

**AGENCY OF EDUCATION**  
**Montpelier, Vermont**

**TEAM:** School Finance

**ITEM:** Will the State Board of Education grant initial tutorial approval, to serve a maximum of three students in grades K-5, to the **INCLUSION Tutorial and Behavioral Services (TABs) Program** at the Howard Center in Burlington, VT?

**SECRETARY'S RECOMMENDED ACTION:**

**That the State Board of Education grants initial tutorial approval, to serve a maximum of three students in grades K-5, to the INCLUSION Tutorial and Behavioral Services (TABs) Program at the Howard Center in Burlington, VT, for a term through June 30, 2021.**

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

**STATUTORY AUTHORITY:** 16 V.S.A. § 11 & § 828  
State Board Rule 2230

**BACKGROUND INFORMATION:**

1. A tutorial program means education provided to a pupil who is placed in a short-term program that is not administered by a school district. The purpose of the program is to provide evaluation and/or treatment. This does not include home based tutorials, programs operated by a public school or collaborative, or a program of an independent school that has been approved under 16 V.S.A. § 166. The average length of stay for students in a tutorial program shall be not more than six months.
2. The State Board of Education shall approve a tutorial program if it complies with the Board's rules for tutorial programs, promulgated as Series 2230 (State Board Rules for Tutorial Programs). A school district shall not pay the tuition of a pupil except to a public or independent school or tutorial program approved by the State Board.

3. The INCLUSION Tutorial and Behavioral Services (TABs) Program is seeking initial tutorial program approval to serve a maximum of three students in grades K-5. The goal of the program is to provide the necessary support, stabilization, and assessment to support the student's transition back to the least restrictive mainstream educational environment.
4. On behalf of the Secretary of Education, J. Deborah Ormsbee and Pat Pallas Gray visited the site where the tutorial will operate on August 27, 2019.
5. The Board may grant approval for a term of not more than two years (SBE rule 2230.2.5).

**FISCAL IMPLICATIONS:** none

**STAFF AVAILABLE:**

J. Deborah Ormsbee, Independent School Review Coordinator

# **Independent School Review Report**

## **General Education & Special Education**

**REPORT**

August 27,  
2019- Review

# **INCLUSION**

## **Tutorial & Behavioral**

### **Services (TABs)**

Howard Center

**Submitted by**

**Independent School Review Team Members:**

**Education Representatives:**

J. Deborah Ormsbee & Pat Pallas-Gray



The Agency of Education's independent school review team met with Howard Center INCLUSION staff on Tuesday, August 27, 2019. Interviews were conducted at 138 Pine Street in Burlington on the lower level of the Baird School building. Personnel present for interviews were: the director of educational programing for both the Baird School and INCLUSION, Tutorial and Behavior Services (TABs) Program, a Vermont licensed special educator, elementary teacher with Vermont teaching license, K-6, interventionist and support personnel.

INCLUSION's proposed tutorial program objectives are aligned with State Board of Education Rule 2230.2.1. The proposed tutorial program:

- Meets short-term program requirement (capped at 6 months maximum)
- TABs program will serve a maximum of 3 students
- Services will be provided six hours per day and enrolled children will be assigned a one-on-one staff member
- Provides crisis intervention for grades K-5 with identified program capacity of three students to ensure a student's readiness and availability for learning
- Programing provides mental health and academic evaluations to assist children in closing achievement gaps, learn and practice skills as identified in IEPs, develop life skills, as well as, teaches classroom skills to ensure successful transition back to public school
- Staff implement comprehensive grade-level literacy and math-based instructional services
- Programing is structured to meet and implement the service delivery plan's mental health goals as required by student IEPs and 504 plans
- Access to specialized contracted services, as needed, such as but not limited to: speech language specialist, occupational therapy, trauma informed mental health services and intensive family-based services and supports

At the time of program review, Agency staff were able to confirm evidence of specific, stated educational objectives which includes: differentiated instruction, project-based learning, Common Core curriculum, and utilization of Multi-Tiered Systems of Support. Trauma informed and social emotional practices that provide additional support to close student achievement gaps are imbedded in all areas of academic learning and behavioral plans.

**Tutorial Application Requirements***Vermont Rule 2230.2.1*

The INCLUSION tutorial application was complete and included required documentation at the time of submission.

**Tutorial Enrollment***Vermont Rule 2230.2.1*

INCLUSION receives referrals from neighboring LEAs and students enrolled will follow the calendar year of their sending school. INCLUSION's proposed program will serve no more than three intensive, high needs students requiring academic supports and intensive based behavioral interventions. All students admitted to INCLUSION will have an IEP and service delivery plans will include trauma informed support services.

**Student Records, IEPs & Special Ed Status***Vermont Rule 2230.3.10.1, .4, .5*

Agency of Education representatives verified that INCLUSION's student records and electronic filing system will meet State and Federal confidentiality requirement standards. Client education records and other related physical documentation will be kept in the same location as Baird School files, albeit in a separate locked room. Each student's attendance records will be completed by program staff daily and included in confidential student files and will verify student attendance in tutorial programming services for no less than required 10 hours per week.

Student referrals made by sending LEAs will go to designated in-take program director who will forward a referral packet to LEAs. Included in the referral packet is "... Agreement to Services" form, that requires a parent, guardian or custodial adult to sign, resulting in granting staff access to pertinent student files and information such as: most recent IEP, recent comprehensive evaluation, medical information from primary care physician and other identified related documentation, as required. Additionally, all consent forms, permission slips and initial admission or in-take paperwork is included in the primary student file.

Sending LEAs are responsible for the development of student IEPs and will specifically identify services to be delivered by staff at INCLUSION's Tutorial and Behavioral Services Program. The special educator and interventionist at INCLUSION will work directly with licensed K-6 educator to implement individualized tutorial programming for each student. Prior to student enrollment; however, a formal meeting will take place for all program staff. During pre-

enrollment meetings, staff will review IEPs to ensure compliance with all IEP requirements for academic and behavioral programing.

INCLUSION staff will meet regularly with each student's LEA to review student academic and behavioral progress. Adjustments to interventions both educational and behavioral, will be made, as needed by sending LEAs and provided in a timely manner to the INCLUSION staff for implementation and evaluation. As a result, LEAs will receive information from INCLUSION in order to authentically inform successful completion of comprehensive special education evaluations.

Student evaluations will be conducted and completed collaboratively between and among INCLUSION program educators and clinical behavior specialist during both the "planning and reintegration process" for each student. INCLUSION's service goal is to develop, implement, evaluate and create authentic personalized student reintegration plans to assist with the transition back to public school.

The tutorial's staff will start transition planning, implementation and coordination of services three months prior to conclusion of tutorial services. Monitoring of student progress towards transition date will be performed by the INCLUSION Director, Special Educator and other relevant program staff and "an agenda item" for each student at his or her "monthly meeting." Individualized student academic and behavioral plans and progress evaluations inform each phase of a student's tutorial services and transition plan.

<b>Tutorial Professional Staff</b>	<b><i>Vermont Rule 2230.3.4</i></b>
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INCLUSION's proposed tutorial program will be staffed by a special educator with a Vermont license, an elementary teacher who holds a Vermont K-6 teaching license, program interventionist who holds a Vermont educator's license endorsed in English/Language Arts and support personnel trained in Therapeutic Crisis Intervention. Tutorial program management, fiscal oversight and delivery of special education services will be provided by the Director of Educational programing. Both the Program Director and Special Educator will collaborate to ensure transition plans are effectively developed in accordance with IEP goals.

In addition to maintaining relevant licensure, tutorial staff members (including support personnel) are expected to participate in and satisfactorily complete additional required professional development to address the following IEP, general education and special education program area goals:

- Therapeutic Crisis Intervention
- ACEs (Adverse Childhood Experiences) training
- Trauma informed educational practices and PBIS
- Differentiated Instruction, MTSS & instruction in content area best practice pedagogy

- Effective development of individualized learn plans

## **Tutorial Methods of Instructions & Evaluations**

*Vermont Rule 2230.3.8*

Tutorial program administrators, and teaching staff have worked to develop evidence-based, best practice instruction methods for high needs students, in concert with implementing any LEA required curricula forwarded to program teaching staff. Agency of Education representatives received a thorough review of program materials that include:

- Oak Meadow Curriculum and Assessments
- Wilson Reading System
- Moving with Math Learning Systems-Foundations & Foundations for Algebra
- DreamBox Learning
- RAZ-Kids
- Scholastic Guided Reading Short Reads
- Word Journeys
- Handwriting Without Tears

Other evidence-based curriculum and assessments will be utilized as needed to ensure INCLUSION meets individualized student programing goals. Additionally, instructional staff will be trained effectively to ensure successful adaptations to curriculum, as needed, to integrate trauma informed and PBIS supportive programing services.

Evaluation and assessment strategies will utilize individual learning plans and best practices. INCLUSION will develop, implement and assess student portfolios to compile evidence of student work, academic progress and assessments.

In order to assess behavioral component of tutorial program services, an assessment will be conducted twice during each student's six-month enrollment in the INCLUSION program. At this time, the Special Educator will determine if a student requires additional evaluations to determine either identification of a new disability or mark progress in meeting IEP goals.

Supportive technology will be available for student use in order to adapt student learning, project-based learning assignments and authentic assessments, as needed. Identified support materials will include, but are not limited to: iPads, sensory materials, content area and behavioral reinforcers in various forms, and community-based learning.

## **Facilities, Materials, Health & Safety**

*Vermont Rule 2230.3.2, 2230.3.3*

The INCLUSION Program's' tutorial will be located on the lower level of Baird School building and the program shares the cafeteria, gymnasium, library and other opportunities in the facility when available. A Certificate of Occupancy (CO) has been granted and filed with the Agency of

Education. The building meets all requirements pertaining to use as an educational facility. The building also meets Americans with Disabilities Act (ADA) requirements by providing an elevator and internal emergency egress points for students and staff requiring mobility supports.

Space specific to INCLUSION’s Tutorial Program includes four class/sensory rooms, closets for outdoor clothing and effective storage for student’s personal items, two bathrooms, an individualized smaller kitchen/cafeteria area and academic, behavioral enrichment activities rooms. The program has two egress points, in case of emergencies, an elevator and internal stairways.

Safety information including location maps, fire extinguishers and emergency contact numbers are prominently posted in multiple, highly visible areas. Emergency directions and other pertinent information has been translated into multiple languages that include graphic, easily understood emergency pictograms and corresponding emergency contact numbers.

First Aid and other life-saving equipment is visible and meets health and safety code requirements. INCLUSION tutorial staff and students will participate regularly in scheduled fire drills and active shooter training or shelter in place crisis response interventions with Burlington Fire and Police Departments.

Finally, all staff members will be required to attend multi-day First Aid and emergency response specialized training during August in-service each year.

<b>Tutorial Financial Capacity</b>	<i>Vermont Rule 2230.3.9</i>
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The Howard Center submitted a copy of the agency’s current financial report. A copy of all financial documentation is on file at the Agency of Education. The TABs program meets requirements and standards for fiscal capacity as proscribed in State Board Rules.

Appendix G of the TABs’ program application includes extensive financial data, including but not limited to: annual independent auditor’s reports, statements of revenue and expenses, cash flow and corresponding projections FY20, client fee schedules, PNMI Revenue and expense reports, a schedule of federal award monies and related expenditures.

At the date of Agency of Education’s review, Howard Center’s INCLUSION program had sufficient data to support and meet current fiscal program responsibilities. Furthermore, Howard Center’s fiscal department is well managed, and all accounting practices meet requirements for fiscal capacity under State Board of Education Rules: 2230.9 ... [the] “program has financial capacity to carry out its educational purpose for the period of approval.”<sup>1</sup>

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<sup>1</sup> Guidelines for Vermont Approved and Recognized Independent Schools, Rule Series 2200, Vermont State Board of Education, 2009., pg. 22.