

From: [Tim Feeney](#)
To: [Pallas Gray, Pat](#)
Subject: Mill School Responses
Date: Friday, January 13, 2023 3:44:57 PM
Attachments: [Mill School Responses to AOE Licensure Findings.docx](#)

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Dear Pat,

Attached you will find our written responses to the AOE report for our license renewal. I hope that I you find that our responses are reasonable and clear.

Please let me know your thoughts.

Thank you,

Tim

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Dear Pat,

Thank you for the conversation and for clarifying the review team's findings. We are pleased that the team recognized we meet the requirements for licensure renewal, and we agree with most of the findings contained in the report; however, there are some elements in the final report that make us unable to acknowledge the findings as completely accurate. The specific issues that we find problematic are related to our management of school attendance and resulted in the Agency of Education (AOE) review team recommending our license be renewed for only two years. We are providing the following responses to the AOE team findings to correct the inaccuracies we found in that report:

Response to Concerns About Our Attendance Systems

All our attendance data is collected by our Administrative Assistant in real-time. This data includes student arrival and departure times. This information is recorded in electronic form in a password protected file each day by our Administrative Assistant, or their designee, as well. We know when each student arrives and departs and the reasons that they depart. The data is reviewed by the School Director and/or the Chief Knowledge Officer each month, with student specific and school wide trends identified for further evaluation. We interact with Local Education Authority (LEA) representatives about attendance in quarterly reviews, and more frequently when there is a negative trend. Finally, we review this data as part of our quality assurance process.

Response to AOE Staff Finding Six Students in Attendance on May 31st

We are not sure why the AOE staff documented that they were only able to observe six students on May 31st. The attendance record for that day shows that we had fourteen students who were actively engaged in their program, and a smaller group of students who were absent for the day. On May 31st we had two students who were not physically at the school during the time of the teams visit; they were participating in scheduled off-campus work experiences. This was noted in the daily attendance log.

On May 31st we did have four students who were absent without an excuse. An absence is considered unexcused when we do not hear from the guardians or the student at the beginning of the school day and school staff were unable to contact guardians despite multiple efforts made throughout the day. We endeavor to contact all students and families when a student has an unexcused absence by the end of each day. If we are unable to do so, we continue to reach out until we have made contact so that we can understand the reason that a student was absent. In addition, whenever a student leaves before the scheduled end of the day, we note the approximate time of their exit in the attendance log and inform their guardian to identify immediate and long-term responses. We were able to identify where students were throughout the day on May 31st.

Response to Concerns about Students Leaving School Outside of Expected Dismissal Times:

General information about how we address any student exiting school before the end of the day is in our Policy and Procedures binder. The specific policy related to leaving school early in response to significant behavioral challenges is contained in *Mill School Policy 2.15 Student Discipline Policy*. Students may exit early in response to specific concerns about health and safety. As you know, we have students who have histories of violent behavior. Some of these students continue to have episodic incidents of violence that create an imminent risk to the health and safety of others. We do everything we can to keep all of our students in school for the entirety of each day, and will only support early dismissal when we are concerned about imminent threats to health and safety.

We have student specific early dismissal plans for those individuals who have predictable patterns of violence that create safety risks. These plans are created in collaboration with the LEA representatives and legal guardians. When a student has a pattern of absences we convene a team meeting, including the LEA and legal guardian, to discuss how we can help that student to improve their attendance and whether we need to adjust the contract to reflect a change in status from full-time to part-time or from part-time to full time.

Response to AOE Concerns About Adherence to Compulsory Attendance Requirements:

Each student is enrolled at the Mill School with the approval of their legal guardian. The conditions of their enrollment are bound by contractual agreement with the LEA. Every contract includes an attendance clause. We do have students who, for a variety of reasons, may not be enrolled full-time. In these cases, we reflect their part-time status in the school contracts and adjust the tuition rates to reflect this status. For students who have specific plans that include early dismissal for known concerns related to health and safety risks, we include that information in their IEPs and create early exit plans with the input and consent of the LEA and legal guardians. In addition, we have students who demonstrate episodic difficulties controlling their behaviors and need to leave early. In these cases, we make plans with legal guardians to have them exit before the scheduled time, with the expectation that they will return the next school day. We also inform the LEAs when we need to have a student leave early and will call a team meeting to discuss intervention options and alternative plans. If the issues related to their early dismissal continue, we alter their status from full to part-time, reflect this change on their IEPs, and make the needed tuition adjustments. We never suspend students; when they exit school as the result of health and safety risk, we ask them to return as soon as they are ready to do so – even on the same day. We made copies of all student contracts available for AOE staff to review on May 31st and in the follow up visit of September 6th. Therefore, the Mill School meets all the requirements of § 1121.

Response to Concerns About Adherence to Rule 2227.9 Requirements:

We keep a register of daily attendance for each of our enrolled students. This includes identifying the specific programs they are engaging in each day (e.g., specific classes, specific projects, work experience, individualized programming, etc.), identifying when a student is absent, whether that absence is excused or unexcused, and specific times that a student arrives and/or leaves if that falls outside of the typical school hours. We made all this information available to AOE review staff on May 31st and September 6th in two ways - one in student specific data summary binders and the other in the raw data binders we keep for the entire school population. We believe that the Mill School meets all the requirements of Rule 2227.9

Response to Recommendation for Two-Year License Renewal.

We are hopeful that once the AOE review team has had the opportunity to review the information in this response you will agree that we have provided the needed information to fully address any concerns that the team had related to student attendance.

We are confident that we have ample evidence to demonstrate that the Mill School meets the requirements for State Board of Education endorsement of a full approval period. In consideration of information that we have provided in this communication, we request the AOE re-evaluate the term of our licensure renewal and recommend we receive a full five-year licensure.

Respectfully,

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