




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Stephen Bell
Chief Administrator
The Foundation School - Orange

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 January 17, 2019, an evaluation team visited The Foundation School - Orange (Foundation - Orange) 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);
- Mary Acquarulo, Director of Education, Chapel Haven; and
- Linda Carabis, Director of Special Education, Regional School District 10.

During a previous on-site visit on January 10, 2019, Colleen Hayles of the BSE reviewed the education files of five students. In addition, Ms. Hayles reviewed the application materials submitted to the BSE by Foundation - Orange administration.

At the exit conference on January 17, 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:

- Students are provided with a language-based approach to learning and the supports necessary to develop communication, academic, social, and physical competencies. Programing focuses on the development of speech and language skills, perceptual/motor skills, social skills, behavioral support, pre-academic and academic skills, and community involvement for experiential and social learning.

- Integrated instruction enables students to learn language through auditory, visual and hands-on activities, and learn to apply their new knowledge and skills in the widest possible range of activities and environments.
- The program provides a high staff to student ratio, which supports each student's need for individualization and differentiation of instruction that emphasizes the development of language skills and social proficiency. The students observed were characterized as attentive and engaged in their learning.
- Program staff implement a team approach regarding their contributions to the planning and placement team (PPT) when developing each student's individualized education program (IEP). The IEPs reviewed illustrated well-developed present levels of performance and goals and objectives, which were highly individualized and appropriately tied to the area of concern for each student. There is evidence of a high degree of collaboration between educators, support staff, and related service staff. There was clear evidence of IEP implementation noted in each lesson observed.
- There is a strong focus on parent engagement on a variety of levels. Foundation - Orange utilizes "Kid Reports" as a mechanism for daily feedback to parents and provides "weekend report forms" for parents to complete to foster conversation and student social language skills upon their return to school on Monday mornings. The program also sponsors "rec night" for students and families. The administration is currently working on an initiative to provide professional development for parents, which would cover topics such as social communication, emotional regulation, and health and wellness.
- The program provides opportunities for students to engage with the community on a daily basis depending on their ability and readiness to do so. Explicit instruction is provided to students to support them and foster successful community experiences.
- Throughout each instructional environment, the implementation of both high-tech and low-tech accommodations appropriate to individual students was noted.
- Communication among the staff is highly supported by the program leadership. Staff meetings are held daily. Staff indicated that they value the diversity of staff in approaching and addressing the needs of the "whole child."
- The longevity of the program's professional staff is noteworthy. Staff opinion is valued and the collaboration among disciplines required to address the program's mission creates a supportive, nurturing, and positive culture of lifelong learners.
- While the daily schedule for each student is characterized by 30-minute instructional periods provided by staff from various disciplines, it is clearly evident that every moment of the student's school day is intentional and viewed as a "teachable moment."

Standard Deficiencies:

The following standard deficiencies must be rectified:

Standard I: Qualifications and Requirements for Instructional, Administrative and Support Personnel -

The private facility shall require that prior work references be on record for all applicants and require that the applicant submit to a Department of Children and Families (DCF) 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 APSEP, 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. 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 (Section 10-221d of Connecticut General Statutes).

Issue: A review of staff files did not indicate that the appropriate background checks through the DCF Abuse and Neglect Registry or the national criminal history records check were completed within 30 days of hire and/or maintained in the staff files.

Corrective Action Required: Submit verification to the BSE that within 30 days of employment for the next two staff hired, the DCF registry and the national criminal database background checks and the employment verification were appropriately completed. Submit on or before June 30, 2019, an attestation that the conduct of all appropriate background checks and employment verification processes have become a part of the Foundation - Orange hiring practice.

Standard F: Program Requirements – A private facility shall have a written description of the IEP for each student moving him/her toward college or career readiness and include opportunities to work and interact in the community. The IEP/description shall also have a written curriculum and sufficient instructional materials, supplies, and equipment in accordance with state requirements for educational programs for full implementation of the IEP.

Issue: In four of five IEPs reviewed, one or more required elements of the IEP was not accurately reflected or the IEP document was not complete. Errors and omissions included the following:

- In three of the five IEPs reviewed, the implementation of a behavior intervention plan (BIP) that requires the conduct of a functional behavioral assessment (FBA) was indicated in the Special Considerations section as the means to address behavioral concerns. However, a formal BIP informed by an FBA was not attached as part of the IEP.
- In one of six IEPs reviewed, dissemination of the *Transition Bill Of Rights* to parents of a ninth grader was either not provided at the annual review or the provision of it was not properly documented.

Corrective Actions Required: Develop a consistent and timely procedure to utilize upon receipt of an IEP after participating in a PPT. Ensure that the information is complete, accurate, and the program can implement the supports and services outlined in the document as written. Submit to the BSE copies of the next three IEPs developed by a local education agency (LEA) to provide documentation that the program has consistently implemented an internal IEP audit process of conducting careful review of the district prepared IEP. If needed and as appropriate, provide evidence that the program has notified the LEA that the IEP requires revision in order for the program to fully implement the IEP.

Recommendations:

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

- Consider the addition of a school nurse position on a limited or part-time basis to provide consultation and the oversight of student health conditions; collaborate with staff; act as a resource for parents in relation to health, nutrition, and hygiene issues; and contribute to the program’s “whole child” approach.
- Consider identifying a weekly period of physical education (PE) instruction within the schedule for each student to clearly demonstrate that the program meets the mandated requirement to provide PE instruction.
- Expand on the “intentional instruction” within the daily routine by providing access to organized storage of outdoor play equipment.
- Provide staff with access and opportunities to explore current practices and research related to their field. Provide access to the LRP Publications *Special Ed Connection* resources available on line.
- Consider a revision of job descriptions to include minimum and preferred qualifications for each position.
- Consider expanding personnel to include staff that are able to provide counseling services and standard evaluations although the social emotional needs of students are addressed through the team approach for the provision of services. Possibilities may include a school psychologist, social worker, or guidance counselor based on the needs of the current population.

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 Foundation - Orange:

- Approved Ages:** 3–18 years old
- Approved Capacity:** 40 students
- Approval Expiration Date:** June 30, 2024

cc: Mike Nicholson, Director of Education