




STATE OF CONNECTICUT  
DEPARTMENT OF EDUCATION



**TO:** Christopher Lacey, Chief Administrator  
Waterford Country 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 April 6, 2021, an evaluation team conducted a virtual site visit review for re-approval of Waterford Country School special education program. The team consisted of:

- Colleen Hayles, Education Consultant, Bureau of Special Education (BSE);
- Dawn Davis, Director of Pupil Personnel, Portland Public Schools; and
- Jeffrey Drew, Education Director, Whitney Hall School.

During a previous virtual site visit on March 30, 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 April 6, 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:**

- Waterford Country School addresses the individual needs of students Grades K through 12 experiencing social emotional and behavioral challenges by leveraging close relationships between students and staff, involving families, and treating each moment as an opportunity for social growth and success.
- Staff have clearly embraced the Children and Residential Experiences (CARES) model (Cornell University’s model) and highlighted the level of collaboration and cooperation demonstrated by all in support of student success.
- Staff noted that the educator evaluation process has contributed to the supportive, collaborative climate within the building and has informed their practices within the classroom.
- The Levine Education Center provides a facility and an environment that mirrors a typical school. Instructional and support service areas are well designed, well equipped and provide a welcoming atmosphere. Classrooms were well supplied with the materials and the technology necessary to implement the individualized education programs (IEPs) of the students enrolled.
- The program takes pride in the academic rigor provided through the curriculum and instruction, which contributes to a student’s smooth transition back to a public school and the level of instruction provided in that setting.
- Students enrolled at Waterford Country School benefit from a long standing relationship between the program and Cornell University and the CARE model of therapeutic support. Waterford Country School maintains a partnership with Cornell University that has resulted in the development of a strengths-based, relationship-driven and trauma-informed supportive school setting for students. This approach to supporting students continues to positively impact staff relationships and the overall culture and climate of the program.
- The program’s commitment to fidelity in the implementation of the CARE model and therapeutic crisis intervention (TCI) has had a significant impact on reducing the number of critical incidents and the need for crisis intervention, the emergency use of restraint and seclusion, and the use of psychotropic medications for students within the school and residential care programs.
- Related services and supports available to students enrolled include school psychology services, clinical/social worker services, one-to-one mentoring, occupational therapy, speech/language therapy, services of a certified reading specialist and school nursing services.
- The program supports an extensive farm sanctuary on campus that provides a number of pre-vocational, vocational, and on-campus employment opportunities for middle and high school students. Elementary students participate in daily related instructional sessions on the farm that also support each student’s social, emotional, and behavioral growth.

- Classroom observations provided confirmation of the implementation of evidence- and research-based instructional strategies and interventions within classrooms providing programming within multi-age/grade classrooms.
- Students benefit from an experiential education program, providing challenges such as a ropes course and climbing wall. In addition, students benefit from participation in the on campus farm program.
- The Levine Education Center employs five service dogs in support of students' social, emotional growth.
- As students approach transition age they are supported by the development of a student-centered "transition portfolio," which provides each student with his/her IEP, and as appropriate, applications to post-secondary educational institutions or employment, a resume, and a transcript of courses completed.
- The inclusion of a full-time reading specialist has enhanced the rigor of instruction provided at each level. The reading specialist provides support to classroom instruction through a push-in model, as well as, individualized instruction to increase students' growth in all areas of reading.
- Upon enrollment in the special education program, an individual service plan (ISP) is developed for each student, which identifies targeted supports and interventions needed to address a student's needs. This plan later informs the development of a student's IEP related to interventions and accommodations needed to support student success.
- The professional development activities provided and the opportunities available for staff are varied and relevant to the population served. Staff indicated that they have access to additional opportunities to support their individual professional growth outside those provided by the program.
- The program administrators were characterized by staff as being involved, accessible, and always available to assist in addressing individual student needs, as well as supportive in the provision of supervision.
- The administrators have developed and maintained highly collaborative relationships with districts who have placed students to ensure the provision of a free and appropriate public education.

**2. Standard Deficiencies:**

There are no identified standard deficiencies requiring corrective action.

**3. Recommendations:**

It is recommended that your program consider taking the following action:

- Consider a comprehensive review of the program’s written policies related to positive behavioral interventions employed and the emergency use of restraint and seclusion and revise, as needed, to ensure that emergency responses such as restraint and seclusion are not characterized as “behavioral interventions” and are not included as part of an intervention “plan.”
- Consider including each student’s ISP, developed upon admission, in his/her file.
- Consider opportunities to consolidate instructional spaces assigned to the high school program into a centralized facility as the program grows.
- Consider the need to assign an additional administrator to support and oversee the high school program.
- Investigate opportunities to provide additional “clinical supervision” to school clinicians in cooperation with program administrators in support of both staff and students. Consider accessing the clinical supervisors currently available through the residential treatment program to assist in supervision and evaluation.
- Consider creating a “transition coordinator” position to focus on, and enhance, transition opportunities for students both on campus and in the community.
- Review with staff the need to discuss at planning and placement team meetings and recommend documentation in the IEP, those special factors and considerations necessary to address the needs of each student whose behavior or social emotional status has impacted their learning or the learning of others.
- Consider including the end of the year rating for each certified staff member submitted to SDE as part of the educator evaluation system although annual staff performance evaluations are present in the staff file.

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 Commissioner of Education.

Upon such approval, the following will be applicable to Waterford Country School:

**Approved Ages to Serve:** 5–18 years old (Grades K–12)  
**Approved Student Capacity:** 92 students  
**Approval Expiration Date:** June 30, 2026

cc: Sharon Butcher, Education Director