

AGENCY OF EDUCATION

Barre, Vermont

TEAM: Independent School Team

ITEM: Will the State Board of Education grant renewal of general and special education independent school approval to serve students in grades 6-12 within the disability categories of Emotional Disturbance (ED), Specific Learning Disability (SLD) and Other Health Impairment (OHI) to the Connecticut River Academy in Bradford, VT?

Will the State Board of Education grant approval for additional special education categories of ASD, DD, ID and MD?

SECRETARY'S RECOMMENDED ACTION:

- 1. That the State Board of Education grant renewal of general and special education independent school approval to serve students in grades 6-12 within the disability categories of Emotional Disturbance (ED), Specific Learning Disability (SLD) and Other Health Impairment (OHI) to the Connecticut River Academy in Bradford, VT. This approval is for a term of one year ending on June 30, 2019.**
- 2. That the State Board of Education deny approval of additional special education categories of ASD, DD, ID and MD.**
- 3. That the school immediately reports to the Agency of Education whenever any changes occur in enrollment, programs, policies, facilities, financial capacity, staffing, or administration during the approval period.**

STATUTORY AUTHORITY: 16 V.S.A. § 166

BACKGROUND INFORMATION:

1. An independent school may operate and provide elementary or secondary education if it is either approved or recognized by the State Board of Education.
2. The State Board of Education shall approve an independent school if it substantially complies with the Board's rules for independent schools, promulgated as Series 2200 (Independent School Program Approval).

3. Connecticut River Academy (CRA herein) is seeking approval for additional disability categories simultaneously with approval to provide general education.
4. Upon receiving CRA's application, the Secretary appointed a review committee to visit the school and make a recommendation as required by SBE Rule 2222. Because CRA was seeking approval to provide both general education and special education services, the recommendation consists of two separate reports.
5. CRA is an independent, privately owned day facility owned and managed by Becket Family Services located in Bradford, VT. The school serves day students from area LEAs and state-placed residential students placed by Department for Children and Families (DCF) or Department of Mental Health (DMH) at Newbury House in Newbury, VT. It has programs at leased facilities in New Hampshire.
6. CRA provides educational and therapeutic services for up to 40 male and female students. The students are grouped roughly by age and ability. CRA's students are in need of specialized services in a self-contained classroom environment due to academic and emotional difficulties that interfere with their ability to function in a traditional school environment. The school serves previously traumatized students with emotional disabilities, leaning impairments, specific learning differences, and other health impairments. The core purpose of the school is to provide a safe, therapeutic, effective educational program coupled with clinical support for all students. Many students are on individual education plans (IEPs) and the LEAs work with CRA staff to write and implement IEPs. Students are occasionally reintegrated into public school programs from CRA but, generally, they finish their general education at CRA.

GENERAL EDUCATION REPORT AND RECOMMENDATION:

7. Peter Gilmore (the reviewer) performed the general education portion of the review. Review Team report is attached. See attachment W-1. The reviewer found that CRA's course of study is tailored to student needs, is presented in a highly individualized way and is adequate to meet the educational purposes of the school. Teachers and staff work in teams and appropriately oversee the students during the entire school day. The school has adequate and secure administrative systems in place for running the organization.
8. The reviewer found the Bradford school facility barely adequate, but the New Hampshire facilities better. There is no plan in place to guarantee improvements to the Bradford facilities will be made.
9. The reviewer found that the school employs professional staff in sufficient number who are qualified in the areas to which they are assigned. Most have experience teaching the age groups they encounter. Professional development occurs regularly and is appropriate to the techniques used with the students.
10. The reviewer expressed concern that the school's higher than normal rate of staff turnover has created a situation over the past few years that has been unhealthy,

resulting in the loss of much of the history, culture, proven techniques, and traditions of the school. Mentoring of new teachers is left up to a very few veterans.

11. The reviewer found that CRA is committed to serving a very needy population of students in an individual yet holistic way, but that to be a highly effective institution CRA needs to: begin a strategic planning process that will result in a 3 to 5 year plan for improvement; conduct a thorough analysis of staff turnover resulting in a plan for effective improvement and retention; and evaluate the physical plant and develop a plan for capital improvements. He recommends granting conditional renewal of general education independent school approval for three years, through June 30, 2020, contingent upon the school producing a written plan by June 2018 for implementing strategies by June 2019 and compliance with the assurances in the General Education Approval Application. He also recommended a revisit of the school by the Agency of Education in June 2020.

SPECIAL EDUCATION REPORT AND RECOMMENDATION:

12. The special education reviewers conducted an in-depth review of special education services. Review Team Report is attached. See attachment W-2. They reviewed the files of 16 Vermont students on IEPs together with the school's staffing schedules and service contracts. The reviewers found that provision of services proscribed by the students IEPs were not well documented – for four of the 16 students, service logs were missing or incomplete and the service log of one student did not match the IEP. Even more concerning is the reviewers' finding that a significant percentage of required services could not have been provided based on documentation of staff time. While 45 percent of IEP services could have been delivered based on staff schedules and contracts, it appears that the school lacked the capacity to deliver the remainder of the required services. In other words, the reviewers could not confirm that some IEP services were provided and in other instances, the reviewers concluded that the services were not provided. Based on the school's records, the reviewers could only confirm that one of the 16 students had received 100 percent of the IEP services. In two cases, the team could not confirm that any IEP services were provided.
13. The reviewers found that while the staff interviewed was knowledgeable, cooperative and professional, and the school had certain essential written policies in place (e.g., admissions and discipline policies), the school did not demonstrate the policies, procedures and staff training to support students in the disability categories of specific learning disability, emotional disturbance and other health impairment.
14. The reviewers recommended denying approval for special education services.

RESPONSE FROM CONNECTICUT RIVER ACADEMY:

15. Secretary Holcombe invited CRA to respond to the Review Committee's report and recommendation pursuant to SBE Rule 2222.2 and 2228.5(3). CRA response is attached. See attachment W-3.
16. CRA's response acknowledges its general agreement with the general education report and recommendations and notes that the school has already undertaken a strategic planning effort. As a result of that planning effort, the school identified the need to recruit new leadership (a new headmaster was retained and started work in August 2017), the need for highly qualified special educators, review of its documentation systems and a redefinition of the role of special educators at CRA.
17. Regarding its facility, CRA agrees that the facility is marginal and in need of improvements. CRA believes it cannot pursue those improvements due to ownership and other issues and is pursuing an alternative site in New Hampshire.
18. With respect to the special education reports, CRA minimizes some of the observed deficiencies, saying that they "primarily reflect poor documentation" and are "technical in nature." It does not address the failure to provide IEP services head on, rather stating that it does not know what "delivered" means or what the team meant when it said required IEP services are not possible for all the student. These statements were made in the context of reviewing staffing schedules and clearly refer to what services could have been delivered based on the staff available. Nevertheless, CRA correctly focuses on the need to hire and retain experienced staff. In this regard, at the time of the response CRA reported it had three experienced special educators on staff. Perhaps more significantly, CRA has obtained the help of experts, notably Jo-Anne Unruh, to identify steps the school can take to improve its special education program. As a result, it has developed an Academic Coordination Team comprised of classroom special educators, the head of school and the clinical director, which meets weekly to review the IEPs of all its students. Importantly, the weekly agenda will now include special education compliance review.

COUNCIL OF INDEPENDENT SCHOOLS:

19. The rule requires that prior to recommending denial, revocation or suspension of approval the Secretary shall obtain the written recommendation of the Council of Independent Schools. CIS response is attached. See attachment W-4. SBE Rule 2222.7. Accordingly, the Secretary notified the CIS of her receipt of the Review Team's recommendation on September 18, 2017.
20. After some delay due to CIS's Chair being out of the country on sabbatical, the CIS appointed its own team to provide a recommendation. CIS report is attached.
21. Although Rule 2222.7 does not require a visit to the school and does not define the role of CIS as either fact finding or performing a record review, the CIS undertook its own factual inquiry to see if it could verify the Review Team's findings.

22. CIS “saw a great deal of evidence that CRA had made strong efforts to address AOE’s concerns.” But since CIS “cannot recreate what AOE assessed”, it made recommendations that pertain to CRA in December rather than in May and June.
23. Although CIS identifies some areas of concern, it recommends conditional general education approval as recommended in Peter Gilmore’s report and special education approval conditional upon CRA addressing its concerns (e.g., insufficient evidence that IEP requirements were being met, need to convene an IEP meeting before or immediately after a student enrolls at CRA in order to write a service page that reflects the daily schedule). It also recommends a “timeframe of at least 12 calendar months prior to AOE review for reconsideration of the conditional status.”

SECRETARY’S RECOMMENDATION AND RATIONALE:

Recommendation. The Secretary recommends that the State Board of Education approve CRA’s application for renewal of approval, including special education approval, for a term of one year expiring June 30, 2019.

Rationale. The Review Team articulated both the strengths and weaknesses of the CRA program. Its strengths include a course of study that is tailored to student needs and adequate to meet the educational purposes of the schools (general education report) and existence of written policies in several areas such as admissions, least restrictive environment, discipline (special education report). Its weaknesses include barely adequate physical facilities, and the inability to retain qualified staff (general education report) and, most significantly, its failure to provide all specified IEP services and to completely document those it does provide (special education report). **These are serious deficiencies and there is some indication in CRA’s response that it minimizes the special education deficiencies as a paperwork issue.** Documentation of services is not a technicality; rather, it is how parents, teachers, and LEAs know that a student’s IEP is being implemented and can make informed decisions about how and whether it should be revised. On the other hand, and to its credit, CRA has undertaken serious work to improve provision of special education services indicated by creation of the Academic Coordination Team and adoption of new policies to strengthen procedures and content and recordkeeping (Appendix B to CRA response). The recommendation from CIS indicates that these changes are in the process of being implemented. CRA reports that it now has three experienced special education teachers on its staff. Approval of CRA for one year will allow the school the opportunity to see through the improvements it has begun. It will then be incumbent on the school to seek renewal of its approval.

The Secretary is not recommending conditional approval for two reasons. First, because CRA sought two approvals simultaneously, the Review Team reached different recommendations for general education (three year conditional approval) and special education (denial). Renewal for a one-year term effectively recognizes both recommendations and allows the school time to make improvements as indicated. Moreover, as observed by CRA’s headmaster, denial of approval for all special education services “would effectively close the school.” For a therapeutic school like CRA, it makes no sense to grant one approval without the other.

Second, conditional approval would create a burden on the Agency of Education to monitor improvements by CRA. Section 166 and Rule Series 2222 on the other hand create a process for a point in time review resulting in a recommendation to the State Board of Education, not a continuous monitoring process for approval of independent schools. Recognizing that a one-year approval will mean that the school must seek renewal of its approval sooner rather than later and that the Agency will have to appoint another review team upon receipt of the school's completed application, we believe that is more in line with the intent of the statute and best assures "acceptable educational opportunities for students enrolled in Vermont's independent schools."

STAFF AVAILABLE: Molly Bachman, General Counsel

Cassandra Ryan, Fiscal and Regulatory Compliance Coordinator

AGENCY OF EDUCATION
Barre, Vermont

TEAM: School Finance

ITEM: Will the State Agency of Education grant General Education independent school approval, to serve ages 6-22, in the disability categories of Specific Learning Disabilities, Emotional Disabilities, Learning Impairment, and Other Health Impairment to Connecticut River Academy in Bradford, VT.

RECOMMENDED ACTION:

That the State Agency of Education conditionally grant renewal of general education independent school approval in the disability categories of Specific Learning Disabilities, Emotional Disabilities, Learning Impairment, and Other Intellectual Disabilities to Connecticut River Academy in Bradford, VT. This approval is for three years, through June 30, 2020 contingent upon the school producing a written plan to address the concerns detailed in this report submitted by June 2018 including strategies implemented by June 2019, and a revisit by representatives of the VAE by June 2020. Approval would be subject to the school complying with the Assurances as outlined in the General Education Approval Application during the approval period.

STATUTORY AUTHORITY: Title 16 V.S.A. 166(b), State Board Rule: 2228 et.seq.

BACKGROUND INFORMATION:

Connecticut River Academy is an independent day facility providing educational, therapeutic, and reintegration services for up to 40 male and female students ages 6-22. The school is mainly located on one campus in Bradford, VT with rented program facilities and associated housing facilities/dorms at East Haverhill Academy and Newfield House nearby. Accepted students are in need of specialized services in a self-contained classroom environment due to academic and emotional difficulties that interfere with their ability to function in a traditional school environment. The school serves previously traumatized students with emotional disabilities, learning impairments, specific learning differences, and other health impairments. The Core Purpose of the school is to provide a safe, therapeutic, effective educational program coupled with clinical support for all students. Connecticut River Academy is privately owned and managed by Becket Family Services. Peter B. Gilmore visited the school on behalf of the Agency on March 3, 2017.

GENERAL EDUCATION: REPORT OF FINDINGS

1. The descriptions of the school in the Application, on the admissions brochures, and on the website are fairly accurate. The website contained the names and partial bios of at least ten staff who no longer work at the school, however the listing of administration was accurate. The Purpose, Values, and Philosophy of the school are clearly presented on the website and serve as guides for the school. The staff had a variety of interpretations of this philosophy and therefore lack a coherent understanding of an exact

mission. This however, does not keep the school from functioning beneath the philosophical umbrella as presented.

2. The course of study is tailored to student needs and is adequate to meet the educational purposes of the school. The school provides a course of study that is age and ability appropriate, and is presented in a highly individualized way. The school makes available the support services necessary to meet the requirements of a minimum course of study and its educational purposes including (a) administrative services and facilities including on-site administrators, computer databases for tracking information, emergency and safety plans, set schedules, etc., (b) counseling/clinician services including on-site counselors, therapists etc. and (c) a system of record keeping both electronic and paper that are stored in safe, inaccessible files in the cloud, at nearby facilities, and/or on site. All students are on IEPs and the sending school LEAs work with CRA staff to devise and implement IEPs yearly or as needed. Students are occasionally reintegrated into public school programs after their time at CRA, but the majority finish out their basic education there after developing life, school, work, and communication skills. For each student, the school uses a holistic team approach to educating students and according to the staff interviewed, it is effective.
3. The facilities available to the teaching, administration, and clinical staff, especially the main building on the Bradford campus, are well worn, barely adequate, and in need of improvement. The main building is a converted restaurant that has a variety of room sizes. Classrooms have uninsulated inner walls and many rooms are located below ground level – some have no windows. Offices are cramped and often shared, and a small kitchen (where food is prepared and culinary classes are taught) serves as a pass-through in the center of the facility. Much of the furniture is old, eclectic, and needs to be replaced. There is some indication of maintenance and investment, but the only plans for real improvement were dividing a lower classroom into even smaller spaces, and a possible purchase a nearby public school building. There is no long term facilities plan to guarantee future improvements.

In contrast to the main campus, the residential facilities at East Haverhill Academy and Newfield House that serve the school population are somewhat more modern and updated, although again, the furniture in the dorm I visited is in need of upgrading. The student rooms looked bare and unkempt. The “Red Barn” facility on the East Haverhill campus is a shining example of what the school could look like if it invested in facilities improvement. It was a clean modern space with a warm and inviting atmosphere, nice classrooms, a modern kitchen, and appropriate offices. The dormitory buildings meet relevant health and safety standards as represented by certificates of inspection. There are emergency, safety, and evacuation plans for the building and all are accessible to the staff. The school uses other off campus sites for specific functions such as the farm and equestrian programs – these were not visited.

4. The school employs a professional staff in sufficient number who are qualified in the areas in which they are assigned. All the general education staff have at least a bachelor’s degree in their field of instruction and some hold Masters or Professional degrees in related areas. Upon interview, the staff at CRA proved to be dedicated professionals. They each have certifications applicable to the needs of the students and most have experience teaching the age groups they encounter. Staff appropriately

oversee the students during the entire school day never allowing students to venture off on their own. Teachers and professional staff work in teams at the school, and bring experience, education, and devotion to their work. The staff interviewed showed that care and education of the students was at the very core of their efforts. Professional development at CRA is appropriate to the techniques used with the students, occurs regularly, and incorporates outside experts as well as “staff teaching staff” which takes advantage of veteran staff assisting newcomers.

Turnover of staff at CRA is a serious issue and one that must be addressed by the institution. Almost everyone interviewed (administration, clinical and teaching staff) had been at the school a year or less. The high percentage of turnover means that much of the history, culture, proven techniques, and traditions of the school have been lost over the years, and that the mentoring of new teachers and was left up to a very few veterans. There is a normal amount of turnover in staff each year at any good independent school with people moving on for various reasons, but the situation at CRA over the past few years has been unhealthy. Although the current staff feel strongly that “the right people are in place now” and “we have a good team here now”, the institution itself must insure that this important time of transition form the bedrock for the future. Schools cannot offer highly effective programs if they fail to attract, retain, and support good employees. It is recommended that a study be performed as to the reasons for staff turnover, and that new policies be implemented to address the issues. In the end, the children in their care will benefit greatly by creating veteran staff who are experts in their fields as well as in the culture and techniques that will make the school successful in the long run.

Professional development at CRA does occur regularly and most staff are exposed to it in weekly meetings. New staff undergo an orientation and are brought up to speed quickly. The school is dedicated to self-improvement with the common response by faculty to this query being “of course” or “indeed”. Evidence of improvement was shown in new approaches and curricula brought onboard by new staff. Overall, this aspect of the school was a unifying factor, and one that bodes well for the future.

5. The back office administrative systems at CRA are secure and appropriate for the running of the organization. On and off-site databases serve as secure storage for admissions and contact information, daily attendance along with all biographic information on students and families, academic records, immunization records, performance tracking, etc. The school employs a bookkeeper who works with the main office at Becket Family Services to maintain a system of accounts payable, accounts receivable, budget tracking, and payroll. There is a yearly budgeting process that involves the main administrators with input from some staff. Review of a recent budget and other financials was not made available, but conversations with the current administrators and individual faculty assured that all is financially intact at the school.

RECOMMENDATIONS TO THE SCHOOL

Connecticut River Academy is an organization that is committed to serving this very needy population of students in an individualized yet holistic way. Stories were shared of successful students reintegrating with their public schools or “graduating” and moving on to adult programs. However, in order to be a highly effective institution the school needs to address some very specific issues with targeted actions:

- A Strategic Planning process initiated by the Board and including input from all members of the CRA community resulting in a 3-5 year plan for improvement.
- A thorough analysis of staff turnover with specific plans for effective improvement.
- An evaluation of the building facilities on the main campus, and furniture and supplies at all sites associated with the school, with plans for capital improvements.

Respectfully Submitted,

Peter B. Gilmore

Approval Recommendation: Deny approval for all special education services

Rationale: CRA did not meet expectations for maintenance of records, implementation of IEPs or legal agreements with LEAs.

School Description: The Connecticut River Academy (CRA) is seeking re-approval in the areas of: specific learning disability, emotional disturbance, and other health impaired as well as initial approval in autism spectrum disorders, developmental delay, intellectual disability, and multiple disabilities. CRA, located in Bradford Vermont, was visited by Agency of Education staff on 5/12/17 and 6/29/17. According to initial reports from Connecticut River Academy 25 Vermont students were receiving educational services at CRA. The students are grouped roughly by age and ability. The facilities provided the amount of space necessary for the new school structure, received 7/13/2017. The school has the resources to provide academic, behavioral, and community education. The design, layout and organization of the space is flexible and conducive for teaching a wide range of students and for creating a variety of working environments.

Review Description: During the visit the Agency employee interviewed staff, toured facilities, and reviewed 16 student files and IEPs, staffing schedules, contract services, and other school documentation. File reviews were conducted for all Vermont students.

Review Findings:

2228.1 - CRA did not demonstrate the policies, procedures and staff training to support students in the disability categories of; specific learning disability, emotional disturbance and other health impaired. Evidence is provided below.

2228.3 - CRA demonstrated that they have 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. It is recommended that CRA add a special educator to the admissions committee to ensure that student needs can be met.

2228.3.1 - CRA did not meet expectations for maintenance of (1) educational records, and coordination with LEA and parents (2) participation in evaluation and IEP procedures (3) implementation of IEPs

Evidence:

1. Based on a review of 16 IEPs and school documentation of schedules, staffing and contract services:
 - a. Required IEP services are not possible for the students served

- i. It was possible to for students to access 45% of the IEP services listed. These services were possible, but not confirmable, due to lack of information provided on special education documentation and schedules.
 - ii. 1 of 16 students had 100% of the services confirmable
 - iii. 2 of 16 students with 0% of the services confirmable.
- b. Required IEP services are not tracked or delivered appropriately
 - i. 4 of 16 students had service logs that were absent or not completed
 - ii. 1 of 16 student had a service log that did not match the services listed on the IEP.

2228.3.2 –CRA meets expectations regarding licensed staff. Licensed staff were reviewed, with questions around high turnover and license status for Special Education Teachers.

Evidence: Staff professional development and training take the form of a general new hire training as well as ongoing, but informal support and observations from supervisory staff. All staff receive training on trauma informed care, mindfulness and implementing Positive Behavior Interventions and Supports. Staff reported feeling supported with on the job training with specific students and behavior plans as well as on-going feedback during observations and meeting times. The staff interviewed were engaging, knowledgeable, cooperative and professional. CRA staff reported a positive and collaborative working relationship with Local Educational Agencies (LEAs) to support the student’s educational programs.

2228.4 –CRA did not follow policies, procedures and written agreement outline tuition and establish division of legal responsibilities with regards to students on IEPs.

Evidence:

- 1. Maintenance of Agreements with LEAs
 - i. 8 of 16 files had inadequate contracting documentation including missing contracts, or contracts that were entered into after the allowable 30 days. For example, one contract was signed June 2017 for a student who began receiving services as early as September of 2016.



Connecticut River Academy
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October 17, 2017

Re: Connecticut River Academy

Dear Secretary Holcombe:


In response to your letter of September 18, 2017, regarding Connecticut River Academy's ("CRA") application for renewal of its general education and special education approvals as an approved independent school, I am enclosing our comments on the Review Committees' reports and recommendations, for your consideration before making a recommendation to the Vermont State Board of Education.

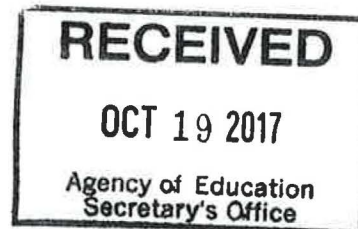
As you indicated in your letter, the Rules also require that, prior to making your recommendation to the Board, you will obtain the written recommendation of the Council of Independent Schools. On September 27, 2017, I contacted Mark Tashjian, whom I believe to be the current chair of the Council, asking him to contact me to make arrangements for the Council's review of CRA. We heard back initially from Mr. Tashjian advising he was on sabbatical, but we have not had further contact from him (or anyone else) about proceeding with the CIS review. We believe that due diligence on the Council's part pursuant to the statute and the Rule requires an independent, firsthand review of the school, and we are awaiting further contact from the Council in order to make arrangements for this review.

If we can provide any information further to our response, or if you would like to meet in person, we would be pleased to do so. Please be assured that we are committed to addressing the Agency's concerns in this matter and to working collaboratively toward an appropriate result.

Thank you for your cooperation.

Sincerely,


M. Amos Kornfeld, Ed. D
Head of School



RH
MB
CR



Connecticut River Academy

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Connecticut River Academy
551 Lower Plain
Bradford, VT 05033

October 16, 2017

Rebecca Holcombe, Ed.D.
Secretary of Education
State of Vermont
219 North Main Street
Suite 402
Barre, VT 05033

Dear Secretary Holcombe,

We are in receipt of your letter dated September 18, 2017 with attached committee reports that recommended (i) conditional approval of General Education Independent School Approval for three years and (ii) denial of approval for all special education services.

General Education Approval

With respect to Mr. Gilmore's report and recommendations, we are in general agreement and offer the following:

Although Mr. Gilmore's report is dated March 14, 2017, it was submitted to us very recently. Prior to receipt of this report, we had already implemented a strategic planning effort beginning with a six month program evaluation which utilized the World Café and Appreciative Inquiry models to elicit feedback from all employees at Connecticut River Academy (CRA) and inform administration regarding next steps in the change process. Based on this feedback and other indicators, the School identified the need to recruit more experienced school leadership. As a result of this decision, I was retained as Head of School and started work in August of this year. During the spring of 2017, I was also able to begin orientation to the school and its strengths and needs, and to participate in the strategic planning effort (before leaving on a previously planned cross-country bike trip). My resume is attached as **Appendix A**.

Other areas of immediate change identified in this process included a redesigned school schedule focused on smaller class size to more effectively deliver general and special education services. With input from our various staff and myself, this schedule has been implemented for the 2017-2018 school year. Our new schedule affords built in daily teacher planning time, retention of a co-teaching model, full-integration of clinicians into the school day, and the expansion of vocational programming to focus on personalized extended learning opportunities. Our extended learning opportunities have the added value of providing learning that also has therapeutic value to better meet the needs of our current population, many of whom have significant trauma histories. Other areas identified in the review



Connecticut River Academy

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process included the need for highly qualified special educators, a review of documentation systems, and a redefinition of the role of special educators at CRA. In addition, our documentation systems were reviewed by the Academic Coordination Team (consisting of all special education staff, the Clinical Director and the Head of School), resulting in changes both to procedures and forms used to track services. Our new procedures and forms are attached as **Appendix B**. Based on these procedures, we can now affirmatively state and illustrate the following:

- Our students receive specialized instruction from a special educator within a subject classroom.
- Students attend classes usually with 3-5 students.
- Teachers evaluate students' academic and behavior goals using daily progress reports.
- Service delivery plans are monitored and tracked daily.
- Each student has an Individual Treatment Plan that addresses a student's safety and behavior, family matters, medical issues, education, and adult living preparation. The treatment team consists of a special educator, mental health clinician, permanency worker, residential staff and administrators.
- Students attend a daily class devoted to social-emotional learning.
- Students attend a daily class dedicated to transition and remedial skills.
- CRA special education teachers, head of school, and clinical director meet weekly.
- Teachers meet each morning before school for student updates.
- Students with 1:1 support have daily plans coordinated by their case managers.
- Each week the Treatment Team meets to discuss students.

Further, the role and expectations of special educators was redefined to support better service delivery and their ability to manage documentation, as also illustrated in Appendix B.

The foregoing represents changes that have already taken place in the program pursuant to our strategic planning effort. However, we agree that the effort must be ongoing and expanded further to include both internal and external feedback. To this end, a long term strategic planning committee is being constituted, which I will chair and which will meet quarterly.

The Strategic Planning Committee will address structural, administrative, and programmatic issues as needed, with the understanding that "big picture" planning and thoughtful assessment sometimes need to take place outside of the day-to-day pressures staff face routinely.

With respect to our building facilities, we would note that Connecticut River Academy, under prior ownership, operated out of this site for over a decade. Since assuming control of this program four years ago, we have made numerous facility improvements, but are in general agreement regarding the marginal nature of this facility without significant renovations. Last fiscal year, we evaluated the possibility of such renovations, including completion of architectural renditions of what a modified facility might look like. For a variety of reasons, including legal issues relating to the fact that these premises are leased and the complex includes other tenants, we cannot pursue these



Connecticut River Academy

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improvements. Further, our planning effort raised serious questions about the long-term viability of this site to serve as a hub for the kind of experiential, hands-on, personalized learning that we hope to develop as a highly effective school for our population of students.

Based on these considerations, we have instead focused on identifying a potential new site for the program. With school consolidation efforts in Vermont, one hope was that a local school facility might become available. This does not appear likely. Alternative sites in Vermont have been considered, but we have not identified a viable alternative at this time. Our team has most recently been able to identify a potentially viable site in Haverhill, New Hampshire. Negotiations are underway to secure this site, and we are very optimistic that we will have access to this site within a time frame that would allow us to relocate the program at the end of the current academic year. Relocation to this site will require approval from the State of New Hampshire Department of Education, and we are also optimistic that this approval can be obtained on a timely basis.

Special Education Approval

In regard to the recommendation that CRA be denied approval for all special education services, we note that this would effectively close the school in the midst of an academic year and believe there should be a greater opportunity to develop a plan of correction, at least to permit us to complete the school year. As noted above, we have already made a considerable effort to correct the deficiencies, including our strategic planning recognition of the “the need for highly qualified special educators, a review of documentation systems, and a redefinition of the role of special educators at CRA.” Pursuant to these needs, we made a special effort to retain the services of Rachel Wood, an experienced special educator currently on staff but who had been offered a position by a Vermont School District. We also recruited two experienced special educators for the 2017-2018 school year: Charlie Reed and Tom Elverson. Our special education team’s resumes are attached as **Appendix C**.

I began work in late August and after some initial focus on providing the leadership needed to commence the school year and implement our new schedule, I have begun to reach out to external parties who may be able to further assist the development of our special education program. I have met with recognized experts in the field, most notably Jo-Anne Unruh, who has reviewed the September 18, 2017, letter from the AOE, and recommended action steps for us to take. Ms. Unruh was Director of Special Education at OESU and then Hartford from 1986-2006; consultant with VT AOE with the Multi-Tiered System of Supports, 2007-2012; and Executive Director, Vermont Council of Special Education Administrators, 2012-2017. Upon receipt of verbal feedback during the exit interview following the Special Education onsite on May 12, 2017, CRA developed the Academic Coordination Team (ACT) mentioned above, which is comprised of classroom special educators, the Head of School and the Clinical Director. This team has been meeting weekly to review the Individual Education Plans of referred students for both residential programs and the day treatment program. The goal of this Team is to gather information regarding appropriateness of academic placement, to review services, including recommendations, and to identify academic assignments from special educators directly involved the classroom. The team has met weekly since its implementation and the agenda will now include special education compliance review, per Ms. Unruh’s recommendation.



Connecticut River Academy

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I believe it is important to recognize that CRA is still a young and developing program that serves a very vulnerable population that can make it difficult to retain staff and also sidetracks our team on more immediate behavioral and safety matters. I have significant experience working with this population in both public and private settings and have been impressed by the commitment of our staff and fellow administrators. Notwithstanding the noted deficiencies, which are mostly documentation related, the Connecticut River Academy is a good school that cannot easily be replaced. This review represents the first time that we have been offered feedback through the review process since we acquired the school. While deficiencies were noted, which we certainly want to acknowledge, some are of a technical nature and some represent apparent changes from previous policy, as we had not been made aware of them in our previous interactions with Vermont regulators. The most fundamental concern, however, regards our ability to hire and retain experienced special educators. As noted above, we have made significant progress on this issue, but we must note that this is a serious problem all Vermont schools, both public and private, currently face and that it is likely particularly difficult for us, given our especially challenging student group. We are gratified and relieved that we now have three experienced special educators on staff, but we should also note that this required substantial and sustained efforts, including out-of-state recruiting.

It must be stated again that denying us approval to offer special education services would have serious implications for the students we educate, nearly all of whom require those services. Connecticut River Academy serves males, ages 11-21, who have failed to thrive in a traditional school setting due to a wide range of mental health diagnoses, most notably complex developmental trauma. This often correlates with the following disability categories: Specific Learning Disability, Emotional Disturbance, and Other Health Impaired. The behavioral presentation of these students can be highly aggressive and assaultive which (i) posed a safety risk in their former placements and (ii) requires a comprehensive trauma-informed approach to best meet the educational needs of this very specific population of students. CRA offers such a comprehensive approach, which includes traditional academic subjects, experiential learning opportunities, trauma-informed individual and group therapy, animal-assisted therapy (including equine), adventure counseling, behavioral modification, family counseling, diagnostics, and specialized tutoring.

Very few programs can offer this level of service and, while this alone does not justify continuation of our special education approval, it does suggest that an opportunity ought to be given to implement a plan of correction before withdrawing from our students the opportunities we offer them. It should be noted that the various deficiencies cited by the Committee do not represent safety issues and primarily reflect poor documentation that was identified during the site visit. We do not mean to minimize the importance of accurate record-keeping, and we acknowledge weaknesses that previously existed; however, under new leadership we have addressed these weaknesses and put in place new or revised policies and practices to prevent future occurrences. We have already restructured this aspect of our program and have recruited and hired additional experienced special educators. Accordingly, we feel strongly that we have substantially addressed the concerns in the Committee report. In addition, we



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note that many of our special education processes and procedures are substantively exemplary, and we believe that the actual substance of our delivery of special education services should be taken into consideration.

Relative to the specific recommendations, we offer the following comments in response to each finding, shown in italics:

2228.1 - CRA did not demonstrate the policies, procedures and staff training to support students in the disability categories of; specific learning disability, emotional disturbance and other health impaired.

The “Evidence” cited in the Report to support the above finding is as follows:

1. *Based on a review of 16 IEPs and school documentation of schedules, staffing and contract services:*
 - a. *Required IEP services are not possible for the students served*
 - i. *It was possible for students to access 45% of the IEP services listed. These services were possible, but not confirmable, due to lack of information provided on special education documentation and schedules.*
 - ii. *1 of 16 students had 100% of the services confirmable.*
 - iii. *2 of 16 students with 0% of the services confirmable.*
 - b. *Required IEP services are not tracked or delivered appropriately*
 - i. *4 of 16 students had service logs that were absent or not completed.*
 - ii. *1 of 16 students had a service log that did not match the services listed on the IEP.*

This “Evidence” section does not seem to speak at all to “policies, procedures and staff training.” We find this section of the Report confusing and are largely unable to tie the “Evidence” section back to the findings, and we would appreciate further explanation of the basis for the 2228.1 finding. We understand the portions that relate to documentation to be related to the 2228.3.1 finding. We do not know what “delivered” means, other than that documentation apparently was missing. We also do not know what the following means: “Required IEP services are not possible for the students served,” nor the following: “It was possible for students to access 45% of the IEP services listed.” Kindly clarify this language. Is this section also intended to support findings 2228.3 and 2228.3.1?

With respect to staff training, although this aspect is not addressed in the “Evidence” section above, we note that CRA policy #041 addresses professional development of academic staff and identifies



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Guiding Principles and implementation. It is attached as **Appendix D**. Topics presented on include RTI, PBIS, Special Education Compliance Requirements (inclusive of IEP goal data tracking, compliance checklists, and IEP service page recommendations), UBD Lesson Planning, CPI - Non-Violent Crisis Prevention & Intervention, Trauma informed practices, responsive classroom techniques, Appreciative Inquiry approach to program evaluation and improvement, Crisis Co-regulation and Emotional First Aid. Current professional development supports were reviewed with the entirety of CRA faculty. Much of the staff preferred the current practice of individualized professional development plans inclusive of financial support for identified trainings. Copies of professional development training and faculty signatures of attendance can be provided upon request.

Our current staff training policy has been reviewed by Agency of Education on-site designees several times. This is the first report of concerns regarding training for “specific learning disability, emotional disturbance and other health impaired.” We have received no feedback relative to what would be a preferred substitute training model.

In addition to the formalized trainings described above, additional opportunities for training/learning are provided as follows:

1. At least one daily meeting per week is dedicated to discussing students for whom we have concerns with input from our clinical staff, including master’s level clinicians and a BCBA.
2. In our new schedule, special educators now have large blocks of time to discuss students, plan and monitor plans.

2228.3 - CRA demonstrated that they have 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. It is recommended that CRA add a special educator to the admissions committee to ensure that student needs can be met.

A special educator had been added to the admissions committee.

2228.3.1 - CRA did not meet expectations for maintenance of (1) educational records, and coordination with LEA and parents (2) participation in evaluation and IEP procedures (3) implementation of IEPs

Although we are not entirely clear on this, we assume that the “Evidence” section quoted above with respect to 2228.1 is also applicable to this finding.

Our efforts regarding this concern date back to December 2014 and initially were supported through three main initiatives: (1) reorganization of staffing patterns to include a new leadership model and an increase in our special education staff.); (2) the development of a special education Weekly Compliance Program, specific to caseloads for our Special Education Case managers.; (3) a new staffing pattern,



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which provides a teaching team for each educational group that includes a Teacher, Special Educator, and Behavioral Support faculty member. The new staffing pattern was designed to promote special education service delivery by placing a special educator in each classroom. In cases where applicable through the IEP, communication and coordination is supported through identified Academic Case Managers on each team to support smaller case management caseloads. Academic Case Managers are experienced in alternative settings and provide communication/coordination under the supervision of the identified Special Educator. This co-teaching model was implemented on January 19, 2015.

To further illustrate our coordination and IEP implementation, all student IEP's are assessed to determine what services are needed for each student given the uniqueness of our program. This effort requires considerable communication and coordination with LEAs and IEP teams, as changes in service cannot occur without the support of all team members.

Since the implementation of these systems, two AOE special education on-sites were conducted (11/9/2015 and 5/13/2016) with verbal feedback relaying that there were no required corrective action items expected.

Documentation of these services has admittedly been a challenge we recognize, and, as noted above, we have strengthened leadership, are continuing to improve our systems as evidenced by new policies regarding Special Education Compliance, including an updated Weekly Compliance Form, and by our retention of additional experienced special educators. Moving forward, systems have been streamlined under our special educators, who are now directly responsible for the maintenance of special education files including meeting minutes/attendance and ongoing service delivery compliance, evidence of which must be kept in the special education files.

2228.3.2 –CRA meets expectations regarding licensed staff. Licensed staff were reviewed, with questions around high turnover and license status for Special Education Teachers.

We are pleased to observe that the Committee Report described our staff as “engaging, knowledgeable, cooperative and professional,” and that they were reported to have established a “positive and collaborative working relationship with Local Educational Agencies (LEAs) to support the student’s educational programs.”

We note that, given the nature of the population we serve and other factors, including personal and performance considerations and the fact that CRA is a year-round school, staff turnover is necessarily a challenge on an ongoing basis. Additionally, there is a critical shortage of certified special educators in both VT and NH, with numerous openings in surrounding districts moving into the 2017-2018 school year, including, White River (2), Orange East – Bradford (2), Danville (1), St. Johnsbury (2), and Newport (5). Finding special educators with both the skills and passion for working with this population has been and likely will continue to be a challenge. However, through increased pay and other strategies (including offering housing options and out-of-state recruiting), we have taken steps to enhance our



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ability to attract and retain staff. We have seen initial success and now have three experienced special educators on staff.

In addition, CRA's academic schedule and staffing model has been substantially modified for the 2017-2018 academic year and continues to be assessed further. Much of the change was designed to reduce the high stress nature of the special educator role within our system. Our population places an extreme amount of stress on employees, and redefining the role of special educators was identified as a way to reduce burnout, supporting the retention of faculty in that role.

2228.4 –CRA did not follow policies, procedures and written agreement outline tuition and establish division of legal responsibilities with regards to students on IEPs.

It has been CRA's understanding of the regulatory structure, as noted below, and our consistent practice, only to enter into annual LEA contracts for day students. We understood our contractual relationship with respect to residential students to be with the AOE. Apparently, this understanding was incorrect. Based upon this finding in the Report, we have already modified our practice to obtain such agreements for all students. A copy of the standard agreement we are using prospectively is attached as **Appendix E**. Accordingly, this issue has been corrected.

With respect to our coordination with LEAs, we know that we sometimes have had challenges with this in the past and acknowledge our part in it. We do note that this collaboration is a "two-way street," which involves both CRA and the LEA, and that there are documented instances in which we did not receive timely responses nor updated IEPs from LEAs. We are making efforts to be more proactive in reaching out to LEAs well before IEPs are due, as well as making sure that we are invited to meetings and that we consistently are mindful of building relationships with our sending schools.

In conclusion, while we acknowledge that there have been documentation errors in the past and that we have struggled to expand our special education staff until our recent successful efforts, we believe we have rectified these shortcomings. We have continuously demonstrated responsiveness to feedback as we strive to provide the very best education for our students, and we believe we have and are making great strides. We also believe that the prior history of our interactions with the Agency is important in that it reflects that this report was the first real notice of the Agency's views on a number of the issues discussed above, after several years without a formal site visit with written findings. Accordingly, we would appreciate an opportunity to remediate the cited inadequacies with the guidance, support, and oversight of the Agency. Accordingly, we request that the Secretary decline to withdraw our approval for the provision of special education services, thereby closing precipitously this important educational resource for our students.

Appendix A

Amos Kornfeld
66 Upper Turnpike Rd
Norwich, VT 05055
(802) 299-0110 AmosKornfeld@gmail.com

PROFESSIONAL PROFILE

- Passionate educator with years of experience helping students succeed.
- Skilled and knowledgeable special educator with experience serving a broad range of learners in a wide variety of environments.
- Initiated new programs to enhance student learning.
- Collaborative teacher and leader with experience participating in, and creating, highly effective teams.
- Highly effective written and verbal communication skills.
- Successful fundraiser and grant writer.

Consultant, National Center for Special Education in Charter Schools, 2016-

- Consult with over 40 public schools in MA in order to provide a high quality education for students with disabilities and English Learners.

Outreach Coordinator & Instructor, Stern Center, West Lebanon, NH, 2016-

- Responsible for managing Upper Valley Campus, overseeing professional development, marketing, instructing, and staffing.

Head of School, Centro de Educación Creativa, Costa Rica 2015-2016

- Oversaw operations of a bilingual elementary and high school with 100 acres of forests, trails and gardens.
- Supervised staff of fifty professionals.
- Developed new partner schools and organizations.
- Led development and fundraising efforts.

Principal, Ottauquechee School, Hartford, VT 2008-2015

- Pre-k through 5th grade school. supervised staff of fifty professionals.
- Responsible for developing and managing annual budget and strategic planning.
- Oversaw special education, developed new and innovative programs to meet the need of all learners and frequently served as LEA.
- Developed programs to meet the needs of a diverse student body including: award winning PBIS program, Wolf Den, Responsive Classroom, and Enrichment programs.
- Organized professional development activities on topics that include: Responsive Classroom, PBIS, Social Thinking, Trails to Every Classroom, and inquiry based science.
- Expanded opportunities by obtaining grants for a school vegetable garden, a naturalist in residence program with Vermont Institute of Natural Science, outdoor skills and hiking with the Appalachian Trail Conservancy, and student leadership and community service projects.

Principal, Tunbridge Central School, Tunbridge, VT 2003-2008

Principal, Piermont Village School, Piermont, NH 1999-2002

Camp Director, Hay Days, Hanover, NH 1993-1999

Teacher, Lyme School, Lyme, NH 1987-1998

Camp Director, Upper Valley Special Needs Center, 1987-1989

Special Educator, Oxbow High School, Bradford, VT 1985-1987

EDUCATION

Ed. D. Leadership and Policy Studies, University of Vermont

M.A. Dartmouth College

B.S. University of Michigan

Certifications

Vermont and New Hampshire Principal and Superintendent licenses, VT special educator license pending

AWARDS/SCHOLARSHIPS

Dartmouth College- Rassias Institute: Spanish

Fulbright Exchange-Argentina

Fulbright Exchange- Uruguay

Vermont Asian Studies Program- China Education Leadership Exchange

LANGUAGES

Spanish- fluent

VOLUNTEER SERVICE

Vermont Institute of Natural Science advisory board/education committee

Valley Court Diversion panel member

Listen Community Services

Appalachian Trail maintainer

Upper Valley Trail Alliance

Norwich Trails Committee

Foster Parent Casey Family Services, Vermont DCYF

Bugbee Senior Center

Ledyard Charter School board member

Past President Thetford Youth Sports, Little league baseball and soccer coach Norwich Recreation

Past board member Second Growth: prevention and advocacy organization

Past board member Inspiring Kids



VERMONT PERMANENCY INITIATIVE
Connecticut River Academy

Policy Name: Special Education Services in compliance with Rule 2228.3.1

Policy #: 059

Date Created: September 2017

Purpose: To provide feedback towards strengthening the procedures and content surrounding compliance of Special Education Services at VPI-CRA based on feedback provided by the Agency of Education.

Regulation requirements for this document are prescribed in rule 2228.3.1: *An independent school shall coordinate with sending responsible agencies, parents, public agencies, and other service providers serving a student by: (1) Maintaining educational records and disclosing them to the sending responsible agency and the student's parents; (2) Participating in evaluation procedures and in the development of IEPs, including plans for reintegration and transition services; and (3) Implementing IEPs and will be referenced throughout this document, which will also include detailed explanation of procedure within each domain.*

Coordination of services is defined as the ongoing collaboration between the Local Education Agency (LEA), parents, public agencies such as designated mental health centers, and other service providers serving the student such as private doctors and private mental health providers through ongoing verbal and written communication as identified through the intake process (please refer to Academic Policy # 60).

The Individual Education Plan (IEP) is a team driven, legal document that defines a child's special education program. It includes the disability under which the child qualifies for special education services, the services the team has determined the school will provide, the students' yearly goals and objectives and any accommodations that must be made to assist the students' learning. The purpose of the IEP is to guide teachers, parents, school administrators, related services personnel, and students (when appropriate) to work together to improve educational results for children with disabilities. The IEP is the cornerstone of a quality education for each student with a disability, based on strengths and measurable goals and objectives.



VERMONT PERMANENCY INITIATIVE
Connecticut River Academy

Policy Name: Special Education Services in compliance with Rule 2228.3.1

Policy #: 059

Date Created: September 2017

Initial Review of IEP document:

- Referral IEP
 - Prior to intake of a new student, the Academic Coordination Team (ACT), which is comprised of classroom special educators, Head of School and Clinical Director, reviews the students current IEP (or other academic support plans such as 504, etc) to gather feedback regarding appropriateness of academic placement, review of services inclusive of potential recommendations and identify academic assignments from special educators directly involved the classroom.
 - If acceptance to the program is identified, conversations between the identified Academic Case Manager (ACM) from CRA and the LEA are initiated.
 - During the change of placement meeting, the IEP is reviewed, edited and completed with the student's IEP team.
 - See corresponding Academic Policy 060 for further intake processes and Academic Policy 061 regarding LEA agreements.

2228.3.1 (1): Maintenance of Educational Records

- Changes and updates to the IEP shall be made based on needs identified by the IEP team, areas of continued academic need, achievement of goals or objectives, and effectiveness of interventions, in accordance with the requirements set forth through The Individuals with Disabilities Education Act (IDEA).
- It is the responsibility of the assigned Academic Case Manager to ensure maintenance of student Special Education records to include: current IEP, special education evaluation reports, evidence of ongoing communication with IEP team members, Individual Crisis Management Plans inclusive of specific behavior plans, quarterly special education progress notes and evidence of student progress towards identified goals.
 - Following the placement meeting, CRA will receive from the LEA an updated



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Policy Name: Special Education Services in compliance with Rule 2228.3.1

Policy #: 059

Date Created: September 2017

- IEP as well as a current special education evaluation report.
 - In the event that an updated IEP and special education evaluation report is not received, the Academic Case Manager will document and file attempts to retrieve the documentation from the LEA.
 - If an updated IEP and special education evaluation report is not received within 20 days of placement, the ACM will notify the Head of School. The Head of school will make attempts at retrieving the IEP from the District Director of Special Education and provide documentation of attempts.
 - In the event that an updated IEP and special education evaluation report is not received within 30 days, the Head of School will notify the Agency of Education (AOE).
- The academic case manager will obtain the students Individual Crisis Management Plan (ICMP) inclusive of specific behavior plans and the Individual Treatment Plan from the identified clinician.
 - The Academic Case Manager is responsible for completing the education section of the ITP and monthly reports, reporting on progress towards academic goals
 - The Academic Interventionist is responsible for completing the independent living section of the ITP and monthly reports, reporting on progress towards identified goals in this area.
 - See corresponding Clinical Policy # 0015
- The Academic Case Manager will complete quarterly special education progress reports communicating progress towards identified goals. Reports are submitted to the Academic Administrative Assistant to be mailed along with quarterly report cards to previously identified IEP team members (current release of information documentation must be present). Copies of Progress reports will be placed in students IEP file and an electronic copy kept on CRA's secure server.
- Special Educators will provide evidence of student progress towards identified goals



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Connecticut River Academy

Policy Name: Special Education Services in compliance with Rule 2228.3.1

Policy #: 059

Date Created: September 2017

monthly.

- See corresponding Academic Policy 024

2228.3.1 (2): Participating in evaluation procedures and in the development of IEPs, including plans for reintegration and transition services.

- CRA supports evaluation of student through formal/informal assessments and classroom observation on an ongoing basis to assess progress and needs in the following domains as identified in the students IEP: academic, special education, behavioral, independent living skills and clinical.
 - Academic assessments may include:
 - Formal: Mobymax, tests quizzes as appropriate
 - Informal: class work completion and verbal assessment as to content learned through access to the general education curriculum
 - Special Education assessments may include:
 - Formal: Mobymax, completion of IEP evaluation assessments as determined by the LEA
 - Informal; IEP progress monitoring
 - Behavioral assessments may include:
 - Formal: CBCL, Functional Behavioral Assessments
 - Informal: qualitative review of behavioral data inclusive of Incident reports and physical management reports, progress reports on identified goals
 - Independent Living Assessments may include:
 - Formal: Casey Life Skills Assessment, needs assessment, career assessment.
 - Informal: progress reports on identified goals, the adult living preparation form, post care plan and packet, NYTD check list
 - Clinical assessments may include:
 - Formal: Initial Clinical Assessment, Psychosocial, CANS, SEARS,



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Connecticut River Academy

Policy Name: Special Education Services in compliance with Rule 2228.3.1

Policy #: 059

Date Created: September 2017

- BERS
 - Informal: qualitative review of behavioral data inclusive of Incident reports and physical management reports, progress reports on identified goals
- Reintegration and transition services are documented in two ways: (1) Through the reintegration and transition section of student ITP's and (2) through the Independent Living skills domain of the students ITP. Please see corresponding Clinical Policy 0017: Completing Adult Living Preparation. In addition, CRA participates in transition planning meetings upon identified discharge from our program to coordinate transitional services and make recommendations.
- Please see corresponding Academic Policy 003

2228.3.1 (3): Implementation of IEPs

- Special Educators are responsible for the service delivery of specialized instruction in their assigned classroom (Humanities, STEM, Social Emotional Learning) as identified through the students IEP.
- Coordination of other associated services are the responsibility of the students' Academic Case Manager (clinical services such as psychotherapy, speech and language services, etc)
- Implementation Quality Assurance:
 - Compliance assurance is provided through documentation of services delivered on a weekly basis through a weekly compliance checklist with signatures obtained by internal service providers. External service providers such as Speech and language Pathologists are required to maintain their own records and provide documentation as requested.
 - Services identified on the Weekly Compliance Checklist is derived from the IEP service page in accordance with the LEA Contract for Educational Services agreement and reflective of services that are the responsibility of CRA, VPI-North. Services should be detailed to include specific identified service (and



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associated goal), delivered by whom, mode of delivery (small group vs 1 on 1), how often.

- Daily indication of whether the service was provided should be documented utilizing the key at the bottom of the page. Blanks are not an acceptable form of documentation. If the service was not provided, please add additional note with explanation.
- Service providers must sign the weekly compliance form attesting that services were provided as indicated.
- Maintenance of this document is the responsibility of the Academic Case Manager

Appendix B
CRA Special Education Weekly Compliance Report Form
 Academic Case Manager: | Head of School: Amos Kornfeld | CRA

Name of Student

Y = Service Provided | V = Vocational, service undeliverable | X = School Closed | S = Student Unavailable, Service not provided | T = Teacher Unavailable, service not provided | N= Not Scheduled

Attestation

By signing below, I attest that, the identified services have been provided as described and that the below information is true and correct. I understand that additional information may be requested to substantiate the services provided.

Dates:

What	By Whom	Group	How Often?	M	T	W	T	F	Notes	Signature of provider

Head of School Signature: _____ Date Reviewed: _____
 Printed Name: _____

Y = Service Provided | V = Vocational, service undeliverable | X = School Closed | N= Not Scheduled
 S = Student Unavailable, Service not provided | T = Teacher Unavailable, service not provided



**VERMONT PERMANENCY INITIATIVE
Connecticut River Academy**

Policy Name: EDUCATION RECORDS

Policy #: 024

Date Created: November, 2013, September 2017

Policy

Connecticut River Academy (CRA) recognizes the importance of keeping accurate and appropriate education records¹ for students as part of a sound educational program and is committed to act as trustee of this information, maintaining these records for educational purposes to serve the best interests of its students.

The principles of accuracy and confidentiality underlie all policies and procedures for the collection, maintenance, disclosure and destruction of education records. It is the policy of the district to protect the confidentiality of education records and release information only as permitted by law. Annually or when the student enrolls, the district will inform parents, guardians, and students eighteen years and older of their right to inspect, review, and seek amendment of the student's education records. The school will inform parents, guardians, and students eighteen years and older of items considered directory information through notices distributed at the beginning of each school year or when a student enrolls.

The building principal or head of school will be the custodian of all education records in a given school and assume overall responsibility for assuring that adequate systems are in place to maintain such records and to provide parents with access to them in accordance with state and federal law. The Head of School is responsible for developing procedures to assure the consistent implementation of this policy. The procedures shall comply with all federal and state laws and regulations governing access to and the collection, maintenance, disclosure and destruction of education records.

Definitions

All terms used in this policy, and the procedures developed for the implementation of this policy, shall be defined, where applicable, as those terms are defined in the Family Educational Rights and Privacy Act and in the federal regulations promulgated pursuant to that Act.

Rachel Wood

817-600-6590

rachelrenee732@gmail.com

Education

University of Texas at Arlington
BA in English Teaching

Completed
May 2012

Western Governors University
Graduate Coursework in Instructional Design and Technology

In Progress

Professional Experience

Harmony School of Innovation
Fort Worth, Texas

August 2013—April 2016

MS Classroom Teacher; Special Education and 504
Coordinator

- Fulfilling Federal, State, and Local Program Requirements
- Facilitating Professional Development

SMIC Private School
Pudong, Shanghai, China

July of 2013

Summer ESL Teacher

- Creating and Implementing English as a Second Language Curriculum

Nimitz High School
Irving, Texas

August 2012—June 2013

HS Classroom Teacher

- Employing a Variety of Educational Technology
- Maintaining Organized Digital and Physical Spaces

A&T Moore Healthcare
Arlington, Texas

March—August 2012

- Developing Office Workflow and Procedures
- Networking Computers and Devices
- Creating and Maintaining a Professional Website

Cancer Research Foundation of North Texas
Arlington, Texas

June 2008—March 2012

- Coordinating Fundraising and Educational Symposiums and Events
- Editing for Grammar, Mechanics, and Semantics

Charles R. Reed Jr.

18 Harrisland Dr.

(828) 279-1732

Asheville, NC 28806

chareed@live.com

Education:

1993-1997 Bachelor of Arts, English/Journalism, St. Michael's College

2011-2012 Alternative Licensure Program, Special Education, Western Carolina University

Currently: Aug. 2013- June 2017 Middle School EC teacher (licensed Special Education-General Curriculum) working with Buncombe County Schools day Treatment program. The BCS Day Treatment program is a therapeutic and academic classroom environment for students in 6th, 7th, and 8th grades that have mental health diagnoses that impede social/emotional growth and academic progress.

Applicable Employment History:

Sept. 2012 - Aug. 2013 Middle School Teacher, Stone Mountain School

Taught 6th, 7th, and 8th grade students in a therapeutic and academic environment designed to help support awareness of positive (and negative) behaviors and to help support numerous interventions and skills practice to encourage pro-social and pro-academic behaviors.

July 2012 - Dec. 2017 - Teacher, Young Adult Program at Jubilee Church!

March 2002- June 2017- Teacher, Turtle Island Preserve

March 2004- November 2006- Assistant Program Director, Turtle Island Preserve

Teach visiting school/community groups primitive skills, natural living skills, and nature based activities in an experiential model to inspire hands-on contact with the natural world, confidence in being able to do-it-yourself, and a more benevolent lifestyle on our planet.

July 2002- October 2003 - Head Instructor, SUWS of the Carolinas

November 2006- October 2007- Head Instructor, Phoenix Outdoor

Led groups of 14-17 year old students on weeklong backpacking trips using therapeutic tools and models for assessing students' future placement. Taught primitive skills as metaphors for problem solving, confidence building, and as an assessment tool. Used the natural world and

hiking to provide space and time for perspective, emotional release, and to heal relationships with family.

Appendix C

THOMAS JOHN ELVERSON
506 Ogden Avenue
Swarthmore, Pennsylvania 19081
610-986-3267 (cell)

- SWARTHMORE COLLEGE, Swarthmore, PA** 2004-2013
Alcohol Intervention and Education Specialist
Fraternity Mentor and Advisor
- Counseled Students that presented with alcohol and substnace issues
 - Liason to locall police department and district court
 - Specific work in Development Office with notable alumni
 - Advised leadership and brotherhood of the fraternities
- SWARTHMORE COLLEGE, Swarthmore, PA** 1986-1993
Assistant Visiting Professor, Education Department
- WALLINGFORD-SWARTHMORE SCHOOL DISTRICT, Wallingford, PA** 1980-1999
- Faculty Chair and Co-Chair; Wallingford Elementary School and Swarthmore-Rutledge School
 - Special Education Teacher, Learning Disabilities
 - Counsel of Psychologist
 - Crisis Intervention Team Leader (County)
- NANTUCKET COUNSELING SERVICE** 1990-1997
Clinician, Consultant, Evaluative Process (Summers)
- Marriage Counseling
 - Drug & Alcohol Counseling
 - Adolescent Counseling
 - Children Counseling
 - Family and Sexual Issues
 - Crisis Intervention
- SWARTHMORE BOROUGH COUNCIL, Swarthmore, PA** 1987-1994
- President (1994 [Jan.])
 - Vice President
 - Chairman, Parks and Recreation
 - Chairman, Public Safety Committee
 - Member, Finance Committee
- SWARTHMORE BOROUGH DRUG AND ALCOHOL COMMUNITY COMMITTEE** 1991-1995
Member
- PRIVATE MEDIATOR**
- Political
 - Labor
 - Educational
- PRIVATE CLINICIAN** 1984-Present
- Volunteer in New York City following "911" as Crisis Intervention Worker
 - Psychological Services
 - Marriage Counseling
 - Adolescent Counseling
 - Crisis Intervention
 - Court Psychological Evaluations
- BENCHMARK SCHOOL, Media, PA** 1975-1980
- Math Specialist
 - Language Arts Teacher
- CANDIDATE FOR STATE REPRESENTATIVE** 1992 State Election
State of Pennsylvania (161st District)

EDUCATION

UNIVERSITY OF PENNSYLVANIA, Philadelphia, PA
Ph.D. Program in Counseling Psychology

VILLANOVA UNIVERSITY, Villanova, PA
Master's of Counseling-Psychology, 1984

STATE OF PENNSYLVANIA
Master's Equivalency, Special Education Concentration, 1982

SWARTHMORE COLLEGE, Swarthmore, PA
B.A. English Literature, 1975

INTERCOLLEGIATE ATHLETE (4 Years)

- Basketball
- Track and Field

AWARDS

- Outstanding Educator of the Year, Wallingford-Swarthmore School District, 1995-96
- Multiple-Sclerosis Volunteer of the Year, Pennsylvania, 1997

SEMINARS & WORKSHOPS

Conference of the Brain, Boston, MA, Fall 2003.

Presenter, Shipley School, Experiences from "911," Spring, 2001.

Presenter, Lower Merion School District, Experiences from "911," Fall, 2001.

Presenter, Wallingford-Swarthmore School District, Crisis Intervention, Spring, 2000.

Presenter, Wallingford-Swarthmore School District, Stress Disorders in Children, Spring 1999.

Presenter, LaSalle University, Crisis Intervention and Mediation, Winter 1998 and 1999.

Presenter, Wallingford-Swarthmore School District, Crisis Intervention, Fall 1995, 1996, 1997, 1998.

Presenter, Swarthmore College, Course on Urban Education, Spring 1994.

Presenter, Swarthmore College, Course on Counseling, Spring and Fall, 1993.

Delaware County Intermediate Unit Workshop, "Post traumatic Stress Disorders in Children," Winter 1991.

Presenter, Swarthmore Friends School, "Current Stress Disorders in Children," Spring 1991.

Presenter, Swarthmore College, Course on "Current Educational Topics," Spring 1987.

Presenter, Wallingford-Swarthmore Workshop on Counseling and Special Education Issues, Spring 1984.

Presenter, Wallingford-Swarthmore Workshop on Special-Education Issues, Fall 1983.

Delaware County Intermediate Unit, Workshop, "Stress in Special Education," 1983.

Association for Children with Learning Disabilities (PCACLD), Philadelphia Chapter Convention, 1978.

Association for Children with Learning Disabilities (ACLD), National Convention, 1977.

EDUCATIONAL CERTIFICATIONS

English Literature: Secondary • Special Education: Kindergarten-12 grade Elementary Counseling

REFERENCES AVAILABLE UPON REQUEST

Appendix D



VERMONT PERMANENCY INITIATIVE Connecticut River Academy

Policy Name: Professional Development

Policy #: 041

Date Created: August 2005, updated January 2014

It is the policy of Connecticut River Academy (CRA) to support the connection between educator professional development and improved student achievement and to assure that professional and paraprofessional faculty members broaden their knowledge and skills in order to contribute effectively to the achievement of the goals and strategies articulated by each school's action plan.

Principles to Guide Professional Development

School priorities for professional development will be directly linked to student performance goals. Professional development that increases educators' knowledge of content, pedagogy, and creating effective learning environments will ultimately contribute to enhanced student performance.

CRA will develop a professional development system that is characterized as follows:

1. Its primary focus is on improved student learning and achievement.
2. It is based on current, documented research findings.
3. It provides structure and substance that allow continuity.
4. It focuses on content and curricular needs as well as teaching methodology.
5. It includes the needs of all who contribute to the education system.
6. It is developed and directed by professional educators.
7. It allows for effective supervision and feedback by administrators to ensure implementation of professional development outcomes.

Implementation

The Head of School or designee will develop a process to analyze student performance data, best-practices research, state and local standards compliance; all of which provide input to the creation of annual and multi-year professional development programs.



VERMONT PERMANENCY INITIATIVE Connecticut River Academy

Policy Name: Professional Development

Policy #: 041

Date Created: August 2005, updated January 2014

A professional development committee composed of teachers and administrators will recommend a professional development plan that will contribute to the accomplishment of CRA's priorities.

After consultation with the professional development and action planning committees, the Head of School will recommend to the Director of Operations a needs-based professional development plan and yearly calendar. The Head of School or designee will make recommendations to ensure adequate financial resources and time for educators to participate in appropriate professional development experiences.

The Head of School or designee will:

1. Coordinate professional development activities with CRA goals;
2. Provide adequate opportunities to prepare educators to utilize assessment data for the purpose of increasing student achievement and to improve the overall effectiveness of the curriculum.
3. For new teachers, implement a system of mentoring for professional staff during the first two years of employment.

The Head of School will report annually to the Director of Operations the effectiveness of staff professional development and the relationship to the student achievement goals identified within the annual action plan.

The Director of Operation will place high priority on provisions that will support CRA's professional development system.



VERMONT PERMANENCY INITIATIVE
Connecticut River Academy

Policy Name: Professional Development

Policy #: 041

Date Created: August 2005, updated January 2014

Legal References:

20 U.S.C. §§1400 et seq. (IDEA)

1 V.S.A. §§ 312 (Open Meeting Law)

16 V.S.A. §164(9) (State Comprehensive Assessment)

16 V.S.A. § 165 (a)(2) (Public School Quality Standards)

Vermont State Board of Education Rules §§2120.2.1, 2120.2.2

Vermont Framework of Standards and Learning Opportunities



VERMONT PERMANENCY INITIATIVE
Connecticut River Academy

Policy Name: LEA Contract for Educational Services Agreement

Policy #: 061

Date Created: October 2017

Purpose: To ensure proper procedures are followed resulting in clear agreements surrounding responsibilities for Special Education Services between CRA and LEA's

Pursuant to AOE section 2228.4, the agreement attached hereto as Exhibit A, shall be sent to LEA upon acceptance to CRA by CRA's Academic Administrative Assistant. A copy of the signed agreement should be maintained in the students' IEP file. In event signed agreement is not returned within 10 days, a reminder letter should be forwarded to the LEA with a copy placed in the file.

Appendix E

Exhibit A

CONTRACT FOR EDUCATIONAL SERVICES

1. **Parties.** This is a contract for educational services between Vermont Permanency Initiative, Inc. dba Connecticut River Academy (hereinafter called CRA) and XXXXXXXX (hereinafter called the LEA).
2. **Subject Matter.** The subject matter of this contract is educational services on the subject of general and special education, related services, crisis, and clinical support. Detailed services to be provided for XXXXXXXX (hereinafter, "Student") by the CRA are described in Attachments A - C.
3. **Tuition and Costs.** In consideration of the services to be performed by CRA, the LEA agrees to pay the CRA tuition and costs in accordance with the payment provisions specified in Attachment C.
4. **Contract Term.** The period of CRA's performance shall begin on XXXXXXXXX and end on June 30, 2018 unless earlier terminated in accordance with Section 6, below, or Attachment C.
5. **Amendment.** No changes, modifications, or amendments in the terms and conditions of this contract shall be effective unless reduced to writing, numbered, and signed by the duly authorized representatives of the CRA and LEA.
6. **Cancellation.** This contract shall be automatically terminate if and when the Student is no longer enrolled at CRA. In addition, either party may cancel this contract upon 30 days written notice to the other party.
7. **Entire Agreement.** This Contract, together with its Attachments A – D, represents the entire agreement between the parties on this subject matter. All prior agreements, representations, statements, negotiations, and understandings are superseded and replaced by this Contract and shall otherwise have no effect.
8. **Applicable Law.** This Contract will be governed by the laws of the State of Vermont.
9. **Waiver, Release and Indemnification.** The LEA acknowledges and agrees that the responsibility for compliance with special education and other procedural requirements (hereinafter "LEA special education obligations") rests with the LEA and that the LEA agrees to hold CRA harmless should the parents or guardian of Student, or Student, initiate a due process proceeding or other legal action or administrative complaint based on or arising out of the LEA's negligent and/or intentional failure to fulfill its LEA special education obligations. The LEA further agrees in such cases to reimburse the CRA for any and all reasonable expenses, including attorneys' fees, incurred by CRA or its principals, employees and educational contractors, as a result of a due process hearing and appeal or other legal action or administrative complaint initiated by the parents or guardian of

Student or by Student, e.g., Section 504 Complaint, Complaint to the Secretary of the Agency of Education, based on or arising out of the services described in this Contract, except CRA shall have no entitlement to reimbursement from the LEA for such reasonable expenses in any instance in which CRA (or CRA personnel) is assigned to implement services in the Students' IEP as the Special Education or Related Services Provider, and it has been determined in any such proceeding (initiated by the parents or Guardian of the student, or CRA Student) that Student's procedural rights or rights to a FAPE were violated by virtue of CRA's negligent provision of the specified special education service or related service written into the Student's IEP. The parties hereby acknowledge and agree that any such reimbursement shall be considered to be agreed-upon extraordinary costs to be paid to CRA by the LEA in accordance with Attachment C.

- 10. **Parties' Relationship.** CRA is a contractor and is not an agent, employee or legal representative of LEA.
- 11. **Intellectual Property.** Nothing contained herein shall be deemed to grant LEA any ownership, license or other interest or rights in any of CRA's Intellectual Property, including but not limited to its copyrights, trademarks, trade secrets, trade names, corporate slogans, goodwill, program designs and other confidential and/or proprietary information.
- 12. **Attachments.** This Contract includes the following Attachments:
 - Attachment A – Program Description and Provisions
 - Attachment B -- Agreement as to Non-Instructional Services
 - Attachment C – Cost Agreement
 - Attachment D – Calendar

WE THE UNDERSIGNED PARTIES AGREE TO BE BOUND BY THIS CONTRACT.

CRA

LEA

Date: _____

Date: _____

Signature: _____

Signature: _____

Name:

Name:

Title:

Title:

Program Description and Provisions

Program Description

Connecticut River Academy (CRA) is an independent school approved for general and special education by the State of Vermont for students aged 6 – 22. Students are placed by their responsible Local Educational Agency (LEA). Student programs are developed and guided by the appropriate educational plan, typically an IEP.

The CRA program provides students with highly individualized programs with intensive instructional/behavioral support and supervision throughout their educational day. Services are provided by qualified teachers, special educators, related services professionals and student supervisors. CRA's program is informed through the use of data, assessment, and observation using a variety of frameworks, including the Vermont State Standards. The foundation of the program begins with the premise that all students must have a sense of safety and belonging in order to thrive and learn.

Connecticut River Academy is a year round school with classes offered from 8:15 – 3:15. The school calendar is attached as Attachment D. Students are expected to arrive not before 7:45 and to leave not after 2:45 unless other arrangements have been made through the IEP. Transportation is the responsibility of the LEA.

Specifications

In entering into this contract, Connecticut River Academy accepts some responsibility for protecting the due process rights of its students. The parties acknowledge and agree that the responsibility that procedural requirements have been met rests with the LEA. However, CRA acknowledges and agrees that it is also the responsibility of CRA to enable the LEA to meet its legal responsibilities. This Contract specifies the role that CRA plays in carrying out the procedural requirements as follows and as specified in Attachment B. CRA shall provide an appropriate education to the Student, as determined by the IEP Team and

- a) provide for attendance of appropriate CRA personnel to IEP meetings and such other meetings as may be required by the student's IEP;
- b) keep the District and Parent informed of the student's activities and progress and identify such adjustments and revisions to the IEP as may be beneficial to the student;
- c) make no substantial changes to the student's program without an IEP Team meeting wherein team members can express opinions and the Team can reach consensus;
- d) accommodate the educational program whenever possible and notify the LEA if an appropriate accommodation cannot be provided by the CRA;
- e) comply with all state and federal laws applicable to CRA with respect to the rights of students and persons with disabilities; and
- f) make its personnel available to consult and testify in the event of a due process hearing and appeal brought on behalf of the student.

Agreement as to Non-Instructional Services

This agreement is written because the Student has been placed in a residential program served by CRA and is eligible for special education services. The Student has a current IEP calling for services consistent with CRA services. If this is not the case, the LEA representative and the CRA will work together to update the IEP within 10 days of enrollment.

Evaluations – The LEA is responsible for initiating and completing all procedural requirements for comprehensive evaluations and any other evaluations, including writing reports. CRA has the capacity to assist with psycho-educational testing, vocational assessment and inventories, occupational therapy, and speech and language evaluations. Specialized evaluations by CRA may not be available. If CRA assists in the evaluation process, a written summary of the findings of CRA will be provided to the LEA within an agreed upon time frame. CRA will notify Student's IEP Team and the LEA about any identified need for re-evaluation.

I.E.P.s – The LEA is responsible for developing the IEP and for assuring annual reviews and other IEP meetings, and the completion of the state required IEP form. CRA will assist the LEA by participating in IEP meetings, providing timely reports of progress, proposed present levels of performance, goals and objectives, services, and will assist in the development of reintegration plans, transition plans, graduation and multi-year plans, when appropriate.

State Forms – The LEA will be responsible for the completion of state special education forms, but when agreed upon, CRA will assist the LEA by preparing requested paperwork on the state forms.

Medicaid Forms – As requested, CRA will complete the monthly documentation for personal care, case management, direct and related services.

State Testing – CRA will assist the LEA in administering state assessments, the development of student portfolios for alternative assessment and any other legally required assessment. Responsibility for such required assessments is the responsibility of the LEA.

Transportation – The LEA has the responsibility of coordinating transportation with the home provider or parent and arranging for such services. CRA will assist the LEA with transportation services as specifically agreed upon for Student.

OTHER:

CRA abides by the Family Education Rights and Privacy Act (FERPA) requirements for confidentiality and the maintenance of educational records.

CRA abides by the special education requirements regarding the destruction of educational records.

CRA will not expel Student unless the Evaluation and Planning Team has determined that the misbehavior is not related to Student's disability or there is an IEP which calls for a different placement. CRA, however, reserves its right to cancel this Contract by giving written notice in keeping with Section 6, above.

Cost Disclosure

Tuition rates vary based on a variety of factors. The first factor in determining rates is based on the referring entity/party.

Day Students

In the case of students who are not referred through state agencies, most notably day students, the tuition charged is a daily rate equal to \$216.17/day based on days of attendance. The tuition rate is approved by the Vermont Department of Education and is subject to periodic review and may change based upon approval from the Vermont DOE.

The rate includes the costs for a minimum course of study and for special education and some related services. Additional Costs to be charged by CRA to the LEA for services not included in the CRA tuition include:

- Transportation (when agreed upon by LEA and provided by CRA): to and from school mileage, billed at the federal rate monthly after the provision of the transportation when CRA has provided for the transportation by its staff.
- Additional Personal Care Services, in accordance with the IEP, at a rate of \$22/hr.
- Additional speech and language and occupational services for students with devices, at a negotiated rate.
- Extraordinary services as described in Student IEP:

Services to be provided to Student and paid for directly by LEA include at least the following:

- Specialized evaluations or consultations by individuals selected by the LEA.
- Assistive and augmentative evaluations and ongoing consultations.
- Physical Therapy

Payment:

Tuition: Tuition Invoices will be sent monthly by CRA to the LEA. Payment is due on receipt.

Additional Costs: Additional costs will be invoiced monthly.

Interest on Past Due Balances: A 12% (twelve percent) rate of interest per annum shall be charged on all past due balances.

State Agency Referred Clients:

In the case of state agency referred clients, the Agency of Education is generally responsible for payment.

East Haverhill Academy

In the case of students who attend CRA but reside in one of our out of state residential programs, most notably East Haverhill Academy in nearby NH, the rate charged will be \$134.62/day, which is billed on a 365 day basis based on the days of enrollment in the residential program.

Becket House at Newbury

In the case of state agency clients referred from the Becket House at Newbury in Newbury, Vermont, the academic rate is likewise based on 365 day billing but set separately by the Vermont Division or Rate-setting based on the Becket House at Newbury's status as a Vermont PNMI program. The current interim rate is \$84.30/ day enrolled at the Becket House at Newbury program. It is subject to ongoing and retroactive change as a result of the cost reporting and reconciliation process, and time study data as well. Additional Costs are as noted above and will be billed directly to the AOE or LEA, as agreed.



Dec. 15, 2017

Rebecca Holcombe
Secretary of Education,
Vermont Agency of Education
219 North Main Street, Suite 402
Barre, Vermont 05641

Amos Kornfeld Ed.D.
Head of School
Connecticut River Academy
P.O. Box 635
Bradford, VT 05033

Dear Secretary Holcombe and Dr. Kornfeld,

The Council of Independent Schools (CIS) was asked to provide a “written recommendation” to the Vermont Agency of Education, regarding the Review Committee's recommended denial of Connecticut River Academy's independent school approval in special education. Submitting a "written recommendation" to the AOE is a statutory obligation of CIS, per Vermont State Board of Education Rule 2222.7 ("Prior to recommending denial, revocation or suspension of approval the Commissioner shall obtain the written recommendation of the Council of Independent Schools.").

Three of the six current members of the Council of Independent Schools—Dexter Mahaffey, Head of School, Vermont Commons School, South Burlington, VT; Jamie Spector, Development / Human Resources Coordinator & Social Worker, Maplehill School and Community Farm, Plainfield, VT; and I as the Head of School at Thetford Academy in Thetford, VT—visited Connecticut River Academy on Friday, Dec. 1. Our role was *not* to re-evaluate CRA for independent school approval in special education, but rather to provide a "written recommendation" to the AOE concerning the Review Committee's findings.

During our visit, we were specifically concerned with verifying whether or not we could support the AOE's findings regarding Rule 2228.1 (“CRA did not demonstrate the policies, procedures and staff training to support students in the disability categories of: specific learning disability, emotional disturbance and other health impaired.”); 2228.3.1 (“CRA did not meet expectations for maintenance of (1) educational records, and coordination with LEA and parents (2) participation in evaluation and IEP procedures (3) implementation of IEPs”); and 2228.4 (“CRA did not follow

policies, procedures and written agreement outline tuition and establish division of legal responsibilities with regards to students on IEPs” [sic]).

To verify compliance, we examined the IEPs of every student of record, we verified IEPs against student and faculty schedules and weekly compliance report forms, we interviewed CRA administrators and special education faculty members, we confirmed training and professional development programs and schedules, we inspected financial and billing processes, and we analyzed CRA policies.

We recognize that the Agency of Education visited CRA on May 12, 2017, and June 29, 2017, and that our visit occurred more than five months later (Dec. 1, 2017). While we saw a great deal of evidence that CRA has made strong efforts to address AOE concerns from those two visits, we cannot recreate precisely what the AOE assessed. Therefore, our recommendations pertain to CRA as it exists now.

Our recommendations are as follows:

Rule 2228.1 (AOE’s findings: “CRA did not demonstrate the policies, procedures and staff training to support students in the disability categories of: specific learning disability, emotional disturbance and other health impaired.”)

We find that CRA **does** demonstrate the policies, procedures and staff training to support students in the disability categories of specific learning disability, emotional disturbance and other health impaired. We note below some areas we recommend CRA improve on in this area.

2228.3.1 (AOE’s findings: “CRA did not meet expectations for maintenance of (1) educational records, and coordination with LEA and parents (2) participation in evaluation and IEP procedures (3) implementation of IEPs”)

We find that CRA **does** meet expectations for maintenance of (1) educational records, and coordination with LEA and parents, (2) participation in evaluation and IEP procedures, and (3) implementation of IEPs”). Again, we note some areas for which we recommend continued improvement, below.

2228.4 (AOE’s findings: “CRA did not follow policies, procedures and written agreement outline tuition and establish division of legal responsibilities with regards to students on IEPs” [sic]).

We find that CRA **does** follow policies, procedures, and written agreements concerning tuition and meets its legal obligations to students on IEPs. Once again, we noted several areas in which improvement should be made.



Our work revealed the following observations and recommendations:

In our examination of IEPs, we checked specifically for consistency between the requirements outlined on the service page, the daily schedule of the IEP student, and the weekly compliance report form for that student.

In some notable cases, we were concerned that there was not sufficient evidence that the IEP requirements were being met. However, when we interviewed the special education faculty member assigned to the students, we were shown daily compliance report records (one page per day) with abundant proof that the service page requirements were in fact being met.

One area of concern was our observation that every student has an IEP that is written by a different case manager and/or different LEA, representing different districts and different systems and utilizing different terminology, time tracking systems, and degrees of specificity for each student.

As currently written, the IEPs are written so variously that it is very difficult for CRA to group students together for various classes and meet the exact specifications of every IEP. For CRA—or any school—to satisfy the specificities of each IEP as currently written is quite difficult without providing 1:1 student to special education faculty member services.

We recommend that before or immediately after a student enrolls at CRA, the school should convene the student's IEP team or at least hold a Placement Meeting in order to write a service page that reflects the daily schedule and educational practices of CRA.

It is clear that training, as it is now practiced, is in good order and meets expectations. We have thorough documentation of CRA's annual training program, and we also concur with the AOE's finding on 2228.3.2 that CRA meets expectations regarding licensed staff.

We concur with the AOE that staff turnover in the past has resulted in accountability / paperwork challenges. The current administration and faculty is aware of this issue and is clearly committed to CRA's long-term health and viability.

We have completed an assessment and have a detailed record of all Vermont students attending CRA. With the exception of two students who are coming through St. Johnsbury (for whom contracts and payment are in order, but due to a filing issue on St. Johnsbury's side, are missing a final signature), all contracts are in good order. We found strong evidence that CRA meets 2228.4.

As noted, we are unable to verify CRA's compliance with AOE rules as things stood in June 2017; however, we found ample evidence that CRA is in compliance now, in December 2017. We therefore recommend that the AOE **conditionally approve CRA for all special education**



services, similarly to the Peter B. Gilmore recommendation on conditional general education approval as spelled out in the March 14, 2017 Independent Education Review. We recommend that the special education approval be conditional upon CRA addressing the concerns we have noted above, and that there be a timeframe of at least 12 calendar months prior to AOE review for reconsideration of the conditional status.

Sincerely,



William Bugg
Head of School
Thetford Academy
Thetford, VT 05074
[802-785-4805, ext. 211](tel:802-785-4805)

cc: Mark Tashjian, Chair, Council of Independent Schools
Molly Bachman, General Council, Vermont Agency of Education
Dexter Mahaffey, Head of School, Vermont Commons School
Jamie Spector, Development / Human Resources Coordinator, Maplehill School and
Community Farm
Catherine Beaton, Connecticut River Academy

