

# **Site Review**

## **Renewal – East Burke School**

### **Independent School Review Report General Education**

#### **Site Review Conducted**

**Virtual Review- August 6, 2021 & On-site Review 10-26-2021**

Submitted by Independent School Review Team:

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## **Site Review Scope of Work and Purpose**

An initial review of East Burke School was conducted virtually, as prescribed by both the State Board of Education and Agency of Education policies, under COVID-19, on August 6, 2021. The AOE's independent school team could not align program information obtained during virtual review with submitted support documentation or the general education renewal application. As a result, the independent school team requested East Burke School program directors update and resubmit the school's renewal application, and requested the school participate in onsite classroom observations, and provide a tour the East Burke School facilities. The on-site portion of the program's review was completed on October 26, 2021.

## **General Education**

### **School Philosophy & Educational Objectives**

*State Board of Education Rule 2225.2, 2225.5*

#### **School Philosophy**

“ The mission of EBS is to embrace learning as a natural process of human growth by teaching the critical skills that will prepare students to be innovative, creative, and responsible in our global community. Intellectual and personal integrity are as important to us as the rest of the curriculum. Decision making at East Burke School is done communally. We regularly reflect on our own activities as well as on current events to sharpen our students' sense of right and wrong. “

#### **Program Objectives**

East Burke School's approved capacity is eighteen students, and neither the Board nor education directors requested an increase in student enrollment as part this renewal cycle. The current classroom structure is small and comprised of multi-grade groups of students from grades eight through twelve. Stated objectives included in the renewal application, per Rule 2225.5 describe courses that...

“East Burke School offers small class sizes, flexible scheduling, an interdisciplinary approach to learning with yearly themes, time set aside for students to explore their own interests, community service opportunities, self-directed learning, in-depth narrative evaluations (not grades), off-campus learning opportunities, and whole school learning opportunities. We are committed to remaining small...This allows us to truly focus on each student's academic, social, and emotional growth. Our curriculum includes our students' passions, hobbies, and interests. We encourage [students] to identify an area of special interest and make it a part of their high school experience.”

## **School Enrollment**

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

AOE Independent School representative present for the October site visit, confirmed seven students are currently enrolled at East Burke School, FY22. These students are primarily from Kingdom East SU, a school choice district. When asked to confirm student enrollment numbers, East Burke School's co-directors stated that two students were currently truant, and their attendance was very low since the start of FY22. Agency of Education staff asked the school's administration to contact the LEA's administration and engage with responsible truancy officers to report identifying student information.

Students are enrolled in East Burke School through a rolling admission process. Under the school's current enrollment process, a parent/guardian contacts the school by phone, and a plan is made for the student to do a "shadow" day.

If the consensus among the three co-directors determines East Burke School is a good fit in meeting student needs, administrators reach out to the youth's most recent school attended to obtain copies of his/her educational records. In the course of the virtual visit, the independent school team learned that over a half of the students enrolled were previously on an IEP or 504 plan as identified by LEA of origin.

## **Governance**

State Board of Education Rule 2225.4

The East Burke School community revised its governance model and by-laws in 2019. Currently, the board of directors is comprised of five to seven members. Outgoing and current members identify potential future board members during the annual directors meeting. Members of the Board are presented at the annual board meeting, and the term of office of each board member is for two years. Additionally, East Burke School's corporate officers consist of a president, vice-president, secretary, and a treasurer, elected under the purview the board of directors. Responsibilities for the school's three co-directors, who also serve as the three employees, is to share responsibilities for all aspects of the school community including to provide instruction.

## **Minimum Course of Study & Required Assessments**

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

The school day begins, for all students, with a homeroom advisory group. Additionally, the week begins on Monday morning with a meeting to prepare students for the week ahead. Students, once released from Monday's meeting, follow a traditional school day schedule. Class offerings follow a traditional block schedule for grades, eight through twelve.

Students attend core subject classes for English, history, math, and science. Electives include languages, a variety of fine arts and student-centered high interest subject areas. Each day concludes with advisory groups for student to receive individualized support for either class assignments or homework assignments. Agency personnel present on October 26, 2021, observed history and math classes as well as the end of the day advisory period.

Independent School Team members conducted extensive interviews with all three East Burke School co-directors/instructional staff during COVID virtual review on August 6, 2021. Agency staff could not, at that time, align school staff responses for basic minimum course of study requirements, authentic assessments, or progression standards between grades. Specifically, school administrators could not provide evidence or a document which best practice methods instructors utilize to develop appropriate grade level curriculum and equivalencies. Student transition goals, between grades, were unclear and graduation level requirements for seniors were not developed, available for review by agency staff members or available for families with children in the twelfth grade.

Assessment methods at the East Burke School currently utilize narratives only. However, when pressed to explain the qualitative and quantitative best-practices employed by academic staff to support progress report narratives, no explanation was provided.

The instructor assigned to teach math and science reported using “the Socratic method of instruction” during multi-age/grade classes but was unable to identify which Socratic curriculum was the basis for instruction and how it is appropriately adapted for IEP, 504 Plan students and with multi-graded classrooms. Agency personnel asked for pre-teaching practices employed by staff to assist students with understanding Socratic instruction as well as requested examples of assessment standards that accompanied the school’s Socratic class instruction, including age/grade appropriate differentiation. No examples were provided by East Burke School staff members.

After the virtual review of East Burke School, agency personnel requested specific support documents for the following minimum course of study requirements (2225.5, 16 V.S.A. § 906):

- a formal curriculum plan for each grade level to include standards chosen by East Burke School administration and Board members
- twelfth grade requirements and benchmarks for determining if and how a student has met graduation requirements
- methods of assessments to support narrative student progress reports
- methods of instruction to support any student with IEPs and 504 Plan to ensure access to academic program
- A formal plan on how East Burke will come into compliance with statutory/SBE rules regarding state required assessments.

East Burke School staff were given the required thirty days to submit requested documentation to the Independent School Team. By the end of September 2021, some important and essential

documents remained outstanding. Additionally, the documents submitted did not align with staff interviews held during the virtual review on August 6, 2021.

Between August and early October, agency personnel provided on-going technical assistance to help East Burke School co-directors understand what is required to meet requirements for minimum course of study (MCOS). On October 18, 2021, an administrator from the school submitted a curriculum proficiency-based standards document for each grade served, 8- 12.

A thorough review of the submitted curriculum revealed it did not align with information included in the renewal application, or with information obtained during staff interviews held on August 6, 2021, or throughout technical assistance sessions offered by Independent School personnel, August – October 18, 2021. As a result, it was determined an onsite visit to include classroom observations, direct interviews with all three co-directors and a tour of the school facilities would be necessary to obtain an accurate understanding on the school's academic programming.

At the beginning of the October 26, at the in-person review, AOE staff requested copies of lesson plans for scheduled observations in math and history. No lesson plans were provided for either content area class. The history class instructor provided a copy of a student reading assignment that included two summative questions. The model of instruction for observed history class included some direct instruction and small group student collaboration and a summary. The observed math class included direct instruction, student self-testing and questions and answer sessions.

Observations for both the math and history class did not reveal obvious or discreet methods to accommodate students with IEPs, 504 Plans or for grade level specific instructions, typical of a multi-age classroom. Due to the absence of available lesson plans, the Independent School Team member could not align class instruction with the curriculum documentation submitted to the agency on October 18, 2021.

It is important to note, the Agency of Education's experience during class observations increased the level of concern regarding the number of special education students enrolled with individual education plans (IEPs) or 504 Plans. As a result, contact was made with school choice LEAs to discern East Burke's process of addressing special education student needs during enrollment periods.

Agency personnel learned, from an LEA, that in 2018, Kingdom East SU's student services director reached out to East Burke School directors requesting an enrollment meeting to discuss having all East Burke School students from the LEA, enroll at a minimum, with 504 Plans. Kingdom East's student director offered to take responsibility for drafting and administering each student's 504 Plan.

Kingdom East wanted to ensure effective academic supports were in place at East Burke School to ensure each student's access to prerequisite general education. In the wake of the initial meeting between the two educational entities, East Burke's administration informed school choice LEA's that as an approved general education independent school, instructors would not provide IEP/504 Plan services as there is no requirement to do so. This information was

confirmed for Agency of Education personnel by contacting the school choice supervisory union's administration, and director of student services on December 2, 2021.

### **State Assessment Requirements**

Agency staff requested information on how East Burke School administered required state assessments and how the tests were accommodated for students with IEPs or 504 Plans. East Burke's co-directors disclosed that they do not currently offer or complete required state assessments for enrolled students. The Independent School team advised the school to contact the AOE's Assessment Team to come into compliance with this statute and SBE rule immediately.

### **Professional Staff**

#### **State Board of Education Rule 2225.8**

East Burke School has three co-directors that also serve as subject area instructors. These staff members are also responsible for instruction in languages, fine arts, and various student electives.

Prior to the August 6, 2021, virtual review, Agency of Education personnel reviewed and confirmed that East Burke School staff had required credentials to ensure each instructor met the minimum qualifications to teach in an independent school.

### **Staffing Safeguards:**

Background checks are conducted prior to start date for all newly hired employees. Fingerprint supported criminal records check and Vermont adult/child abuse registries are checked annually. Currently, the school does not engage the services of any outside contractors responsible for academic or support services. Therefore, all East Burke staff members have complied with background checks and reports are contained in confidential personnel filing system, available for review, upon request.

### **Mandatory Reporting Procedures:**

Agency of Education site reviewer was unable to confirm if mandatory reporting training is conducted annually for all instructors and staff.

### **Facilities**

#### **State Board of Education Rule 2225.6**

East Burke School is in the village of East Burke, Vermont. The school building is an historic structure that formerly served as a mill, a radio station and now as a school.

Although the structure is more than one-hundred years old, it is in satisfactory repair and recently underwent a fire and safety review performed by the local fire department. School administrators submitted the certificate of occupancy, as required, to members of the Independent School Team. The school conducts monthly fire drills and other emergency response protocols with all students and staff.

Agency personnel performing site review noted that the building has a well-maintained handicap accessible ramp at the entrance of the building. Additionally, accessible bathrooms were clean and in good repair.

Students bring their own lunches to school. A full operational kitchen is available for staff when teaching health, wellness or other curriculum requiring access to this workspace.

Classroom spaces on the second floor, including a space that serves as an art room and craft or industrial arts instruction area, were not well organized. Counter tops were covered by an array of unlabeled construction tools, unorganized scraps of plastic, art supplies and other indiscernible materials. Sharp objects were co-mingled with other miscellaneous tools on each counter. If safety instructions were posted in these workspaces, they were not easily visible.

A large common area instructional space, also on the second floor, was not as congested with miscellaneous materials; however, several workbenches and shelving along two walls contained disorganized curriculum and other unknown educational materials.

The technology/radio room was dark, poorly lit, and unorganized as well. It was difficult to determine how this space is utilized as part of the curriculum or for high interest student electives.

There are several small-class or group instructional areas on both the first and second floor. These areas were more organized and provided easier student/staff access to curriculum materials, when required. In general, AOE review representative recommends that more attention is required by East Burke School's Directors to address the clutter and level of cleanliness of the facility.

### **Emergency Services:**

In an emergency, East Burke School staff contact 911 Emergency Services. Each of the school's co-directors have completed first aid and CPR training/certification

### **Nursing Services, Medications and Immunization Records:**

East Burke School does not have a school nurse on staff or access to a nursing professional. Administrators indicated that it is an expectation that students take required medication(s) at home prior to attending school.

School administrators reported that student immunization records are up to date and included in student files located in administrative offices.

### **Hazing, Harassment & Bullying Policies**

Administrators of the school have a *draft* document that does not comply with required policy, as posted on AOE website for hazing, harassment, and bullying procedures. The school's administration currently shares the school's draft document of these policies with students, parents, and guardians in the absence of a complete school handbook.

## **Financial Capacity**

East Burke School sent a notarized letter signed by the school's Board of Directors affirming it has sizable capital equity to fulfill its stated objectives. A copy of the school's 990 and a balance sheet was also provided.

## **Independent School Team Recommendation**

East Burke School's programming does not currently meet all State Board of Education Rules and educational requirements under 16 V.S.A. § 906. The program areas of greatest concern, for Agency of Education personnel, pertain to minimum course of study requirements under 2225.5 and 2226.3. Specifically, three program areas are not compliant with 16 V.S.A. § 166, 16 V.S.A. § 906 and SBE Rule 2200.

First, the school does not meet the requirements to offer the minimum course of study as required by 2225.5 and 2226.3. The MCOS must be "adapted to a student's age and ability" 16 V.S.A. 906(b).

Second, East Burke did not provide evidence to demonstrate that the curriculum is adapted to student age, or that the offered MCOS is "age and ability appropriate" as required by 2226.2. The school did not provide evidence that student progress is assessed according to a system of records maintained by the school as required by 2226.3.

Finally, East Burke School is not compliant with the requirement to administer state assessment(s) to students whose district of residence pays tuition on the student(s) behalf under 16 V.S.A. § 166(g).

The Agency of Education's Independent School Team is unable to recommend renewal of approval for East Burke School at this time.