

Initial Approval Request

Independent School Review Report- Connected Circles, LLC

General Education & Special Education

Site Review Conducted - October 31, 2022

Submitted by Independent School Review Team Member:

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Special Education Team Liaison:

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Site Review Scope of Work and Purpose

Connected Circles is a limited liability corporation that currently provides contracted educational support services. The owner of the business submitted an application to become an approved general and special education independent school. The AOE's Independent School Team confirms that the application and required supporting documentation met all State Board of Education requirements under Rule 2227.

General Education

Members of the Agency's review team met with Connected Circles staff on Monday, October 31, 2022. Interviews were conducted at the business' location in Berlin. Personnel present for interviews included the owner, three content area instructors, two para-educators (connectors), a business administrative assistant and the Positive Behavioral Intervention and Supports (PBIS) specialist.

School Philosophy & Educational Objectives

Connected Circles' owner and head of school explained that once approved, the school will focus on providing trauma informed intervention supports for publicly placed special education students to help close academic achievement gaps.

State Board of Education Rule 2225.2, 2225.5

School Philosophy

According to Connected Circles' initial approval application:

"The purpose of Connected Circles is to provide a safe, positive learning environment for students in need of an educational placement across Washington County and beyond. When a student is not able to access the public education environment, IEP teams look for programs that are highly individualized, positive, and supportive to the student's social, emotional, and learning needs. This program is designed to do just that."

Program Objectives

A description of Connected Circles' program objectives is included in the initial application. Objectives are primarily focused on offering an academic and social emotional intervention program that will close achievement gaps with the central goal of supporting successful student transitions back to public school.

"...To provide proficiency-based learning instruction that furthers the student's academic career...instruction is specialized for individual students based on their Individual Education Plan (IEP) to include alternative activities, learning opportunities, and strategies. To prepare students for their eventual return to the next less restrictive environment which may include sending school, employment, secondary-educational level, etc. meet... students where they are at academically; differentiate instruction for all students as needed; and work to increase skills,

confidence, and strategies to move forward with success.” (Source: Connected Circles Initial Approval Application, September, 2022)

School Enrollment

16 V.S.A. §166(b)(4), State Board of Education Rule 2225.3

The owner of Connected Circles is seeking approval to open a general and special education independent school with a maximum student capacity of twelve. Student enrollment processes will begin when an LEA submits a referral form requesting student placement. Connected Circles’ owner and the program’s behavioral specialist will review referrals and meet with requesting LEA to determine if Connected Circles is an appropriate placement for potential students.

The second step in the enrollment process is for potential students and either an LEA or family representative to schedule a visit at Connected Circles for the student to view the facilities and meet staff. Finally, the head of school and Connected Circles’ staff will meet to review the LEA’s referral documentation and discuss results of the student’s visit. The head of school will make final enrollment decisions and will contact referring LEA.

It is important to note that Connected Circles’ owner contracted in FY23, with several LEAs, to serve students in the business. Enrolling LEAs are from both Chittenden and Washington counties, and enrollments were completed contrary to Secretary French’s memo of August 23, 2022. The memo was to serve as a reminder of waiver requirements and to correct past non-compliant enrollment practices. The Agency’s director of student support services division is working with involved LEAs and Connected Circles to bring student enrollments into compliance with statutory and State Board Rule requirements ([State Board of Education Rule Related to Special Education Placement Waivers and Contracted Services](#)).

Governance

State Board of Education Rule 2225.4

Connected Circles’ Governance Board will be comprised of five volunteer members with professional expertise providing oversight on fiscal and programmatic management to ensure the success of the school. Once fully staffed, the Governance Board will work directly with the head of school on a regular basis to ensure compliance with statutory and State Board of Education Rule compliance.

Minimum Course of Study & Required Assessments

16 V.S.A. §166(b), State Board of Education Rule 2225.5

Connected Circles’ curriculum development and instruction goals are based upon Common Core State Standards, Proficiency Based Graduation Requirements and Personalized Learning Plans (PLPs). General education curriculum goals include integration of behavioral interventions rooted in trauma informed best practice.

Delivery of Minimum Course of Study

Connected Circles, once approved, will offer a one-on-one instructional model. When appropriate students may be grouped in small, two to three, student classes to foster peer tutoring and facilitate student-centered academic confidence. Students will be directly involved in the development of their personalized learning plan (PLP).

During the site visit, the Agency's review team interviewed instructional staff to confirm whether the staff were prepared to implement the school's stated program objectives. The review team found that staff members could not identify or articulate either the school's stated philosophy or program objectives. In these interviews, instructional staff had some difficulty describing methods of instruction the future school will employ to develop and implement curriculum.

Additionally, the interviews demonstrated that instructional staff could not describe or explain methods for developing Proficiency Based Learning opportunities or how to differentiate instruction based upon each student's Individualized Education Plan (IEP). Interviewed staff could not describe how they will determine appropriate assessment methods to meet the needs of students by age, grade and ability level as defined by 16 V.S.A §906 and Rule 2226.5.

However, interviews with treatment support staff and the PBIS specialist clearly identified methods of support these staff members will use to enable students to access academic programming. Support staff provided examples of trauma informed best practice methods they will use to foster student engagement. Support staff also communicated effective techniques for minimizing student academic stress that will reinforce reintegration of students in placing LEA.

Connected Circles' PBIS specialist demonstrated a thorough understanding of best practices for facilitating student behavior management across all school settings. Additionally, the PBIS specialist clearly defined a process of future student personalized PBIS goal setting and engagement as well as how each method will be accommodated to meet the needs of students based upon their IEP goals and service delivery plans.

Professional Staff

State Board of Education Rule 2225.8

The Agency of Education's review team confirmed that Connected Circles' special educator holds a current Vermont license and will be involved in providing special education services directly to students. The special educator is also the owner of the business and will provide direct supervision of all content area instructors and support staff to ensure curriculum is properly accommodated.

All instructional staff who are assigned to academic areas have met minimum requirements to teach in their respective classes. Instructors and support staff will engage weekly in a variety of staff meetings with mandatory attendance. Student progress and treatment programming will be reviewed for efficacy during both whole-staff meetings and during individualized supervision meetings between the owner and content instructors or individual support staff also referred to at Connected Circles as a "connector."

All staff members will be trained annually on a variety of treatment, academic and social/emotional programming, including strength-based approaches toward discipline of children and youth who have varying degrees of adverse childhood experiences, and complex trauma. A plan is in place for staff to engage in professional development for both content and methods of instruction.

The owner of Connected Circles engaged contracted services of a curriculum development specialist to assist future content area instructors and support staff on setting goals, engage in curriculum best practices development and corresponding assessment methods. The director of Connected Circles reported that the staff has been working with the consultant since July 1, 2022.

Currently, Connected Circles does not have a social studies/history instructor on staff and does not have any current staff members with background qualifications to provide social studies content area instruction. Therefore, at this time, Connected Circles does not meet the State Board of Education's requirements for both Minimum Course of Study under 16 V.S.A §906 and State Board Rules 2226.8 and 2226.8.1.

Staffing Safeguards:

Background checks were conducted for all staff at Connected Circles prior to start date. Fingerprint supported criminal record checks and VT adult/child registries checks have been completed. Documentation confirming staffing safeguards are stored in confidential filing system, and available for review upon request.

Mandatory Reporting Procedures:

Connected Circles has implemented and published its mandatory reporting procedures and expectations in the staff handbook. Future family/student handbooks will include a copy of mandatory reporting information. Included in Connected Circles' policy are provisions for reporting child abuse and the circumstances in which a case must be reported to school administrators and appropriate authorities. Staff will participate in required annual refreshers regarding best practices on policy development, implementation, and compliance during in-service prior to the start of each school year.

Health & Safety

Emergency Services:

Connected Circles' owner reviewed with Agency review team member, policies for addressing monthly fire and emergency safety evacuation protocols. Connected Circles' staff are currently working on developing lock-down and shelter in place strategies based upon trauma informed practices.

Connected Circles' head of school and a staff member with a medical background are trained in CPR and First Aid. The staff member with professional medical background will provide First Aid and CPR training for all staff members as well as annual refreshers during August's in-service.

Nursing Services, Medications, and Immunization Records:

Connected Circles does not have a nurse on staff and will rely upon 911 Emergency Service responders, as needed. Designated staff members will be trained in proper dispensing of student medications, on how to log medication schedules and to ensure medicines are locked securely in a designated cabinet. Student Immunization records will be included in each student file and stored in a secure, filing system.

Hazing, Harassment & Bullying Policies

Connected Circles has adopted the Agency of Education's policies for, hazing, harassment, and bullying (HHB) and the policy is included in the family handbook that will be provided during initial enrollment. Connected Circles' entire staff will be required to attend annual in-service training to review HHB best practices prior to the first day of school.

Facilities

State Board of Education Rule 2225.6

Connected Circles' facility is organized, well maintained, and welcoming. The school building is clean, in good repair and located on five open acres of land containing well-groomed walking or running trails.

The ample green space surrounding the school building is intended for student participation in physical education, outdoor education and other academic or therapeutic opportunities.

Connected Circles' facility has a hard-wired fire alarm and sprinkler system which has been inspected. Connected Circles' heating and ventilation systems have also been inspected. A current certificate of occupancy was submitted with the school's initial approval application and is on file at the Agency.

At the time of review, Connected Circles' facility did not meet Vermont's Public Accommodations Act requirements, in particular for the school's bathroom facilities. At the time of the site review, it was unclear if the school's main entrance and entrances for each class space, common spaces and lunch room areas are accessible. During the exit interview with Connected Circles' owner, Agency review team members provided technical assistance regarding expectations of the State Board of Education in meeting accessibility requirements.

Financial Capacity

The owner/head of school provided a draft budget for the 2022-2023 school year showing anticipated revenue and expenses. A letter from a local lending institution was also provided confirming a \$50,000 line of credit to the owner/head of school.

Special Education Report

Connected Circles is seeking approval for the following disability categories: Autism Spectrum Disorder, Emotional Disturbance, Intellectual Disability, Multiple Disabilities, Other Health

Impairment, Specific Learning Disability, Speech or Language Impairment, and Traumatic Brain Injury. They appear equipped to meet the needs of such students, with the caveat that students presenting with extreme needs may need special consideration. Connected Circles was visited by representatives from the AOE on October 31, 2022. During the visit, Agency representatives toured the facility and interviewed school staff members.

A theme throughout the school's written materials and in interviews with staff was "connectedness." Staff members, depending on their role within the program, see their role as that of making and maintaining connections – with students, families, community services, and sending LEAs. They also see their role as helping the students to make connections between the curriculum they're studying and the world around them as well as to understand how their social/emotional/behavioral skills impact their academic skills (in both positive and negative ways).

2228.1 (1) – The staff and programs at Connected Circles meet state and federal special education standards. The facility needs modification to make it fully accessible.

2228.1 (2) - Connected Circles has applied for and, aside from the facility modifications and its approval for general education, is equipped to provide special education services for the following disability categories: Autism Spectrum Disorder, Emotional Disturbance, Intellectual Disability, Multiple Disabilities, Other Health Impairment, Specific Learning Disability, Speech or Language Impairment, and Traumatic Brain Injury

2228.3.1 – Connected Circles has a comprehensive and well-organized set of written procedures modeled after and supplementing what the Vermont Agency of Education's Special Education team has recently made available to public schools. They have well thought-out procedures for and show evidence of their readiness to maintain and implement written procedures for

- admissions,
- least restrictive environment,
- discipline,
- graduation,
- faculty-to-student ratios,
- coordination with sending schools, responsible agencies and parents regarding educational records, evaluations, IEPs, transition plans, behavior intervention plans, progress reporting, data collection regarding provision of services, changes in placement, and medication prescriptions as applicable.

2228.3.2 – The School Director holds a valid Vermont special education license, and she provides both direct services to students as well as oversight, modeling, and supervision of other services provided by non-licensed staff members.

Recommendation – see revised recommendation below AFTER the Addenda

The Agency's review team does not recommend initial approval to the Secretary of Education, at this time, for Connected Circles due to identified deficiencies in the school's program.

Program deficiencies have been confirmed in the following areas: Minimum Course of Study 2225.5, Title 16 §906, professional staff requirements 2226.8.1, Connected Circles' staff inability to articulate appropriate methods of instruction and evaluation on how to meet the needs of students by age, grade and ability level as defined by 16 V.S.A §906 Rule 2226.5, and pending submission of Certificate of Occupancy to confirm completion of renovations to the first floor of the facility 2226.6(3).

Point-in-Time Site Review Addendum

Introduction:

Connected Circles' initial approval site review was conducted on 10-31-22. Prior to the issuance of the Secretary's initial report and recommendation regarding approval, Connected Circles' owner requested technical assistance from the AOE to address one of the findings cited in the official review report.

This addendum will serve to update both the Independent School Sub-Committee and entire State Board of Education on the scope of work completed at Connected Circles since the site review was completed.

Independent School Post-Review Program Updates

Identified Program Deficiency:

Facilities State Board of Education Rule 2225.6

At the time of review, Connected Circles' facility did not meet accessibility requirements, in particular, the school's bathroom facilities. During the initial site visit it was also unclear if the school's main entrance and entrances for each class space, common spaces and lunch room areas were accessible. During the exit interview with Connected Circles' owner, Agency review team members provided technical assistance regarding expectations of the State Board of Education in meeting accessibility requirements.

Post-Site Review Interventions

The owner of Connected Circles submitted, on January 30, 2023, to the Agency's Independent School Team a copy of an updated Certificate of Occupancy and supporting documents to confirm completion of renovations to the business facilities and demonstrated compliance with physical accessibility requirements regarding main entrance, bathroom facilities, access/egress of the first-floor classrooms, lunch room and common spaces.

Agency of Education Response & Update

As a result, the Agency of Education’s Independent School Team can confirm that the owner of Connected Circles has met State Board of Education facilities requirements under SBE Rule 2225.6.

Point-in-Time Site Review Addendum

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Independent School Post-Review Program Updates

Identified Program Deficiencies:

Minimum Course of Study 2225.5, Title 16 §906 & Professional staff requirements 2226.8.1

At the time of review, Connected Circles’ did not have a qualified social studies teacher and therefore could not meet the Minimum Course of Study requirements for this core subject area.

Post-Site Review Interventions

The owner of Connected Circles submitted, on February 15, 2023, to the Agency’s Independent School Team information about the qualified social studies teacher that was hired. This teacher is scheduled to start on March 9, 2023.

Agency of Education Response & Update

As a result, the Agency of Education’s Independent School Team can confirm that the owner of Connected Circles has met State Board of Education Minimum Course of Study and professional staff requirements under SBE Rule 2225.5. and 2226.8.1.

Final Recommendation – 2/27/2023

The Agency's review team recommends initial independent school approval to the Secretary of Education at this time for Connected Circles due to identified deficiencies in the programming being remediated.