



STATE OF CONNECTICUT  
DEPARTMENT OF EDUCATION



**TO:** Ms. Jennifer Jencks, Chief Administrator  
Whitney Hall School

**FROM:** Dr. Dori Papa, Education Consultant <sup>DP</sup>  
Bureau of Special Education

**DATE:** June 15, 2022

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

On March 24, 2022, an evaluation team (the team) visited the Whitney Hall School (Whitney Hall) 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. Tina Parchin, Education Director, Eagle House Education Program.

During a previous site visit on March 23, 2022, 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 March 24, 2022, 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:**

The program provides a safe and supportive learning environment with the goal to integrate education and therapeutic interventions, to assist in the emotional and social growth necessary for transitioning students back to their home school district.

Interviewees reported that they feel very supported by administration, are provided with autonomy to think creatively, and appreciate that “they have a voice and feel their input is valued.” Administration is highly interactive with staff and students.

During interviews, teachers and related service providers described the program’s culture and climate as caring, accommodating, and welcoming with a very “family like” feel. An excellent rapport was evident between staff, and staff and students.

The program recently expanded its education staff to include a full-time special education supervisor to ensure continuous program oversight, enhanced staff supervision, and evaluation with a focus on continuous improvement for the educational program. The education director shared that hiring this additional administrator has increased the quality of planning and placement team (PPT) meetings, student learning outcomes, data collection, professional development, and teacher evaluation and supervision.

School social workers have a small caseload of no more than six students and provide students with support as identified in their individualized education programs (IEPs). School social workers are available to provide additional support if needed. Administration reported that small caseloads have resulted in strong relationships between parents and social workers.

The program has a horticulture program with a greenhouse in operation 365 days per year. The grounds have gated gardens, which produce a variety of plants and vegetables with a farm-to-table (horticulture-to-culinary) vocational program.

The program has a well-developed, school-wide positive behavioral interventions and supports (PBIS) system, which incorporates a “self-control, transition, respect, improve, value, and effort” token economy system. The token system offers students positive reinforcement. PBIS implementation principles are evident through visual rules and routines posted throughout the school. Staff reported the program has positively impacted students’ behavior and the overall climate of the school.

A program strength is communication and collaboration. School social workers, teachers, and behavioral staff collaborate and communicate frequently and intensively to consistently implement plans across settings. The interdisciplinary team (including the student when appropriate) works collaboratively to develop proposed IEP goals and objectives and to monitor student progress.

Classroom observations evidenced teachers had identified goals and objectives clearly stated and posted during the course of the lesson. The program has lesson content aligned with the Connecticut Core Standards. Students were engaged in the lessons and demonstrated a willingness to take risks.

The program has invested in technology to support teachers in their instruction and students in their learning. Smartboards are in most classrooms, students have individual Chromebooks, and

paraeducators (teacher assistants) were observed using tablets to collect progress monitoring data.

**Standard Deficiencies:**

Whitney Hall 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 time the student leaves the facility. In accordance with the *Application for Approval of a Private Special Education Program*, Section R, Student Files, page three, a student's individual record shall contain, but not be limited to:

- a copy of the IEP proposed by the local education agency (LEA) prior to referral and at least annually thereafter, indicating current levels of performance and accommodations, and modifications;
- specialized instruction, support, and services (and, as appropriate, a behavior intervention plan and a language and communication plan) developed by the PPT as required to provide a free appropriate public education; and
- cumulative health records.

**Issue 1:** In one of five student education files reviewed, there was no pre-admission PPT IEP in the education record evidencing that a Whitney Hall representative attended the placement PPT.

**Issue 2:** In one of five student files reviewed, there was no evidence of current health records for one student.

**Corrective Action:** Develop an index or organizational format to consistently, use for student's education records. Said format is to ensure that all required components are contained in each file, including those identified in Standard E, Individual Student Records, on page seven of the *Principles, Procedures, and Standards for the Approval of Private Special Education Programs*. Revise the existing protocol/procedure for obtaining student educational records to ensure timely receipt (prior to enrollment) of all required records, including cumulative and current health records.

**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. 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 student's current performance levels, the appropriate specialized instruction, and required related services. Each private facility should participate in the PPT meeting, which discusses and determines placement in the facility prior to student enrollment. Each private facility shall request an IEP from the placing LEA prior to student enrollment and at least annually thereafter. 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.

In accordance with the *Application for Approval of a Private Special Education Program*, Section R, Student Files, (page 33, 99b), the education file maintained by the special education program specifically for each enrolled student, shall contain, but not limited to:

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

**Issue 1:** In four of five IEPs reviewed, the related services on page eleven were not appropriately, reflected—counseling, occupational therapy, and speech and language therapy services were not clearly identified as provided individually or within a small group.

**Issue 2:** In one of five IEPs reviewed, Whitney Hall staff was not accurately or appropriately, identified on page one according to their roles and/or as Whitney Hall representatives attending the PPT meeting.

**Issue 3:** In one of five IEPs reviewed, there was no evidence that Whitney Hall forwarded the IEP progress report to the parent/guardian.

**Issue 4:** In five of five IEPs reviewed, there was no evidence that Whitney Hall forwarded the IEP progress report to the placing LEA.

**Corrective Action:** On or before June 30, 2022, implement a procedure to utilize prior to finalization of an IEP after participating in a PPT meeting. Said procedure shall ensure that all information in the IEP is complete and accurate; allows the ability to document a process, ensuring the IEP accurately reflects PPT consensus; and Whitney Hall 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 written notification to the district, to request necessary changes.

Develop and submit to the BSE a checklist that will be maintained in each student's educational file, to ensure all required components are maintained in the file (*Application for Approval of a Private Special Education Program*, Section R, Student Files, (page 33, 99b).

**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 Child Abuse and Neglect Registry record 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 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. For staff who will work directly with students, state and national criminal history record checks (fingerprinting) shall be submitted within thirty days of hire and on file within sixty days from the date of employment. Connecticut General Statutes Section 10-221d.

**Issue 1:** In one 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 Whitney Hall 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.

**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:** 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 BSE offers the following recommendations to Whitney Hall School:

Consider expanding Whitney Hall staff to include a full-time school psychologist. An interviewee reported that students no longer have access to a school psychologist due to a psychologist termination in the residential program.

Move forth with the plan to hire additional certified lifeguards for the summer swimming program.

Move forth with the plan to hire a school nurse and to identify a space within the school for a health office.

Continue with the plan to hire a full-time board-certified behavioral analyst (BCBA). During interviews, teachers, related service providers, and administration reported the need for a full-time BCBA. Currently, BCBA services are contracted out and only available one hour per week.

Continue exploring strategies for addressing staff retention issues. An interviewee reported "the need to revamp teacher salaries to be more competitive."

Move forth with re-engaging students in community-based activities and expand upon existing community partnerships, to increase students' vocational exploration opportunities, as shared by the education director. Staff expressed the need to expand vocational experiences for students out in the community.

Continue with the plan for additional Whitney Hall staff to obtain required driver endorsements for transporting students. Transporting students to/from school requires that drivers hold a "V" endorsement and transporting them to/from activities during the school day requires an "A" endorsement.

Include the program's PBIS plan and suspension policy in the program's parent handbook.

Develop a professional development and evaluation committee to assist in reviewing and implementing the educator evaluation plan in place with fidelity and, to provide input into the ongoing professional development plan. Consider developing and circulating a survey to education and related service personnel, to solicit professional development and training topics of interest specific to their discipline.

Develop and maintain an administrative professional development and training plan in each employee personnel file as well as a participation, tracking list. In addition, include the activity topic/title, duration, and attendee signature, to evidence education staff receives a minimum eighteen hours of professional development and training annually at no cost in accordance with the principles, procedures, and standards for Connecticut APSEPs.

Contact the Connecticut State Department of Education (CSDE) Talent Office to arrange for the program's chief administrator (responsible for conducting the annual performance evaluation of the education director) to attend the CSDE [System for Educator Evaluation and Development](#) training.

Refine the program's existing protocol for obtaining student's educational records from LEAs and other agencies to ensure timely receipt (prior to student's enrollment).

Arrange for program teachers to participate in the [Teacher Education And Mentor \(TEAM\)](#) training as needed. Contact the CSDE Talent Office to verify that the program is set-up on the CSDE [TEAM Program Dashboard](#).

Provide opportunities for paraeducators to participate in educational trainings with teachers and related service personnel. In accordance with Every Student Succeeds Act 2015, parents/guardians may request that their child's paraeducator attend PPT meetings.

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 independence and self-advocacy will assist in preparing students for this transition.

Preliminary Evaluation Report: Whitney Hall School  
Approval Review for a Private Special Education Program  
June 15, 2022

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 the Whitney Hall School's written agreement and acceptance of the entire report, the BSE will submit a recommendation for program approval through June 30, 2027, to the Commissioner of Education.

Upon such approval, the following will be applicable to the Whitney Hall School:

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

**Approved Grades to Serve:** grades K through 12

**Approved Capacity:** 105 students

**Approval Expiration Date:** June 30, 2027

cc: Jeffrey Drew, Education Director