

Renewal- The Mill School

Independent School Review Report

General Education & Special Education

Site Review Conducted - May 31, 2022

Submitted by Independent School Review Team Member:

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Site Review Scope of Work and Purpose

This report confirms The Mill School's program requirements under State Board of Education Rule 2227 for ensuring that a renewal application and required supporting documentation was submitted on time with the Agency of Education. The Mill School is seeking a renewal of general education and special education programs.

The special education liaison paid a second visit to The Mill School to conduct a review of special education student files in June.

General Education

Members of the Agency's review team met with The Mill School staff on Tuesday, May 31, 2022. Interviews were conducted at the school's location at 278 East Allen Street in Winooski. School personnel present for interviews and classroom observations included the school's founder and interim education program director, a licensed special educator, general education instructors and clinical staff members.

School Philosophy & Educational Objectives

State Board of Education Rule 2225.2, 2225.5

School Philosophy

Per The Mill School's application:

"We offer a personalized education program in a small setting.

We are relentlessly optimistic and help our students build a positive future for themselves.

We prepare students for a future after school.

We recognize and appreciate the difference in each student and work to develop a plan based on the student's strengths and interests.

Preparing learners for life...no matter what."

Program Objectives

The school's website describes the school's stated objectives as:

"We offer a variety of educational opportunities to address individual needs, each designed to help students succeed in school and their communities.

We're committed to returning students to their local schools and communities. We teach students how to manage themselves, work on projects and activities that they find useful and interesting and integrate these projects into their daily school routines. We prepare students for life after school by helping them develop the ability to regulate their behavior and manage their environment.

We help our students learn how to judge "big deals and little deals" in a reasonable way, to recognize when they are "ready" or "not ready" to take on a task or interaction with another person, and we support them to learn how to respond to life in a positive and pro-social way.

We help students learn to be successful in school and life.

We are positive."

School Enrollment

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

Agency review of intake documentation in conjunction with staff interviews, confirmed that student enrollment is completed in compliance with SBE Rules and 16 V.S.A. The school's calendar follows traditional number of days. The school serves students in grades six through twelve.

A system for securing enrollment documentation exists and ensures confidentiality of referred student information. Additionally, student records comply with requirements for on-site storage, limiting personnel access to a per-need basis. At the time of the site review, on May 17 2022, twenty-two students were enrolled in The Mill School, grades seven – twelve.

However, the Agency's review team was unable to verify The Mill School's system of student attendance. On the date of site visit, the school confirmed that 22 students in grades 7 – 12 were enrolled FY22. Only six students were observed in either classes or receiving 1:1 individualized support service.

During the exit interview with head of school, Agency reviewers specifically requested access to student enrollment and attendance records as well as an explanation for lack of students on-site during site review. The head of school explained that students are provided, each morning, with an individualized check-in as well as an entire community morning meeting to determine each student's readiness to "be available to learn for the day." Students are served breakfast at the start of the day. After breakfast and meeting check-ins, students who are "not available to learn, are released through a planned leave process."

Independent School and Special Education review team members could not determine the accuracy of attendance records when compared to leave plan agreements. Reviewers could not verify, during the May 31st site review, that the school was meeting the statutory requirement for compulsory attendance or State Board Rule 2227.9 requirement that the school maintains a register of the daily attendance of each of its enrolled students.

Governance

State Board of Education Rule 2225.4

The Mill School is a for-profit approved independent school owned by Belvedere Health Corporation with headquarters in Albany, New York. The Mill School's CEO and CFO are based in Albany with day-to-day operation of the school assigned to the program director. This position is on-site in Winooski, Vermont.

The Mill School's renewal application describes specific roles and responsibilities for the school's staff and parent corporation Board members as:

"It is the role of the President and Chief Operating Officer of The Mill School to oversee administrative and operational supports to The Mill School. In addition, Belvedere Services LLC provides direct administrative supports to daily operations; these include Human Resource and Payroll services, Quality Assurance services, oversight of Policies and Procedures, legal services when required, and other administrative services as needed."

The day-to-day governance and operations are locally managed by the school Director who is supervised daily by the Chief Knowledge Officer who is responsible for interacting with the Chief Operating Officer and Company President to assure compliance with organizational policies and administrative requirements.

The school Director provides day-to-day supervision to the teaching, administrative, and clinical staff and is also the primary liaison with local schools and community service agencies. The Chief Knowledge Officer provides daily oversight for pedagogical and clinical supports...

“There are three groups that also provide advisory and review functions to school operations:

1. Admissions Committee. This committee reviews each student recommended for placement in the program to assure that their needs can be adequately met in the program and makes recommendations for initial program placement and curricular supports.
2. Program Development Group. This ad hoc team is developed with the purpose of evaluating the effectiveness of approaches, developing innovative programs, and assuring that the school program includes evidenced-based practices
3. Balanced and Restorative Justice Group. This is also an ad hoc group that is designed to provide a structured forum for students to address behavioral and social infractions demonstrated by peers in a positive and restorative manner. The group includes student input with the direct oversight and facilitation of school staff.”

Minimum Course of Study & Required Assessments

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

The Mill School’s curriculum development and instruction are based upon Common Core State Standards, Proficiency Based Graduation Requirements and Personalized Learning Plans (PLPs). The Mill School’s renewal application identified four strategies for differentiation of the curriculum employed by all instructors to ensure students can access learning by grade and ability. The renewal application states:

“We differentiate instruction in four primary ways:

1. Content Differentiation- lesson content that covers the required proficiencies
2. Process Differentiation- teachers will deliver instructional material in a manner that provides visual, auditory, and kinesthetic opportunities to learn and demonstrate mastery
3. Product Differentiation- this includes any student created project or product that demonstrate the mastery of the content (e.g., tests, projects, reports, or other creative activities)
4. Environment Differentiation- instructional approach includes changes and adaptations in the environment that address the physical and psychological elements of instruction”

Delivery of Minimum Course of Study

Observations were conducted by the Agency’s review team during English, history, and an elective class. The Independent School Team member observed a multi-graded history class. All students received the same lesson assignment sheet, and verbal instructions at the beginning of class. The Independent School Team member did not identify evidence of differentiation of instruction by grade or ability level or observe that the history lesson was designed to meet one or more of The Mill School’s stated differentiation goals.

The Independent School Team reviewer observed an English Language Arts class (ELA). The English instructor's lesson included student learning accommodations by grade and ability. This was evidenced by the ELA instructor's use of a variety of modalities intended to reach all learners meeting The Mill School's stated differentiation methods. The English instructor linked the lesson with previously learned information for each student by referencing previously completed student assignments and student personalized learning plan goals. Visual supports, auditory instructions, and graphic organizers were utilized by the ELA instructor to support students with a variety of learning needs enabling equal access to the lesson's directions, class activity and to ensure task completion.

Professional Staff

State Board of Education Rule 2225.8

The Agency's review team confirmed that The Mill School's special educators hold a current Vermont license and are directly involved in providing services to students. All instructional staff assigned to core academic areas are qualified to teach in their respective classes, as required. Instructors and support staff engage weekly in a variety of staff meetings with mandatory attendance by classroom teachers, special education teachers and support staff. Student progress and treatment programming are reviewed for efficacy during both whole staff meetings and during meetings held between academic program director and a class instructor, as needed.

All staff members are 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.

All members of The Mill School staff engage in annual professional development in social emotional learning, positive behavioral intervention training, special education, and content area development.

Staffing Safeguards:

Background checks are conducted prior to start date for all newly hired employees. Fingerprint-supported criminal records check, and VT adult/child registries are checked annually, and both reports are contained in a confidential filing system available for review upon request.

Mandatory Reporting Procedures:

The Mill School implemented and has published mandatory reporting procedures and expectations in the staff handbook. Included in the policy are provisions for reporting child abuse and the circumstances in which a case must be reported to school administrators and appropriate authorities. Staff participate in required annual refreshers regarding best practices on policy development, implementation, and compliance with mandatory reporting procedures.

Health & Safety

Emergency Services:

Each month all staff and students practice fire and emergency safety evacuation protocols, including lock-down and shelter in place strategies that are based upon trauma informed practices.

All staff members are either trained annually in CPR and First Aid or participate in refresher programming during August in-service. Parents, guardians, and custodial adults are kept informed of health, medical and program safety protocols, procedures and are provided annually with a copy of all policies in a family handbook.

Nursing Services, Medications, and Immunization Records:

The Mill School does not have a full-time nurse on staff and relies upon 911 Emergency Service responders, as needed. Designated staff members are trained in proper dispensing of student medications, on how to log medication and to ensure medicines are locked securely in the designated cabinet. Student immunization records are included in student files with family/guardian permission slips and stored in a secure, locked filing system. Student records are kept using a secure, confidential digital student record system, as well. All files are up to date.

Hazing, Harassment & Bullying Policies

The Mill School's, hazing, harassment, and bullying (HHB) policies and corresponding procedures comply with the Agency of Education's required policy. The school's entire staff are 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

The Mill School's facility is clean, and in good repair. There are several sitting areas in which the school conducts morning meetings with students and instructors and are utilized during parent teacher open house, twice a year.

The Mill School's administration works with the local authorities to complete annual fire safety inspections for extinguishers, the hard-wired fire alarm system and HVAC heating/cooling system. Emergency evacuation signage is prominently display in each classroom and in common areas. A current Certificate of Occupancy is on file at the Agency of Education.

Financial Capacity

To meet SBE rule 2226.11, The Mill School submitted written confirmation from the Belvedere Health, LLC's auditors that The Mill School's governing body has approximately \$560,000 in cash on deposit with financial institutions. In addition, the entities owned by the governing body have access to a \$1,000,000 line of credit. There is no outstanding balance on this line of credit.

Special Education Report

Based on the Rules for Special Education Approval for Independent Schools, the special education team finds that The Mill School has met minimum criteria for the renewal of their approved status.

The Mill School was visited by representatives from the AOE on May 31, 2022. During the visit, Agency staff interviewed school staff, toured facilities, and observed staff/student interactions in and outside of classroom settings. Subsequently, an AOE staff member from the special education team reviewed student files and IEPs. Comprehensive file reviews were conducted based on the number of sending LEAs, and the disability categories requested for approval. Files were remarkably detailed, well-organized, and comprehensive. Of the files reviewed, only one student's service log was inconsistent with the student's attendance log. It was difficult to ascertain exactly when students were and were not in school for full or partial days.

Notwithstanding concerns about compulsory attendance, there were no areas of significant concern highlighted in the visit, and The Mill School produced satisfactory evidence, within the file review process, that the school can meet the needs of the students it currently serves. An interview with the school director revealed that this was something the school was working to improve upon and that team meetings were held consistently for students with whom attendance emerged as an issue of concern.

The following rules were reviewed for compliance:

2228.1 – Related to the categories of disability that the school can support through its provided services: The Mill School demonstrated that it has policies, procedures and staff training to appropriately support students in the disability categories of Autism Spectrum Disorder, Emotional Disturbance, Other Health Impairment, Specific Learning Disability, and Traumatic Brain Injury.

2228.3 – Related to the maintenance and implementation of written policies and procedures in Rule-defined areas: The Mill School has demonstrated that it is satisfactorily maintaining and implementing written policies and/or procedures in the areas of: (1) admissions, (2) least restrictive environment, (3) discipline, (4) graduation, (5) faculty qualifications, and (6) faculty-student ratios, as required by SBE Rule.

2228.3.1 – Related to appropriate coordination with sending responsible agencies, parents, public agencies, and other service providers: The Mill School has demonstrated evidence of (1) minimum maintenance of educational records, and coordination with LEA and parents through data and file review, (2) participation in evaluation and IEP procedures through IEP review, (3) implementation of IEPs through progress reporting and behavioral data, (4) providing prior notice to the sending LEA regarding the need for a change in a child's program or placement.

Approval Recommendation

The Agency's review team recommends a two-year approval to the Secretary due to findings associated with compulsory attendance requirements and maintenance of a register of daily attendance of its enrolled students (SBE 2227.9).