22 years old (Grades 6–12)
Approved Student Capacity:	62 students
Approval Expiration Date:	June 30, 2026

cc: Barbara Stolarik, Education Director