

**NEW HAMPSHIRE
DEPARTMENT OF EDUCATION
SPECIAL EDUCATION
PROGRAM APPROVAL VISITATION
CASE STUDY COMPLIANCE REVIEW**

**Pine Haven Boys Center
SUMMARY REPORT**

**Fr. Paul Riva, Executive Director
Michael Maroni, Principal**

Chairperson, Visiting Team:

Jane Bergeron-Beaulieu, M.Ed. Education Consultant

Site Visit Conducted on March 5-6, 2009

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I. TEAM MEMBERS

Visiting Team Members:

NAME	PROFESSIONAL ROLE
Chairperson: Jane Bergeron-Beaulieu	Education Consultant
Dr. Eric Schroeder	Director of Special Education
Gretchen Cook	Coordinator of Education
Santina Thibedeau	Administrator, NHDOE Bureau of Special Education

Building Level Team Members:

NAME	PROFESSIONAL ROLE
Maureen Lee	Classroom Teacher
Paul Riva	Executive Director
Amy Kurz	Classroom Teacher
Janice Godzyke	Tutor
Barbara Girard	Classroom Teacher
Jean Strollo	Classroom Teacher
Michael Maroni	Principal
Sharon O'Brien	Occupational Therapist
Meghan McNamara	Family Worker
Kim Denler	Therapist
Rand Lounsbury	Case Manager
Catherine Reeves	Keene Special Education Director, Ed Surrogate
Beth Irvin	Parent
Paula Koelher	Speech Pathologist
Karen Galloway	SAU Representative

INTRODUCTION

Pine Haven Boys Center was established in 1963 when a group of interdenominational leaders approached the Somascan Fathers with the desire to develop a program dedicated to provide a therapeutic setting for troubled boys. Pine Haven continues to serve as a residential treatment center inclusive of a special education school that is approved by the New Hampshire Department of Education, Bureau of Special Education. The residential component of Pine Haven is licensed by the New Hampshire Department of Health and Human Services and certified by the New Hampshire Division for Children and Youth Services. The center is currently approved by the Bureau of Special Education to provide special education programming to 20 male students between the ages of 6-15 in grades 1-8 who have been identified as having one or more educational disabilities to include: Emotional Disturbance, Other Health Impairments, Mental Retardation, Developmental Delay and Specific Learning Disabilities. At the time of the March 2009 Case Study Compliance Review at Pine Haven, one identified student was enrolled with multiple disabilities, for which the program is not currently approved.

Pine Haven Boys Center is located in Allentown NH on a 33-acre campus that, as of March 2009, had an enrollment of 18 New Hampshire students and one student enrolled from Vermont. The school administration indicates that, on occasion, students have been accepted to Pine Haven that are not identified with an educational disability. Of the 18 NH students enrolled at Pine Haven, the majority has been court ordered and all but one resides on campus. The average length of stay for students is reported as being 18 months. The special education programming is provided year round, as are residential services. Pine Haven Boys Center is designed to meet the needs of young boys with significant emotional and learning challenges, and during the last several years has become increasingly involved in the treatment of sexually abused, sexually reactive/acting out population. The school setting consists of four self-contained classrooms with a staff to student ratio of 1:5. Related services are provided to include speech/language and occupational therapy, both of which are provided through contracted services.

According to the school brochure, Pine Haven's philosophy is summarized in two statements:

1. "There is no such thing as a bad boy."
2. "Children need and are entitled to their families."

Pine Haven's expressed mission is to; "provide troubled boys with positive experiences and success oriented programs."

SCHOOL PROFILE

SCHOOL DEMOGRAPHICS	2007-08	2008-09
Student Enrollment as of December 1	16	18
Do you accept out-of-state students? If so, list number from each state in 08-09	Vt. - 1	
Number and Names of Sending New Hampshire LEAs (as of October 1)	Nashua (2), Fall Mountain, Rochester (2), Laconia, Newfound Regional, Merrimack Valley (2), Tamworth, ConVal, Bartlett	
# of Identified Students Suspended One or More Times	0	0
Average Length of Stay for Students	18 months	
<u>STAFF DEMOGRAPHICS</u>		
Student/Teacher Ratio (as of Oct. 1)	4:1	4:1
# of Certified Administrators	2	2
# of Certified Teachers	6	5
# of Teachers with Intern Licenses	0	0
# of Non-certified Teachers	2	2
# of Related Service Providers	1	2
# of Paraprofessionals	1	1
# of Professional Days Made Available to Staff	9 days earned time	9 days earned time

SPECIAL EDUCATION PROGRAM DATA		
Primary Disability Types:	2007-08	2008-09
Autism	0	0
Deaf / Blindness	0	0
Deafness	0	0
Emotional Disturbance	12	9
Hearing Impairment	0	0
Mental Retardation	0	0
Multiple Disabilities	0	1
Orthopedic Impairment	0	0
Other Health Impairment	1	4
Specific Learning Disabilities	3	1
Speech or Language Impairment	0	0
Traumatic Brain Injury	0	0
Visual Impairment	0	0
Developmental Delay ages 3-9	1	0

II. PURPOSE AND DESIGN OF THE CASE STUDY COMPLIANCE REVIEW PROCESS

The New Hampshire Department of Education (NHDOE) conducted a Special Education Program Approval Visit to Pine Haven Boys Center for the purpose of reviewing the present status of programs and services made available to children and youth with educational disabilities. As part of the NHDOE Special Education Program Approval Visit, two Case Study Reviews were conducted for the elementary programming at Pine Haven.

The New Hampshire Department of Education, Bureau of Special Education conducts program approval visits using a ‘focused review’ Case Study Model. This focused review permits the NHDOE to leverage its impact for change and improvement within school districts and private special education schools statewide by focusing the attention of all educators and program delivery upon the following three areas of critical importance in the provision of FAPE for students with disabilities.

- Access to the General Curriculum
- Transition Planning
- Behavior Strategies and Discipline

As part of this compliance review, case studies were randomly selected by the NHDOE prior to the visit, and staff were asked to present the case studies to assure compliance with state and federal special education rules and regulations. Other activities related to the NHDOE Case Study Compliance Visit include the review of:

- ♦ The prepared application materials
- ♦ The status of corrective actions since the previous NHDOE Special Education Program Approval Visit
- ♦ The personnel credentials for special education staff as verified by NHDOE
- ♦ The program descriptions and NHSEIS verification reports
- ♦ The information and data collected during the visit

The New Hampshire Department of Education provided a visiting team of professional educators to work collaboratively with staff at Pine Haven in conducting the Case Study Compliance Review and the data collection activities. Throughout the entire review process, the visiting team worked in collaboration with the staff of Pine Haven in conducting the onsite review of policies, procedures and program delivery. Their professionalism, active involvement and cooperation in the process was greatly appreciated and well recognized.

Evidence of the work conducted and results obtained as related to student outcomes was gathered throughout the process as guided by the materials and templates provided by the NHDOE, Bureau of Special Education. Examples of evidence included student Individual Education Plans (IEPs), progress reports, samples of student work, grades and evidence of extracurricular involvement. In addition, permanent records and curriculum materials were reviewed. Input was gathered from key constituents, including; interviews with professional staff, parents, and administrators and, in some cases, students. In addition, classroom observations were conducted for each of the case studies being reviewed. The visiting and building level teams at the conclusion of the visit summarized the collective data. The summaries included in the following pages outline the areas of identified strengths as well as those in need of improvement.

IV. STATUS OF PREVIOUS NHDOE SPECIAL EDUCATION PROGRAM APPROVAL REPORT AND CORRECTIVE ACTIONS

Based on review of the August 2006 Pine Haven NHDOE Case Study Compliance Review Summary Report, the following citations were identified and included in the Pine Haven Corrective Action Plan:

Citations	Status as of Date of Last CA Visit 9/24/07
Ed1109.08 Curriculum	Met
Ed1133.05 Program Requirements	Met
Ed1102.53 Transition Planning	Met
Ed1109.03 IEP Team Compliance	Met
Ed1109.01 Elements of an IEP	Met
Ed1133.04 Administration Policies & Practices	Met

V. MARCH 2009 CASE STUDY COMPLIANCE REVIEW RESULTS

Data collection is an important part of the NHDOE Special Education Case Study Compliance Review Process. It is essential that each case study team conduct an analysis of the data provided regarding student performance as well as the expanse of other issues and protocol to determine whether or not special education programs are in compliance with the criteria for the three defined areas of focus. In this process the ‘root causes ‘of any concerns that may be identified through the case study process will be sought. The depth of the review is intended to insure that the resultant reporting accurately reflects the nature and viability of the program delivery for the learning and developmental characteristics of the children served. As such, the NHDOE works with educational entities to ensure the visiting teams are allowed to give an in-depth focus on a limited number of cases and programs in order to responsibly report upon the relevance of the programs, practices, policies, procedures and culture of the school.

As part of the NHDOE Case Study Compliance review, two students currently enrolled at Pine Haven Boys Center were randomly selected for review. The students selected for presentation varied in regard to age, grade level, length of stay, and stage of transition.

LEA SURVEY

As part of the Case Study Compliance Review, all private schools are required to survey their sending LEAs. Results of the Pine Haven survey are below.

SUMMARY REPORT OF SENDING LEAs

Name of Private School: Pine Haven Boys Center		
Total number of surveys sent: 13	Total # of completed surveys received: 7	Percent of response: 54%
Number of students placed by: LEA: 2	Court: 16	Parent: 0

SCALE 4 STRONGLY AGREE 3 AGREE 2 DISAGREE 1 STRONGLY DISAGREE

	4	3	2	1	No Answer
1. The private school team has positive expectations for students.	5	2			
2. I am satisfied with the educational program at the above school.	5	2			
3. The school consistently follows special education rules and regulations.		4	2	1	
4. The school has an effective behavioral program (if applicable).	5	1			
5. I am satisfied with the related services provided by the school.	4	3			
6. The school implements all parts of students' IEPs.	5	2			
7. I feel the school provides the necessary skills to allow the student to make progress on the IEP goals.	6	1			
8. The school program measures academic growth.	5	2			
9. The school program measures behavioral growth (if applicable).	5	2			
10. The school completes a minimum of 3 comprehensive reports per year on each child with a disability enrolled.	4	1			
11. Progress reports describe the child's progress toward meeting the IEP goals, include a record of attendance, and are written in terminology understandable to the parent.	5	2			
12. Progress reports are provided to the LEA and to the parent of the child.	5	1			
13. I am satisfied with the way the school communicates students' progress.	4	3			
14. The school communicates effectively with parents.	5		1		
15. The school communicates effectively with the LEA.	5	1	1		
16. The school involves parents in decision-making.	4	2			
17. The school actively plans for future transition to a less restrictive placement.	3	3			
18. If the school finds it necessary to change or terminate placement, they notify the LEA by convening the IEP team to: review the concerns, review/revise the IEP, discuss the placement and determine if the facility can fully implement the IEP and provide FAPE.	3	2			
19. The school team sets meeting times that are convenient for both parents and LEA.	6	1			
20. The school has met my expectations.	6	1			
21. I have a good relationship with the school.	6				
22. I would enroll other students at the school.	6	1			

The 54% response rate to the LEA survey was favorable and allowed for a reliable analysis of the collective views of the schools and districts that have placed students at Pine Haven Boys Center. Predominate in the survey was confirmation of the caring and dedicated staff, and the favorable working relationship LEAs have with Pine Haven Boys Center. According to survey results, the overall communication between Pine Haven and parents and the sending school districts is strong. The LEAs report they are satisfied with progress monitoring of students, and that students enrolled are demonstrating success in meeting IEP goals.

Although the survey results were predominantly satisfactory, the lower ratings and references related to inconsistency in applying special education rules and regulations are worthy of attention and deliberate review by the Pine Haven administration and staff.

PARENT PARTICIPATION

A defining feature of effective schools is strong parent/community relations and open communication. Having parents as active stakeholders in the NHDOE Special Education Program Approval Process ensures broader perspectives and brings forward valuable insights on program effectiveness. As such, the parent perspective enhances and strengthens the teams' case study presentations, and manifests stronger school/parent relationships. In order to ensure parent participation and feedback, the NHDOE, Bureau of Special Education involves parents in a variety of aspects of the Special Education Program Approval Process, to include participation in a written survey as required by the NHDOE Compliance Review Process. The table to follow represents a summary of the results of the parent survey and a summary of the comments/feedback provided to the visiting team during the March 2009 Case Study Compliance Review.

SUMMARY OF PARENT SURVEY DATA

Name of Private School: Pine Haven Boys Center		
Total number of surveys sent: 14	Total # of completed surveys received: 10	Percent of response: 71%

SCALE 3 = COMPLETELY 2 = PARTIALLY 1 = NOT AT ALL

ACCESS TO THE GENERAL CURRICULUM:	3	2	1	No Answer
I am satisfied with my child's program and the supports that he/she receives.	9	1	0	
My child has opportunities to interact with non-disabled peers on a regular basis.	5	2	2	1
I am adequately informed about my child's progress.	10	0	0	
My child is informed about and encouraged to participate in school activities outside of the school day, and is offered necessary supports.	8	1	0	1
My child feels safe and secure in school and welcomed by staff and students.	7	3	0	
A variety of information (observations, test scores, school work, parent input) was used in developing my child's IEP.	9	1	0	
I am satisfied with the progress my child is making toward his/her IEP goals.	10	0	0	
FOR PARENTS OF HIGH SCHOOL STUDENTS ONLY:				
My child earns credits toward a regular high school diploma in all of his/her classes.				
TRANSITION:				
I am satisfied with the planning and support provided for the moves my child has made from grade to grade and school to school.	6	1	0	3
All of the people who are important to my child's transition were part of the planning.	6	1	0	3
FOR PARENTS OF STUDENTS AGE 16 OR OLDER ONLY:				
I am satisfied with the written secondary transition plan that is in my child's IEP.				
BEHAVIOR STRATEGIES AND DISCIPLINE:				
My child's classroom behaviors affect his/her ability to learn. <i>If the answer is yes, please answer the next two questions. If no, skip to OTHER.</i>	YES		NO	
	3	2	1	No Answer
I have been involved in the development of behavior interventions, strategies and supports for my child.	5	4		1
I am satisfied with the way the school is supporting my child's behavioral, social and developmental needs.	9	1	0	0
OTHER:				
I fully participate in special education decisions regarding my child.	9	0	0	1
I have been provided with a copy of the procedural safeguards (parental rights) at least once a year	10	0	0	0

The 10 parents who returned surveys represented a 71% response rate of the parents with students enrolled at Pine Haven at the time the survey was administered. The results provided valuable insight to the school's effort to engage parents and families in the life of the school. The surveys indicate that parents are generally satisfied with the programming and services provided to their child and that Pine Haven is particularly attentive to communications related to progress reporting and the information used in the development of the IEP.

The parent responses did provide insight into areas where the school could give further attention. Specifically, parent comments indicate a desire to have student engagement with non-disabled peers (3 of the 7 parents reported they were only partially satisfied.) Comparable responses were recorded on the parents' belief about their child feeling safe and secure in school and the extent of parent involvement in behavioral interventions, strategies and supports provided to their child.

SUMMARY OF FINDINGS FROM THE THREE FOCUS AREAS OF THE CASE STUDY COMPLIANCE REVIEW

Access To The General Curriculum

Implementation of IEPs

Provision of Non-Academic Services

Full Access to the District's Curriculum

Equal Education Opportunity

Currently Pine Haven Boys Center does not meet the curriculum requirements that insure equal educational opportunities and full access to minimum state standards for presentation of curricula in grades 1-8. This is evident in the following:

- The existing written curriculum is not current, and is not aligned to the 2006 NH Grade Level Expectations.
- The written curriculum, as it exists, is not used to guide instruction, assessment, and writing of IEPs.
- The Science and Social Studies instruction, while offered in limited scope, is driven by individual teacher interest/skills, and does not appear to be based upon any conventional curriculum or supervised by content certified consultants.
- An elementary course of Studies across all academic disciplines is not available.
- The students enrolled in middle school classrooms do not have full access to curriculum requirements as outlined in minimum state standards.
- There are several teachers who are not certified and do not hold intern licenses for the curriculum area in which they are teaching (music, physical education or middle school required content certification).
- The two IEPs presented in the Case Study presentations varied in quality and content. Throughout, IEPs were not connected to the curriculum, goals were not measurable and monitoring of student progress was difficult to document when goals were not measurable.

Transition

Transition Planning

Process: Provision of FAPE

Transition Services

Transition planning, as outlined by IDEA and state special education rules, is not a requirement for elementary school children, unless they are age 14. However, because of the complex student population at Pine Haven, transition planning is critical and does not consistently occur. Although there were examples of exemplary planning, there was evidence that planning is not always documented. Based on the case study presentations provided by Pine Haven staff, it was evident that staff and administration recognize the importance of transitioning planning. As such, this is not clearly elaborated in the IEPs nor are there any written transition processes or guidelines available for staff, parents, LEAs and other related agencies (DJJS, DCYF, etc.). As noted above, transition planning is a critical area for students placed outside of their home district, and in particular, those who have been court placed. Case Study presentations lacked well documented collaboration between LEAs and outside agencies, as well as transition processes upon admission and discharge to the school. Informal processes are in place at Pine Haven, and handbooks reference discharge planning that empowers parents to make certain that support services are in place. However, there is a critical need to document and measure the success of transition processes.

Behavior Strategies and Discipline

The Pine Haven Boys Center written policy/procedures related to behavior strategies and discipline vary in the several manuals that were provided as documentation for the NHDOE Case Study Compliance Review Process. A range of descriptions were submitted and reviewed which included The Pine Haven Center Handbook, The Pine Haven Student Manual, and The Pine Haven Family Manual. Only one of the documents was dated, (the Family Manual, dated 2/2000), the others had no date, or evidence that there has been regular and ongoing review for revision and compliance with state and federal special education rules and regulations, or that the manuals have been reviewed and adopted by the board of directors. One document, The Pine Haven Boys Center Family Manual, speaks to restriction of privileges, time out and isolation; The Pine Haven Boys Center Student Manual refers to positive reinforcement, daily point systems, time out and seclusion, with a definition of seclusion as follows: "involuntarily confining a child in a seclusion room or area designated specifically for confining a child in a safe, separate space, for de-escalation of the child's negative behavior.

At Pine Haven, such areas are the cottage's padded rooms." All manuals indicate that physical restraint will be used to prevent a student from harming himself/others and from destroying property. However, none of the documents submitted demonstrate the protocol to include levels of positive intervention for physical restraint. The existing policy and procedures do not adhere to current special education rules and regulations as related behavioral interventions.

The observations of the visiting team presented concerns with policies and procedures for Pine Haven. The importance of updating the policies and procedures was emphasized, as was the necessity of having them published consistently in all manuals and publications which speak to the regulatory aspects of the school. Concern was also expressed regarding the use of floor restraints and the padded seclusion room. Foremost, is the need to be mindful of injury to the student in either circumstance. This brings forward the relative degree of emphasis and importance to the need for immediate attention to address these issues, and to further explore whether or not academic expectations and instruction in classrooms are being impacted by student behaviors, as well as the existing behavior management strategies currently being implemented.

Specifically, it was observed that classtime was regularly compromised by behavior management, especially when behavior requires removal from group settings. An imposed system of positive interventions, rather than consequences of removal from class and physical interventions, might better balance behavior management and academic expectations which could well advance student learning and engagement.

NEW PROGRAMS SEEKING APPROVAL FROM THE NHDOE, BUREAU OF SPECIAL EDUCATION

On January 21, 2009, Pine Haven Boys Center submitted a NHDOE Special Education Program Approval application seeking approval from the Bureau of Special Education to accept and enroll male students who were identified as speech and language impaired, as well as students identified as having multiple disabilities and those identified as autistic. As part of the March 2009 Case Study Compliance Review, this application was reviewed and discussed with the administration, and it was determined that the special education programming at Pine Haven Boys Center is not designed to meet the needs of students diagnosed with autism, nor would the school be able to accommodate students identified as having multiple disabilities. Based on the Case Study Compliance Review, and the application materials submitted, it was agreed that Pine Haven Boys Center does have sufficient supports and services to provide programming to students who have been identified as having speech and language disabilities.

COMMENDATIONS

The Pine Haven administration, faculty and staff are commended for their hard-working attention to the preparations for the Case Study Compliance Review, which was approached as a constructive opportunity to reflect upon the scope, relevance and strengths of their overall behavioral and academic programs and interventions. This was most evident in the hospitality and proactive stance throughout the two day visit for a well informed and high caliber visitation team. The visitation team noted several commendations, to include:

- The dedication of the Pine Haven staff to a challenging student population
- The attention to the family component of the therapeutic aspect of the individual student growth and development
- The efforts to develop a mutually beneficial partnership with LEAs
- The favorable staff/student ratio

ISSUES OF SIGNIFICANCE

Issues of significance are defined as systemic deficiencies that impact the effective delivery of services to all students, including those with educational disabilities. Examples of such may include system wide issues related to curriculum, instruction and assessment. Other examples might be concerns related to inadequate facilities, ineffective communication systems within the educational community, leadership, shared mission, vision and goals, deficiencies in policies and procedures, staff recruitment and retention, professional development or other important factors related to the learning organization.

While there were many praiseworthy strategies and interventions identified during the March 2009 NHDOE Case Study Compliance Review at Pine Haven, the visiting team identified several issues of significance, some of which are newly identified, while others are issues that have historically been previously identified.

As the visiting team worked in collaboration with the Pine Haven staff and administration, several issues of significance surfaced; all of which warrant immediate attention.

Ed 1114.05 (g) Program Requirements

Ed 1113.08 Curricula

CFR 300.320 (a) (1) (i)

A substantial issue for Pine Haven Boys Center is the need for the establishment of a viable curriculum to guide instruction, and the assessment tools to measure the performance and achievement of students. This is also critical to the notation of curricular goals and competencies in the IEPs. This must be strategically approached in regard to the scope and expanse of curricular offerings as required by NHDOE Standards for Private Facilities. The visiting team observed classrooms that were composed of multiple grade levels, with little to no differentiation in instruction for varied grade level curriculum expectations, nor were there full curriculum offerings for the multi-grade level settings. Accordingly, there was no measure of assurance that GLEs were being met, as they apply to grade level curriculum standards as required by the NHDOE. Further, during the NHDOE Case Study Visitation, the written curriculum was reviewed and was absent the required content for elementary and middle school curriculum offerings. The current Pine Haven School curriculum was not aligned with 2006 Grade Level Expectations. Also, the faculty and staff were not consistently utilizing the written curriculum to guide daily instruction.

Ed 1114.05 (c) Program Requirements

Ed 1109.05 IEPs for Children Placed in Private Providers of Special Education or other non-LEA Programs by Public Agencies.

CFR 300.320 Content of IEP

The IEPs reviewed varied in quality and content. The Pine Haven staff must ensure that all IEPs being implemented meet compliance, which includes working with the IEP team to ensure that annual measurable goals are included. Two of the IEPs reviewed lacked measurable annual goals.

Ed 1114.05 (g) (j) Program Requirements, Equal Educational Opportunities / Full Access to the General Curriculum

Ed 1114.10 Qualifications and Requirements for Instructional, Administrative and Support Personnel

Pine Haven Boys Center needs to give immediate attention to this requirement. Clearly, students need to have full access to elementary and middle school requirements. The established curriculum must have a direct connection to either in-house certified staff or certified consultants for each of the curricular requirements in accordance with Ed 1114.05 and Ed 1114.10. At the time of the visitation to Pine Haven Boys Center, the music teacher was not certified and the physical education teachers were not certified. In addition, Pine Haven does not provide full access to the general curriculum for students who are enrolled at the middle school level.

Ed 1114.06 (g) Responsibilities of Private Providers of Special Education or Other Non-Public LEA Programs in the Implementation of IEPs

Pine Haven must develop a mechanism for insuring progress for each child with documentation in their IEP, to include indices of progress in the curriculum and related outcomes for the child. Systems must be put in place that demonstrate that IEP goals and objectives are regularly assessed using a variety of criterion-based or normed-based methodologies related to the curriculum and annual measurable goals. The aim should be to present achievement and performance data that is comparable to other educational settings to which a student may transition.

Ed 1114.07 Behavioral Interventions

Although there are extensive policies and documentation on behavioral management, these are not updated and do not meet requirements of both state and federal rules and regulations. It is also not clear as to the procedure for documentation of individual professional or support personnel meeting the competencies expected in terms of acceptable child management techniques. This is specific to the apparent levels of intervention and the documentation of eligibility for intervention at different levels in this continuum.

**CITATIONS OF NONCOMPLIANCE IDENTIFIED AS A RESULT OF THE
MARCH 5-6, 2009 CASE STUDY COMPLIANCE REVIEW**

Citations of noncompliance are defined as deficiencies that have been identified through the Case Study Compliance Review Process, which are in violation of state and federal special education rules and regulations. Citations of non-compliance may result from review of policies and procedures and related application materials, case study presentations, review of student records or any other program approval activity related to the visit. **It is important to note that all citations of non-compliance listed below must be addressed in a corrective action plan and resolved within one year of this report. A template and instructions for such planning will be provided.**

CHILD SPECIFIC CITATIONS TO BE ADDRESSED BY BOTH THE LEA AND PRIVATE SCHOOL SETTING:

Ed 1109.01 Elements of an IEP
CFR 300.320 Content of IEP
Responsible LEA (SAU 60) Fall Mt. School District
Responsible LEA (SAU29) Keene School District.

Both IEPs lacked measurable goals.

SYSTEMIC/PROGRAM SPECIFIC CITATIONS TO BE ADDRESSED BY THE PRIVATE SCHOOL SETTING:

Ed 1114.05 (c) Program Requirements
Ed 1109.05 IEPs for Children Placed in Private Providers of Special Education or other non-LEA Programs by Public Agencies.
CFR 300.320 Content of IEP

Ed 1114.06 Responsibilities of Private Providers of Special Education or Other Non-LEA Programs in the Implementation of IEPs

Pine Haven Boys Center must ensure that prior to enrollment the sending LEA shall provide an IEP that meets all requirements as outlined in ED 1109. IEPs at Pine Haven must consistently be written with measurable goals.

Ed 1114.06 (g) Responsibilities of Private Providers of Special Education or Other Non-Public LEA Programs in the Implementation of IEPs

Pine Haven Boys Center must maintain progress information on each child with a disability on an ongoing basis. Currently, staff is dependent upon utilizing anecdotal information, and work samples to document student progress. IEP goals are not measurable or related to the curriculum or assessment data, therefore IEP progress is not able to be measured.

Ed 1114.05 (g) (j) Program Requirements, Equal Educational Opportunities / Full Access to the General Curriculum

Ed 1114.10 Qualifications and Requirements for Instructional, Administrative and Support Personnel

Students enrolled at Pine Haven must have full access to the curricular standards established for NH schools and school districts, and have certified staff and or consultants providing oversight to course offerings/instruction. Pine Haven Boys Center must demonstrate that there is a viable curriculum at both the elementary and middle school levels, which meets all of the NH Curriculum Requirements, and that there are certified staff or consultants available to implement the curriculum.

Ed 1114.10 Qualifications and Requirements for Instructional, Administrative and Support Personnel

At the time of the visit all classroom teachers and the principal held current NH certification. However, these special educators are responsible for teaching all of the required content as outlined in the NH Minimum State Standards and do not benefit from supervision or consultation with educators who hold appropriate certification in academic content areas; this is especially significant at the middle school level. It was also noted that the physical education staff and music educator hold no teaching certificates. Pine Haven Boys Center must ensure that all administrative, instructional and related service staff holds appropriate certification or licensure for the position in which they function as required by the state of NH and other licensing entities.

Ed 1114.07 Behavioral Interventions

Based on the March 2009 visitation to Pine Haven Boys Center and review of the submission of various handbooks and manuals, the school needs to review and revise current behavior management policy and procedures to ensure that all are in compliance with both state and federal special education rules and regulations. In addition, attention needs to be given to ensuring that IEPs reflect such documentation as related to behavior plans, and monitoring of student progress.

Ed 1114.03 (c) Governance

The governing board of Pine Haven Boys Center must ensure that the program is in compliance with all state, federal and local laws concerning the education of children with disabilities, including IDEA and RSA 186-C. At the time of the March 2009 NHDOE visitation to Pine Haven Boys Center, multiple citations of non-compliance were identified. All of the policy and procedures at Pine Haven Boys Center need comprehensive review to ensure compliance.

Ed 1114.05 (f) Program Requirements

Pine Haven Boys Center shall not accept any students with disabilities for which the program is not approved. At the time of the March 2009 visitation to Pine Haven Boys Center, there was one student identified as having multiple disabilities, and Pine Haven is not approved to serve this disability category.

Ed 1114.06 (f) Responsibilities of Private Providers of Special Education or Other Non-LEA Programs in the Implementation of IEPs

Pine Haven Boys Center must have a process in place to ensure that lesson plans are clear, concise, and reflective of IEP goals. At the time of the March 2009 visitation to Pine Haven Boys Center, there was not sufficient evidence of processes in place that would demonstrate compliance.

Ed 1114.10 (c) Qualifications and Requirements of Instruction, Administrative and Support Personnel

Pine Haven Boys Center currently has written procedures for the supervision and evaluation of education staff, which are not consistently implemented. Further, upon review of the teacher supervision and evaluation model, it was evident that it was dated, and not aligned with the written master professional development plan in accordance with ED500 certification standards for educational personnel in New Hampshire. Significant attention must be directed toward quality teacher supervision and evaluation and the direct connection with curriculum, instruction and assessment.

SUGGESTIONS FOR PROGRAM-WIDE IMPROVEMENT

Suggestions for improvement, simply stated, are recommendations provided by the visiting team that are intended to strengthen and enhance programs, services, instruction and professional development, and the NHDOE strongly encourages that serious consideration be given to the suggestions. However, discretion may be used in this area; suggestions for improvement are not considered to be required corrective actions and you may determine which suggestions most warrant follow up and address those in your corrective action plan. System wide suggestions for improvement are listed below. Additional suggestions may be found in the next section of the report. It should be noted that in the Building Level Data Summary Report (next section), any suggestion made by a visiting team member that is actually a citation of noncompliance, has an asterisk (*) before it, and it is also listed above with the citations of noncompliance.

1. Pine Haven Boys Center will well serve their student population by bringing a renewed focus upon the curriculum and assessment strategies employed at the school. Although there is recognition of the array of teacher driven instruction and the interventions required in addressing the behavioral and emotional needs of the student population, this does not preclude the necessity to provide a high standard of instruction and assessments in the required disciplines and curriculum requirements for both elementary and middle school children.
2. The behavioral program and interventions at Pine Haven Boys Center have been in place for a substantial period of time and warrant a review in light of the changing dynamics of behavioral intervention strategies in the field.

Specifically, the provisions for focus upon student strengths, positive interventions and resiliency in meeting with significant needs of a very challenging student population.

3. The attention to strengthening the academic culture must include focused time for teacher planning and consultation beyond that presently available. Such topics as interdisciplinary studies, applied learning and student performance targets would be beneficial for collective discussion and planning.
4. Based on the March 2009 visitation to Pine Haven Boys Center, it was clear that the formal procedure for the evaluation and supervision of teachers is flawed. While well intentioned, the model is not directed toward assisting teachers in improving their practice, and is characterized by an administrator conducting an observation, taking notes and providing feedback. This procedure has not been reviewed since it was developed and has not been consistently implemented or documented. It is strongly suggested that Pine Haven Boys Center reform and restructure the teacher evaluation system based on a serious review of the literature and research on the importance of teacher evaluation and connection to student learning.
5. Pine Haven Boys Center would benefit from a guided strategic planning process that would be goal and performance based and which may open other avenues for outreach and program development for the student population they serve.
6. Given the unique student population and the instructional challenges for the staff at Pine Haven, it will be critical that professional development be an integral part of a deliberately developed continuous improvement effort. The charge to Pine Haven Boys Center is to have teachers participate more actively in exposure to new ideas, innovations, and encourage them to bring professional learning back to the classroom.

VI. BUILDING LEVEL SUMMARY REPORTS

USING COMPLIANCE DATA FOR CONTINUOUS IMPROVEMENT

BUILDING LEVEL CASE STUDY DATA SUMMARY

NEW HAMPSHIRE DEPARTMENT OF EDUCATION SPECIAL EDUCATION PROGRAM APPROVAL AND IMPROVEMENT PROCESS

School: Pine Haven Boys Center

Date: 3/5-6, 2009

Programs:

Number of Cases Reviewed: 2

Recorder/Summarizer: Gretchen Cook

Name: Maureen Lee	<u>Building Level</u> or Visiting
Name: Paul Riva	<u>Building Level</u> or Visiting
Name: Amy Kurz	<u>Building Level</u> or Visiting
Name: Janice Godzyk	<u>Building Level</u> or Visiting
Name: Barbara Girard	<u>Building Level</u> or Visiting
Name: Jean Strollo	<u>Building Level</u> or Visiting
Name: Mike Maroni	<u>Building Level</u> or Visiting
Name: Eric Schroeder	Building Level or <u>Visiting</u>
Name: Jane Bergeron-Beaulieu	Building Level or <u>Visiting</u>

Based on data collected from the Data Collection Forms, Interview Forms, Classroom Observations, etc. the following summary is intended to provide a “snapshot” of the quality of services and programs in the school in the areas of: **Access to the General Curriculum, Transition and Behavior Strategies and Discipline.**

SUMMARY OF BUILDING LEVEL DATA

ACCESS TO THE GENERAL CURRICULUM STATEMENTS					Filled in with the combined number of times a statement is marked on all Data Collection Forms for this school or building					
<u>Ed. 1109.01 Elements of an IEP CFR 300.320 Content of IEP</u> <u>Ed. 1109.05, Implementation of IEP 20 U.S.C. 1414 (d)</u> <u>Ed. 1115.07, Ed 1119.01(f) Provision of Non-Academic Services/Settings</u> <u>CFR 300.320(a) CFR 300.34 Ed. 1113.08, Full Access to District's Curricula</u> <u>Ed. 1113.13, Diplomas</u> <u>Ed. 1107.04 (d) Qualified Examiner</u> <u>Ed. 1109.01 CFR 300.320 Program Requirements, Content of IEP</u> <u>Ed. 1119 Protections Afforded to Children with Disabilities</u> <u>CFR 300.320(a)(1)(i)</u> "... general curriculum (i.e. ,the same curriculum as for nondisabled children)" <u>CFR 300.320(a)(4)(iii)</u> "To be educated and participate with other children with disabilities and non disabled children"					YES	NO	N/A			
A1.) Team uses multiple measures to design, implement and monitor the student's program.					2					
A2.) All IEP goals are written in measurable terms.						2				
A3.) Student has made progress over the past three years in IEP goals. Goal 1						2				
A4.) Student has made progress over the past three years in IEP goals. Goal 2					1	1				
A5.) Student <u>has access to</u> the general curriculum (as outlined by the district, sending district or NH frameworks.)						2				
A6.) Student <u>participates in</u> the general curriculum <u>in a regular education setting with non-disabled peers</u> , as appropriate, with necessary supports.						2				
A7.) When participating in a regular education setting with non-disabled peers with necessary supports, student <u>has made progress in</u> the general curriculum.						2				
A8.) Student <u>participates</u> appropriately in state, district and school-wide assessments.							2			
A9.) Student <u>shows progress</u> in state, district and school-wide assessments.					2					
A10.) Student <u>has opportunities</u> to participate in general extracurricular and other non-academic activities with necessary supports.					2					
A11.) Student <u>does participate</u> in general extracurricular and other non-academic activities with necessary supports.					2					
A12.) Was the student's most recent individual evaluation (initial or reevaluation), including a written summary report and meeting, held within 45 days of parental permission to test? If not, was it due to: (check all that apply)					2					
a.) Extension in Place	b.) Lack of Qualified Personnel ___Psychologist ___Educator ___Related Services ___Other	c.) Evaluation Not Completed in Time	d.) Summary Report Not Written in Time	e.) Meeting Not Held in Time	f.) Other					
For High School Students:					YES	NO				
A13.) Student is earning credits toward a regular high school diploma.										
A14.) <i>IF YES:</i> within 4 years?										
A15.) Student will earn an IEP diploma or a certificate of competency.										
A16.) <i>IF YES:</i> within 4 years?										
A17.) Does this school have a clear policy for earning a high school diploma?										

Access Strengths	Access Suggestions for Improvement
<ol style="list-style-type: none"> 1. Pine Haven has strong focus on development of basic math, reading and writing skills. 2. Teachers are actively working to incorporate the curriculum into lesson planning. 3. Staff reports multiple measures to assess student progress. 4. Uses of resources such as NECAP practice tests are recognized. 5. There is strong individualized instruction in the classroom. 6. Predictability of academic routines is evident. 7. Measureable objectives/benchmarks in IEPs are evident. 8. Teachers demonstrate willingness to learn and try new things and develop professional skills. 	<ol style="list-style-type: none"> 1. Increased use of mini measures (e.g. DIBELS) is recommended. 2. Consider new models for progress reporting. 3. Look at collaboration/linkages between classroom and related services and other service providers. Currently, service providers are isolated from curriculum offerings. 4. Consider options for instructional changes in schedule/personnel use team teaching. 5. In the area of technology there is a need to activate the use of library resources and integration with classrooms. 6. Literacy needs to be visual-word walls, writing process posted, etc. <ul style="list-style-type: none"> ▪ Consider school wide literacy ▪ Consider school wide math 7. Suggest increased time for content area instruction: Creative planned integration between reading, writing and content areas.

SUMMARY OF BUILDING LEVEL DATA

<u>TRANSITION STATEMENTS</u>		Filled in with the combined <u>number</u> of times a statement is marked on all Data Collection Forms for this school or building		
		YES	NO	
<u>Ed .1102 Transition Services CFR 300.43</u> <u>Ed. 1106 Process: Provision of FAPE CFR 300.124 Part C Transition</u> <u>Ed. 1109.01 Elements of an IEP (Transition Services)</u> <u>CFR 300.320(a)(7)(b) 20 U.S.C. 1402 (34)</u> <u>20 U.S.C. 1414 (d)(1)(A) and (d)(6)</u> <u>Ed. 1103 IEP Team CFR 300.320(b)</u> This includes movement from (a) Early Supports and Services (ESS) to preschool, (b) preschool to elementary school, or (c) age 16 or older, as well as from grade to grade and school to school.				
T1.)	Transition planning from grade to grade takes place.	2		
T2.)	Transition planning from school to school takes place.	2		
T3.)	Collaboration has occurred between general and special education staff in IEP development and in transition planning.	2		
T4.)	For a student who will turn age 14 during the IEP service period (or younger if determined appropriate by the IEP team,) does the IEP include a statement of the transition service needs that focuses on the student's course of study, such as participation in advanced-placement courses or a vocational education program? Ed 1109.01 (10)			
For students under age 16, answer only the first 4 statements above. Then skip to the next page. If the student is age 16 or older during the course of the IEP, answer all statements on this page.				
T5.)	Transition planning is designed as a results oriented process that promotes movement from school to the student's desired post-school goals.			
T6.)	IEP team includes parent as part of transition planning.			
T7.)	IEP team and process includes student as part of transition planning.			
T8.)	IEP includes current level of performance related to transition services.			
T9.)	There is documentation that the student has been invited to attend IEP meetings.			
T10.)	A statement of the transition service needs is included in the IEP.			
T11.)	The statement of transition service needs focuses on the student's course of study (e.g. vocational programming, advanced placement).			
T12.)	Transition plan includes coordinated, measurable, annual IEP goals and includes transition services that will reasonably enable the student to meet the post-secondary goals. (required data for federal statistics purposes)			
T13.)	Statement of needed transition services is presented as a coordinated set of activities.			
T14.)	The IEP includes a statement of needed transition services and considers instruction.			
T15.)	The IEP includes a statement of needed transition services and considers community experiences.			
T16.)	The IEP includes a statement of needed transition services and considers development of employment skills.			
T17.)	Student is informed prior to age 17 of his/her rights under IDEA.			
Only the following 4 statements may be answered N/A if appropriate. All statements above must be answered Yes or No.		YES	NO	N/A
T18.)	There is documentation that representatives of other agencies have been invited to IEP meetings.			
T19.)	The IEP includes a statement of needed transition services and considers related services.			
T20.)	The IEP includes a statement of needed transition services and considers development of daily living skills.			
T21.)	If the student is preparing to graduate this year, there is a summary of the student's academic achievement and functional performance , which includes recommendations on how to assist the student in meeting his or her post-secondary goals.			

Transition Strengths	Transition Suggestions for Improvement
<ol style="list-style-type: none"> 1. Communication among staff, class to class, school to residence is strong. 2. All staff read/are familiar with the documents that arrive with each child. 3. There is evidence of pre-vocational discussions for students at middle school level. 	<ol style="list-style-type: none"> 1. Offer consultation to districts; this may require relationship building with districts. (Perhaps call back after 4 weeks) 2. Assist parents on how they may better advocate for their child in Transition Planning.

SUMMARY OF BUILDING LEVEL DATA

BEHAVIOR STRATEGIES AND DISCIPLINE		Filled in with the combined number of times a statement is marked on all Data Collection Forms for this school or building		
<u>Ed. 1109 Program</u> <u>CFR 300.324</u> <u>Ed. 1124 Disciplinary Procedures</u> <u>CFR 300.530-300.536</u> <u>20 U.S.C. 1415 (K)</u> <u>Child Management – Private Schools</u> <u>RSA 169-C Child Protection Act</u>		YES	NO	N/A
B1.) Data are used to determine impact of student behavior on his/her learning.		2		
B2.) Has this student ever been suspended from school?			2	
B3.) If yes, for how many days?				
B4.) If appropriate, a functional behavior assessment has been conducted.		2		
B5.) IEP team has addressed behaviors that are impacting student learning.		2		
B6.) A behavior intervention plan has been written to address behaviors.		2		
B7.) All individuals working with the student have been involved in developing behavior intervention strategies.		2		
B8.) Specialized training for implementing interventions, strategies and supports has been provided to parents, providers and others as appropriate.		2		
B9.) Results of behavior intervention strategies are evaluated and monitored.		2		
B10.) A school-wide behavior intervention model exists.		2		
Behavior Strategy Strengths	Behavior Strategy Suggestions for Improvement			
<ol style="list-style-type: none"> 1. Staff are willing to individualize behavior management plans to meet the needs of the student population. 2. Students report that they are clear on behavioral expectations and consequences for infractions. 	Pine Haven may want to consider a review of existing disciplinary practices and discuss the possibility of utilizing more positive interventions rather than focus upon consequences for negative behavior.			

Summary of Building Level Strengths and Suggestions

Strengths	Suggestions for Improvement
<ol style="list-style-type: none"> 1. Pine Haven offers a supportive atmosphere for students. 2. The school is quiet and well managed. 3. Staff are clear about programs offered. 4. There is evidence of increasing use of data by staff to inform decisions regarding student behaviors. 5. Teachers have positive relationships and work as a team. 6. Teachers are aware of behavior management techniques. 	<ol style="list-style-type: none"> 1. *Update of policies and procedures is needed. 2. Positive statements for cues and “rules” are suggested.