

AGENCY OF EDUCATION  
Barre, Vermont

**TEAM:** School Finance

**ITEM:** Will the State Board of Education grant renewal of general and special education independent school approval, to serve a maximum of 35 female students ages 13-20, within the disability categories of Emotional Disturbance, Intellectual Disability, Multiple Disabilities, Other Health Impairment, Specific Learning Disability, Hearing Loss, and Speech or Language Impairment, to the **New England School for Girls (NESG)** in Bennington, VT?

**SECRETARY'S RECOMMENDED ACTION:**

**That the State Board of Education grants renewal of general and special education independent school approval, to serve a maximum of 35 female students ages 13-20, within the disability categories of Emotional Disturbance, Intellectual Disability, Multiple Disabilities, Other Health Impairment, Specific Learning Disability, Hearing Loss, and Speech or Language Impairment, to the New England School for Girls (NESG) in Bennington, VT, for a term ending June 30, 2021; and**

**This approval is conditional on the requirements that the school reports to the Agency of Education within five business days whenever changes occur in enrollment, programs, policies, facilities, financial capacity, staffing, or administration, during the approval period.**

**STATUTORY AUTHORITY:** Title 16 V.S.A. §166 (b)  
State Board Rules 2228 et seq.

**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. The New England School for Girls is seeking renewal of general and special education independent school approval.

4. Upon receiving the New England School for Girls' application, the Secretary appointed a review committee to visit the school and make a recommendation as required by SBE Rule 2222. Because the New England School for Girls was seeking approval to provide both general education and special education services, the recommendation consists of two separate reports.
5. The New England School for Girls is licensed as a Residential Treatment Program by the Department for Children and Families (DCF). In September of 2018 DCF increased the residential capacity for New England School for Girls from 30-35. The additional students will be housed at Red Cottage, which is a newly renovated building on the Matteson Campus. A Certificate of Occupancy (CO) for the Red Cottage is on file at the AOE.
6. **Amendments to NESG' Department for Children and Families' (DCF) Licensure**

In September of 2018, DCF increased the residential capacity for New England School for Girls from 30-35; in October of 2018, DCF increased the ages to be served from 13-19 to 13-20. DCF licensure is linked to SBE approval for those therapeutic schools which serve state-placed children and youth. With these changes, NESG's program will be divided into two tiers: The first tier is a subacute program on Vail Road (formerly Green Meadows now Green Meadows North) with six female youth, the second is on College Road (formerly Frost and now Green Meadows) with eight female youth. Both these programs will be standalone, self-contained education programs.

As each youth stabilizes (as evidenced by lessened symptom acuity), she may move into the second tier to allow for increased self-direction. This tier is the last step in NESG's continuum of care. The youth will be educated at the Vermont Permanency Institute (VPI) South Main educational building, where students will attend core classes that are inclusive of a less restrictive educational setting. The academic day consists of a rotation between general education classes and electives. These youth will live on the Matteson Road campus: Matteson Dorm will have nine girls, Matteson Road (formerly Red Cottage) will have five girls, and Matteson Road (formerly Green Meadows North) will have seven girls. Certificates of Occupancy (CO) are on file for each of these facilities.

The following represents the findings of the general education contractor and the special education consultant at the point of time their visits were conducted; therefore, they do not speak to the changes listed under item 6 above.

## GENERAL EDUCATION

The New England School for Girls, redesigned in 2016 and with an initial two-year SBE approval, serves up to 30 students. The School has four residential settings and three educational settings located in Bennington and North Bennington, Vermont. The mission of the school has the academic/educational program at its core. The New England School for Girls program is designed to provide a setting for a continuum of care for phase-based trauma while also providing academic programs that will result in academic success by using a high staff to student ratio allowing for opportunities for girls to build strengths and enable pro-social interactions and relationships. The educational programming, serving 13-19 year olds girls, provides for a core classroom experience with the opportunity for electives throughout the day.

### School Site Visit

Steven Lorenz arrived at The New England School for Girls just before 9:00 am and left the site at about 1:30 pm. The schedule of the visit is below. My day began with a meeting of key staff/administrators that gave me an understanding of the breadth, depth and quality of the academic and therapeutic aspects of the school and programming. Upon completion of my meeting, I was given an extensive tour of the facilities, which allowed me to observe academic and elective programs/classes, as well as get a sense of the physical facilities. I had the opportunity to meet a number of staff (with various responsibilities) and then interviewed the teachers who deliver the academic program. My visit ended with a question and answer session, and a debriefing meeting with four of the key administrative staff.

### VAOE visit for (General Education for NESFG)

#### Interview & Tour

#### VPI Great Room

9:30 AM

**Lenny DaRosa, Kathy Houran,**

Academic Director, Special Educational Coordinator

**Ralph Bennett, Lee Gallagher**

Executive Director, Clinical Director

**Tammy Shupka, Lisa Smith**

Human Recourse, Admissions Director

**Scott Goetz, Dave Wendling**

Residential Director, IT/Training Coordinator

**Rhonda Caron, Nurse**

10:30 AM

#### Tour Facilities of New England School for Girls

(Kathy) Sped.Ed. : Frost/ (Lenny) Gen. Ed. Green Meadows

11:30 AM

**Interview Teachers**

1:30PM

**Lenny DaRosa, Kathy Houran, Lee Gallagher, Ralph Bennett**

Exit Interview

### **Description of Facilities**

The facilities of the New England School for Girls (NESFG) are of high quality, neat and well maintained. The school owns all but two of the buildings currently in use. The buildings and classrooms are ADA accessible, the heating systems are inspected regularly and the CO from the VT Division of Fire Safety granting occupancy for educational purposes was available for review.

The various buildings comprising the campus were:

- \*The administrative building with a variety of offices
- \*The Green Meadows building with a classroom, offices, bathroom, cafeteria and a dormitory
- \*The Green Meadows North with a similar layout as described above
- \*The Frost House with a similar layout including a “peace room”,
- \*Matteson Campus has a Wellness Center, with a “peace room”, 4 clinical offices, and bathroom with a separate dormitory building.
- \*Additional facilities available to students were; two greenhouses, a gym, a sugar house, a great room, and a yoga studio.

### **Minimum Course of Study and Required Assets 16 V.S.A. § 906.**

A minimum course of study of learning experiences were present, demonstrated and accurately depicted in the application. The learning programs/courses/classes are specifically and intentionally adapted to a pupil’s age and ability in the field of: Basic Communications Skills (including reading and writing); Mathematics; Citizenship, History, and Vermont and U.S. government; Physical and Health education; English and American Literature; Science; Fine Arts; including but not limited to opportunities for Independent Study; Community Art Projects; Intergenerational Projects and more. Most importantly, the academic program and curriculum is standards based being aligned to the Common Core State Standards and the Vermont Framework of Standards.

## **Staffing: Adequacy; Qualifications; Professional Development**

The number of administrative, support and teaching staff allows for a very low ratio of staff to students. The staff listing that was submitted with the application and the resumes available during the visit indicated that all administrators and teaching staff had minimally Bachelors Degrees with many having advanced degrees such as Masters Degrees and Doctorates. These degrees, combined with past educational and valuable life experiences, has made this a “highly” qualified staff. My observations and interviews indicated a high level of staff expertise and passion reflected in the student experience. The combination of an academic and therapeutic delivery model has brought with it a variety and large number of rigorous and vigorous professional development requirements and opportunities. All stakeholders I talked with during the visit knew the mission, the core values and educational objectives of the school. All job descriptions and resumes were available for my viewing. Professional/Personal Development/In-Service opportunities and requirements are listed in full in the school’s application.

## **Financial Capacity**

Available to the reviewer, on site and delivered with the school’s application was an extremely detailed Independent Auditors report, a Consolidated Statement of Financial Position and Supplementary Information including a P & L and a Balance Sheet that indicates without a doubt that the school is in the enviable position of being adequately funded and fiscally healthy.

**Student Attendance and Assessment Records. Fire Drill and Safety Records.** These records were reviewed and were found to be in good order.

## **Operating Schedule: Number of Instructional Hours.**

The school maintains an operating schedule that includes a total number of instructional hours of 1,592.5 and 245 school days each year.

**Policies: Admission, Health and Safety, Discipline, Harassment/Bullying.** Review of the school’s staff handbook and student/parent handbooks revealed that the school has developed policies for health and safety, admission, discipline and more. The school has a policy on prevention of harassment that is as stringent as the Department’s model policy with reporting to the DCF when appropriate.

**School Improvement Plans.**

The school has no immediate plans for renovations or improvements for the facilities at this time.

**Summary and Recommendation**

I recommend the SBE renew Independent School Approval for the New England School for Girls in Bennington, Vermont for a Five (5) Year Term. I make this recommendation based on a complete and comprehensive application, supporting documents and my site visit.

I am confident the school will carry on with their exemplary academic programs and support systems for students while leveraging their highly qualified staff, strong governance model and proven financial stability.

# Independent School Special Education Review Report

**REPORT**  
May 27, 2018

**NEW ENGLAND SCHOOL FOR GIRLS (NESG)**

**Submitted by**  
**Special Education Review Team**



### Approval Recommendation

Three year special education re-approval in the disability categories of: deaf/hearing loss, emotional disturbance, intellectual disability, multiple disabilities, other health impaired, specific learning disability, and speech or language impairment.

In addition, the AOE recommends that NESG implement the following prior to its next review:

- a) Consistent ongoing documentation system to confirm delivery of all IEP services. The documentation system should include;
  - a. Name of student
  - b. Service being provided
  - c. Service provider
  - d. Date of service
  - e. Time/length of service
- b) The IEP service page should reflect all of the education and related services that a student receives, i.e. transportation, counseling, transition services, consultation, etc. These services should be based on the individual student's need.

### Rationale

Based on the rules for Special Education Approval for Independent Schools, NESG did not adequately meet expectations upon the visit date. The review found that data and documentation were missing to confirm service delivery and progress reporting. Based on post-visit submission (5/2/18) from NESG, the Agency of Education finds that corrective actions made in the short term can ameliorate the concerns and therefore allow NESG to continue serving students it is currently approved to serve. The Agency will review in three years to ensure these recommendations are implemented systemically.

### School Description

NESG is seeking re-approval in the disability categories of: deaf/hearing loss, emotional disturbance, intellectual disability, multiple disabilities, other health impaired, specific learning disability, and speech or language impairment. NESG is serving 30 students ages 13-19. There are no Vermont students whom are currently being served by an Individualized Education Plan (IEP).

### Review Description

NESG located in Bennington, Vermont, was visited by Agency of Education staff on 4/17/2018. According to student records, there are no Vermont students receiving special education services at this school. During the visit, Agency employees interviewed staff, toured facilities, observed staff/student interactions, and reviewed an example redacted IEP and student file. The student reviewed qualified under the disability categories of emotional disturbance and specific learning disability.



## Review Findings

2228.1 – NESG demonstrated the policies, procedures, and staff training to support students in the disability categories of; deaf/hearing loss, emotional disturbance, intellectual disability, multiple disabilities, other health impaired, specific learning disability, and speech or language impairment.

2228.3 – NESG demonstrated 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.

2228.3.1 – NESG did not demonstrate sufficient evidence in all of the following; minimum maintenance of (1) educational records, and coordination with LEA, (2) participation in evaluation, and IEP procedures, (3) implementation of IEPs.

## Note on Evidence

Based on a review of one student file, school documentation of schedules, staffing interviews, and Non Instructional Agreements, all services listed on IEP were unable to be confirmed, based on the class and school schedule provided. Post-visit submission (5/2/18) included documentation of communication with LEA requesting the IEP service page be updated to include a more accurate reflection of student needs. Additionally, NESG updated a form that is used when coordinating the development of IEP services with the LEA. The form did not include key pieces of information needed to develop the IEP service page, for instance whether the service will be one-on-one or small group. Finally, service documentation does not include the time and/or duration of service provided.

2228.3.2 – NESG meets expectations regarding licensed staff. Special education teachers are licensed by the Agency of Education.

2228.4 – NESG demonstrated policies, procedures, and written agreements outlining tuition and establishment of the division of legal responsibilities with regards to students on IEPs.

**Questions:** Contact Chris Kane at [chris.kane@vermont.gov](mailto:chris.kane@vermont.gov)

**COST IMPLICATIONS:** none

## **VTAOE STAFF AVAILABLE:**

Cassandra Ryan, Fiscal and Regulatory Compliance Coordinator



192 Fairview Street, Bennington, Vermont 05201

Dear Cassandra,

We are in receipt of the written recommendations of the Review Committee appointed for the renewal of the New England School for Girl's approval as an independent school. We understand that the recommendations for General Education and Special Education are for differing term lengths and as such pursuant to Rules 2222.2 and 2228.5(3) we would like to offer the following response.

We find the General Education report to be an accurate assessment of the New England School for Girls and very much appreciate the time and efforts of Steven Lorenz for a thorough review of our facilities, staffing, and educational efforts on behalf of our students. We are in agreement with the summary and recommendations as stated.

We do however have some concerns with the Special Education report. We feel that at the time of the review pursuant to rule 2228.3.1 we did have ongoing documentation in place and could have demonstrate evidence of our collaboration with LEAs in the coordination and implementation of the IEP process however, no student records were reviewed in full during this visit as we only have out of state student files. Although one student's redacted IEP was reviewed this was not a complete file review.

As stated in the report, we did submit post-visit corrective actions to the AOE review team which the Agency of Education found would ameliorate the concerns in the short term and that the Agency will review in three years. We do find the three year special education re-approval acceptable however, we would ask for further guidance and assistance from the AOE in the coming year to better understand and address the concerns that have prevented us from a full five year re-approval.

I would like to request the name of a specific AOE Special Education Staff member that we can consult with to ensure that we are meeting the Vermont Rules and Regulations for Independent Schools as they are interpreted by the Agency of Education.

Sincerely,

Lenny DaRosa  
Academic Director

Kathy Houran  
Special Education Director