




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Brooke Violante Kelly
Chief Administrator
High Road School of Hartford Primary

FROM: Colleen Hayles, Education Consultant/Coordinator 
Bureau of Special Education
Approved Private Special Education Programs

DATE: March 15, 2019

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

On February 20, 2019, an evaluation team visited High Road School of Hartford Primary (HRS Hartford Primary) in order to conduct an on-site review for continuous approval as a Connecticut State Department of Education approved private special education program. The team consisted of:

- Colleen Hayles, Education Consultant/Coordinator, Bureau of Special Education (BSE);
- Gwen Killheffer, Director of Education, Solterra Academy; and
- Mark Spalding, Director of Special Education, New Britain Public Schools.

During a previous on-site visit on February 7, 2019, Colleen Hayles reviewed the education files of students as well as personnel files. In addition, Ms. Hayles reviewed the application materials submitted to the BSE by HRS Hartford Primary administration.

At the exit conference on February 26, 2019, 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.

Commendations:

- The program provides a highly structured, differentiated, and individualized program, which addresses the academic and behavioral needs of students through personalized instruction and small-group interactive learning.

- The program employs a rotation system in delivering instruction, which allows for differentiation and individualization as well as adaptive computerized learning to reinforce academic skills.
- Generally, students appeared engaged and attentive during individual instruction, reinforcement, and independent academic activities. A connection between instruction and the goals and objectives in the individualized education program (IEP) provided was demonstrated in each classroom.
- Staff is characterized as dedicated, encouraging, and positive in their interactions with students.
- A positive and neutral tone and tenor was observed in all settings. Staff share an appreciation for the need for collaboration and teamwork. The team noted a culture of respect and encouragement among staff and students.
- Professional staff view the educator evaluation process as a valuable tool in acquiring critical feedback, which results in improved skills and positively impacts student performance. Staff commended the chief administrator's approach to evaluating teacher performance and student outcomes.
- Staff described student learning outcomes as being relevant and connected to the overall program goals as well as student learning.
- Academic and behavior instruction and interventions are data driven. The program employs a strong data collection process through a Catapult data collection and analysis system. Individual student data as well as trend data are reviewed often and with regularity.
- An assessment, curriculum, and instruction model is supported by the availability of a variety of materials, methodologies, and programs, which informs tiers of intervention based on grade level standards.
- An "IEP Binder" is maintained in each classroom for each student. Data on progress towards the attainment of goals and objectives is documented throughout the week.
- Spaces within the facility are student friendly and highly motivating for young students. The facility maintains a structured play therapy lab, a motor lab, a mindfulness center, and a pet center.
- Staff appear to function as a supportive community as even part-time service providers indicate a unique level of inclusiveness.
- The program employs a Quality/Risk and Safety Committee to review critical cases and determine the next steps taken to address a student's needs.
- The schoolwide level system is designed to equip students with learning strategies to manage their impulses, accept an appropriate level of responsibility for their actions, and self-monitor their behavior. The consistent language used by staff in delivering verbal prompts and

expectations to students, promotes a predictable environment. In addition, the structure of the level system allows all staff (veteran, new, support and related service) to be unified when addressing student behavior.

Standard Deficiencies:

The following standard deficiencies must be rectified:

Standard D: 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 Statutes (CGS) and the regulations adopted thereunder; Public Act (PA) 96-246 (reporting of child abuse); PA 11-232 – An Act Concerning the Strengthening of School Bullying Laws; PA 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: There is no evidence that the program utilizes the State of Connecticut Educational Employer Verification form in accordance with PA 16-67.

As required by CGS Section 10-222c, as amended by PA 16-67, each APSEP is required to obtain the information listed on the Connecticut employer verification form from all current or former employer(s) of the applicant 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.

Corrective Action: Provide an attestation 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 director of education 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 from the placing LEA, an IEP, 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 also 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 planning and placement team (PPT) meeting, which discusses and determines placement in the facility prior to enrollment.

Issue: In the IEPs reviewed, one or more required elements was not accurately reflected or the IEP document was not complete, therefore prohibiting the program from fully implementing the IEP. Errors and omissions included the following:

- In one of five IEPs reviewed, it was indicated that the student was hard of hearing. Documentation of the implementation of the required Language and Communication Plan was absent from the IEP and the student file.
- In four of five 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 basis, or other means.

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 IEPs developed by the LEA's PPT for students enrolled. Demonstrate careful review for accuracy and completeness, and if needed, illustrate the implementation of written notification to the district to request necessary changes.

Recommendations:

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

- Notify the LEA when and if a student in crisis is referred to the internal Quality/Risk and Safety Committee to determine next steps to be taken to address a student's needs.
- Expand technology resources and the tools and skills necessary for staff to enhance instruction with the use of technology.
- Ensure that all staff including those providing related behavior supports and consultation have a familiarity with the development and implementation of each student's IEP.
- Continue to create and implement additional flexibilities in the current schoolwide level system to support the use of de-escalation strategies within the classroom setting. Not all students are responsive classroom removals, which could trigger increased student aggression and result in the need to respond to an emergency situation.

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. Please be advised that a recommendation for continuous approval through June 30, 2024, will be submitted to the Commissioner of Education once written acceptance of the report in its entirety is received.

Upon such approval, the following will be applicable to HRS Hartford Primary:

Approved Ages:	5–13 years old
Approved Capacity:	44 students
Approval Expiration Date:	June 30, 2024

cc: Jennifer Johnson, Director of Education