

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

**Crotched Mountain School
SUMMARY REPORT**

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William H. Cossaboon, Principal/ Director of Special Education**

Chairpersons, Visiting Team:
Kathryn Skoglund and Diane Lurvey
Education Consultants

Site Visit Conducted on February 12-13, 2013
Report Date: June 12, 2013

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I. TEAM MEMBERS

Visiting Team Members:

| NAME | PROFESSIONAL ROLE |
|---|--|
| Chairpersons: Kathryn Skoglund Diane Lurvey | Educational Consultant Education Consultant |
| Betsy Fowler Patricia Hicks | Special Education Coordinator Co-Head of School/Director of Special Education |
| Mary Lane Michael O'Hara Danielle Paranto | Educational Consultant, NHDOE Director of Special Education Executive Director |

Building Level Team Members from Crotched Mountain School:

| NAME | PROFESSIONAL ROLE |
|-------------------|------------------------------------|
| Ashlee Crouthamel | Special education teacher |
| Gwen Rumberg | Occupational Therapist |
| Keith Wolsiefer | Physical Therapist |
| Kelsey Shannon | Speech Therapist |
| Eileen Ahern | Psychologist |
| Deborah Segedy | Student service coordinator |
| Penny Crandell | Science teacher |
| Don Tilton | Adapted physical education teacher |
| Bonnie Arpin | Music teacher |
| Eric Peterson | Art teacher |
| Ami O'Keefe | Special education teacher |
| Karen Hoffman | Speech/Language Pathologist |
| Jill Thompson | Occupational Therapist |
| Don Crooker | Student service coordinator |
| Andra Hall | Special education teacher |
| Tim Hougue | Community work coordinator |
| Christy Greene | School social worker |
| Cynthia Medeiros | Computer/technology coordinator |

II. INTRODUCTION

Crotched Mountain Rehabilitation Center is a private, non-profit organization dedicated to serving individuals with disabilities and their families, embracing personal choice and development, and building communities of mutual support. The Mission of the school at Crotched Mountain is to provide an optimal educational experience to students age 4-21, furthering their educational effort by providing state-of-the-art assistance for their individual needs.

Crotched Mountain is approved for 95 students and is currently serving 94. All students are involved in the education program which is approved as a year round program. Other programs available to the students are residential and medical. Approximately 26 students come to the day program from surrounding communities. While the majority of students are from districts in New Hampshire, there are also students from Massachusetts, New York, Maine, Connecticut, Vermont, New Jersey, and Virginia.

SCHOOL PROFILE

| SCHOOL DEMOGRAPHICS | 2011-2012 | 2012-2013 |
|---|--------------------------------|---------------|
| Student Enrollment as of October 1 | 96 | 91 |
| Do you accept out-of-state students? If so, list number from each state in 12-13 | yes | |
| Number and Names of Sending New Hampshire LEAs (as of October 1, 2012) | CT-1, NY-17, VT-8, MA-20, PA-2 | |
| # of Identified Students Suspended One or More Times | 0 | 2 – in school |
| Average Length of Stay for Students | 3.3 years | 4.1 years |
| <u>STAFF DEMOGRAPHICS</u> | | |
| Student/Teacher Ratio (as of October 1, 2012) | 4:1 | 4:1 |
| # of Certified Administrators | 1 | 1 |
| # of Certified Teachers | 22 | 23 |
| # of Teachers with Intern Licenses | 4 | 3 |
| # of Related Service Providers | 24 | 23 |
| # of Paraprofessionals | 88 | 78 |
| # of Professional Days Made Available to Staff | 3 | 3 |

Please complete the table below, listing the number of students in each category.

| SPECIAL EDUCATION PROGRAM DATA | | |
|---|------------------|------------------|
| <u>Primary Disability Types:</u> | 2011-2012 | 2012-2013 |
| Autism | 48 | 41 |
| Deaf / Blindness | 1 | 1 |
| Deafness | 0 | 1 |
| Developmental Delay | 1 | 1 |
| Emotional Disturbance | 12 | 8 |
| Hearing Impairment | 9 | 2 |
| Intellectual Disability | 12 | 7 |
| Multiple Disabilities | 0 | 9 |

| | | |
|--------------------------------|----|----|
| Orthopedic Impairment | 0 | 0 |
| Other Health Impairment | 30 | 20 |
| Specific Learning Disabilities | 0 | 0 |
| Speech or Language Impairment | 0 | 0 |
| Traumatic Brain Injury | 3 | 30 |
| Visual Impairment | 0 | 0 |

III. 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 Crotched Mountain School on February 12-13, 2013 for the purpose of reviewing the present status of programs and services made available to children and youth with educational disabilities. Program Approval Visits are conducted using a Case Study Model that is a focused review. This focused review permits the NHDOE to leverage its impact for change and improvement within private special education schools statewide, by focusing the attention of all educators on the following three areas of critical importance in the provision of FAPE for students with disabilities.

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

As part of this compliance review, students were randomly selected by the NHDOE prior to the visit, and staff was asked to present these students' case studies at the visit to determine compliance with state and federal special education rules and regulations.

Other activities related to this NHDOE Case Study Compliance Visit included the review of:

- ♦ All application materials submitted
- ♦ Status of corrective actions since the last NHDOE Special Education Program Approval Visit
- ♦ Personnel credentials for special education staff (verified by NHDOE)
- ♦ Program descriptions and NHSEIS verification reports
- ♦ All data collected during the visit
- ♦ Any new or changed special education programs seeking approval from the NHDOE: No program changes have been requested.

The New Hampshire Department of Education provided a visiting team of professional educators to work collaboratively with staff in each of the schools in conducting the Case Study Compliance Review and the varied data collection activities. Throughout the entire review process, the visiting team worked in collaboration with the staff of Crotched Mountain School. Their professionalism, active involvement in the process and cooperation were greatly appreciated and well recognized.

Evidence of the work conducted and results related to student outcomes were gathered throughout the process, guided by the materials and templates provided by the NHDOE, Bureau of Special Education. Examples of evidence included student individual education programs (IEPs), progress reports, samples of student work, grades, extracurricular involvement, permanent records, curriculum, etc. Input was gathered from key constituents, including interviews with professional staff, parents,

administrators, and in some cases the students. In addition, classroom observations were conducted for each of the case studies being reviewed. The collective data were summarized by the visiting and building level teams. The summaries, included in the following pages, outline identified areas of strength and areas needing improvement for each school reviewed.

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

Based on review of the July 20, 2010 NHDOE Special Education Program Approval Report, the following patterns were identified as needing improvement:

| Findings of Noncompliance | Status as of June 15, 2011 | Status as of February 12-13, 2013 |
|--|-----------------------------------|--|
| ED1114.05(j): Required content areas/certified Staff(or Consultants) for required areas | MET | MET |
| ED 306.15 Certified Staff or Consultants | MET | MET |
| Ed 1109.01(a) CFR 300.320 Contents of an IEP | MET | MET |
| ED 1107.01(a)/34 CFR 300.305(a-d) Re-evaluation requirements | MET | MET |

V. FEBRUARY 12- 13, 2013 CASE STUDY COMPLIANCE REVIEW RESULTS

Data collection is an important part of the NHDOE Special Education Case Study Compliance Review Process. In order to monitor whether or not special education programs are in compliance in the three focus areas, and determine any root causes of problems that may be identified through the case study process, it is essential that each case study team look deeply into the data that surrounds the three primary aspects of the Case Study Review. This process takes time, and the entire team working with the child being reviewed must be involved in collecting and analyzing the data, as well as presenting and summarizing the data with the visiting team. As such, NHDOE works with private schools to determine the number and type of case studies to be prepared and presented, and to ensure that building teams are not inundated with more data than can be fully analyzed, allowing them to reflect upon and generalize their newly found knowledge of their programs, practices, policies and procedures.

The case study review at Crotched Mountain School (CMS) looked at three students in order to get a full perspective on students' access to curriculum, transition planning, and behavior management. The students reflected a range of ages, genders, disabilities, and services. The first student, age 8 and in the second grade is identified with multiple disabilities and behavioral issues. He has been at CMS since 2011. The second student, age 14 and in the sixth grade, is identified as Deaf/Blind and Other Health Impaired. She has been at CMS since 2012 and a new IEP is in the works pending re-evaluations. The final case study involved a 17-year old male in the eleventh grade diagnosed with Intellectual

Disability, Attention Deficit/Hyperactivity Disorder, and Oppositional Defiant Disorder. This student participates in a range of activities at CMS including academic classes, vocational training and community work. Viewing CMS through the lens of these IEPs enabled the visiting team to view the full range of supports and services available at Crotched Mountain.

LEA SURVEYS

Private schools provide necessary options to New Hampshire students with educational disabilities. Effective partnerships with LEAs are an important part of establishing and implementing successful private special education programs that improve student outcomes. By surveying LEA perceptions of current program(s), private schools can self assess these relationships and determine if there are areas in need of improvement. To this end, Crotched Mountain School distributed the LEA Survey to the contact people in all LEAs that have students currently enrolled in the school. They received a 40% **response** from the LEAs.

Statistics from surveys sent by Crotched Mountain:

- 40 SAU's/LEA's were sent a two page survey to complete along with a stamped self-addressed envelope for return. 16 SAU's/LEA have returned their surveys. This is a 40% response rate.
- School Districts were asked to identify the grade level of their student:
Preschool =0 Elementary=1 Middle School=1 High School=7 Blank=8

Other Pertinent Information

- The grey cells are extra questions we asked of parents and school districts both in education and residential. These are not part of the NH DOE Survey.
- The original NH DOE survey had different response options for parents and school districts. This did not allow for a good comparison of agreement with the comments. You will note that both the school district and part/guardian survey have the same response options.

DISTRICT SURVEY RESULTS BY NUMBER OF RESPONSES

| School District- Area-Education | | Strongly Agree | Agree | Disagree | Strongly Disagree | NA | Blank |
|---------------------------------|---|----------------|-------|----------|-------------------|----|-------|
| 1 | The private school team has positive expectations for students | 3 | 8 | 3 | 0 | 0 | 2 |
| 2 | I am satisfied with the educational program at Crotched Mountain School | 2 | 9 | 4 | 0 | 0 | 1 |
| 3 | The school consistently follows special education rules and regulations | 1 | 12 | 1 | 0 | 0 | 2 |
| 4 | The school has an effective behavioral program (if applicable) | 1 | 10 | 5 | 0 | 0 | 0 |
| 5 | I am satisfied with the related services provided but the school | 0 | 12 | 3 | 0 | 0 | 1 |
| 6 | The school implements all parts do the students' IEP. | 0 | 12 | 4 | 0 | 0 | 0 |
| 7 | I feel the school provides the necessary skills to allow the student to make progress in the IEP goals. | 0 | 11 | 2 | 0 | 0 | 3 |
| 8 | The school program measures academic growth. | 0 | 12 | 0 | 2 | 0 | 2 |
| 9 | The school program measures behavioral growth (if applicable). | 0 | 12 | 0 | 2 | 0 | 2 |
| 10 | The school completes a minimum of 3 comprehensive reports per year on each child with a disability enrolled. | 2 | 13 | 0 | 0 | 0 | 1 |
| 11 | The 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. | 2 | 12 | 1 | 0 | 0 | 1 |
| 12 | Progress reports are provided to the LEA and to the parent of the child. | 2 | 11 | 2 | 0 | 0 | 1 |
| 13 | I am satisfied with the way the school communicates students' progress. | 2 | 11 | 0 | 0 | 0 | 3 |
| 14 | The school communicates effectively with the parent. | 4 | 10 | 2 | 0 | 0 | 0 |
| 15 | The school communicates effectively with the LEA. | 3 | 8 | 5 | 0 | 0 | 0 |

| | | | | | | | |
|----|--|---|---|---|---|---|---|
| 16 | The school involves parents in decision-making. | 4 | 8 | 4 | 0 | 0 | 0 |
| 17 | The school actively plans for future transition to a less restrictive placement. | 1 | 9 | 4 | 0 | 0 | 2 |

| | | | | | | | |
|--|--|-----------------------|--------------|-----------------|--------------------------|-----------|--------------|
| 18 | The therapeutic programs developed by the therapists at CMS are appropriate to meet my student's needs. (Therapeutic programs may include mealtime protocols, communication programs, behavior programs, range of motion programs, etc.) | 1 | 8 | 0 | 0 | 1 | 6 |
| 19 | Carryover of therapeutic programs, across environments, supports my student in order for him/her to meet his/her fullest potential. | 1 | 8 | 2 | 0 | 0 | 5 |
| 20 | If the school finds it necessary to change or terminate placement, the 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. | 0 | 8 | 0 | 0 | 6 | 2 |
| 21 | The team sets meeting time that are convenient for both parent and LEA. | 4 | 8 | 2 | 0 | 0 | 2 |
| 22 | The school has met my expectations. | 0 | 10 | 3 | 0 | 0 | 3 |
| 23 | I have a good relationship with the school. | 2 | 10 | 1 | 0 | 0 | 3 |
| 24 | I would enroll other students at the school. | 8 | 3 | 2 | 0 | 0 | 3 |
| School District- Area-Residential (Answer only of applicable) | | Strongly Agree | Agree | Disagree | Strongly Disagree | NA | Blank |
| 1 | The residential program at Crotched Mountain meets the needs of my student? | 2 | 4 | 1 | 0 | 0 | 0 |
| 2 | Residential supervisors, Student Service Coordinators and staff of my student's program listen to my concerns and provide me with support as well as timely, accurate information, | 1 | 5 | 1 | 0 | 1 | 0 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 3 | I can reach residential supervisors and support staff quickly and easily and they make themselves available. | 2 | 3 | 1 | 0 | 1 | 1 |
| 4 | The instructional programs at the residences meet the overall educational needs of my student. | 1 | 5 | 1 | 0 | 0 | 1 |
| 6 | Crotched Mountain residential staff work in a collaborative and cooperative manner with all parties involved in planning and providing services for my student. | 1 | 6 | 0 | 0 | 0 | 0 |
| 7 | Crotched Mountain residential staff exhibit professional behavior, and demeanor at all times. | 1 | 6 | 1 | 0 | 0 | 1 |
| 8 | I am satisfied with the 24 hour healthcare coverage provided at Crotched Mountain School. | 1 | 6 | 0 | 0 | 2 | 0 |

PARENT PARTICIPATION

One of the defining features 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 forth new ideas. In addition, including the parent perspective enhances and strengthens the teams' case study presentations, and makes for stronger school/parent relationships. As such, parent participation and input is a required part of the NHDOE Special Education Program Approval Process. 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. First, parents are encouraged to be active participants in the case study presentations; second, parents of the children presented in the case study process are formally interviewed; and third, the school is required to send all parents of students with disabilities a written survey with a request to respond. Below is a summary of the results of the parent survey, along with a summary of the comments/feedback provided to the visiting team during this Case Study Compliance Review.

Statistics collected by Crotched Mountain

- Date Survey Sent: September 27, 2012 return date of October 12, 2012.
- At the time of the survey, Crotched Mountain School had 91 students.
- Parent s/Guardians were sent a two page survey to complete along with a stamped self-addressed envelope for return. 13 Parents/Guardians returned their surveys. This is a 21% response rate.
- Parent were asked to identify the grade level of their child:
Preschool =0 Elementary=0 Middle School=0 High School=6 Blank=7

Other Pertinent Information

- The grey cells are extra questions we asked of parents and school districts both in education and residential. These are not part of the NH DOE Survey.
- The original NH DOE survey had different response options for parents and school districts. This did not allow for a good comparison of agreement with the comments. You will note that both the school district and part/guardian survey have the same response options.

PARENT SURVEY RESULTS BY NUMBER OF RESPONSES

| Parent-Area-Education | | Strongly Agree | Agree | Disagree | Strongly Disagree | NA | Blank |
|-----------------------|--|----------------|-------|----------|-------------------|----|-------|
| 1 | I am satisfied with my child's program and the supports that he/she receives. | 8 | 4 | 1 | 0 | 0 | 0 |
| 2 | My child has opportunities to interact with non-disabled peers on a regular basis. | 2 | 4 | 3 | 2 | 1 | 1 |
| 3 | I am adequately informed about my child's progress. | 6 | 5 | 2 | 0 | 0 | 0 |
| 4 | My child is informed about and encouraged to participate in school activities outside of the school day, and is offered necessary supports. | 3 | 5 | 1 | 1 | 3 | 0 |
| 5 | My child feels safe and secure in the school and welcomed by staff and students. | 8 | 4 | 1 | 0 | 0 | 0 |
| 6 | The team sets meeting time that are convenient for both myself and the LEA. | 7 | 3 | 1 | 1 | 0 | 1 |
| 7 | A variety of information (observations, test scores, school work, parent input) was used on developing my child's IEP. | 8 | 4 | 1 | 0 | 0 | 0 |
| 8 | The therapeutic programs developed by the therapists at CM are appropriate to meet my child's needs. (Therapeutic programs may include mealtime protocols, communication programs, behavior programs, range of motion programs, etc.) | 6 | 4 | 2 | 0 | 0 | 1 |

| | | | | | | | |
|----|---|---|---|---|---|---|---|
| 9 | Carryover of therapeutic programs, across environments, supports my child in order for him/her to meet his/her fullest potential. | 4 | 6 | 2 | 0 | 0 | 1 |
| 10 | I am satisfied with the nursing and medical care given to my child during school hours, including being informed of care provided? | 6 | 4 | 2 | 0 | 1 | 0 |
| 11 | I am satisfied with the progress my child is making toward his/her IEP goals. | 5 | 5 | 1 | 1 | 0 | 1 |
| 12 | The school program measures academic growth. | 4 | 7 | 1 | 1 | 0 | 0 |
| 13 | The school completes a minimum of 3 comprehensive reports per year on each child with a disability enrolled. | 6 | 4 | 1 | 0 | 1 | 1 |
| 14 | The 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. | 7 | 6 | 0 | 0 | 0 | 0 |
| 15 | Progress reports are provided to the LEA and to the parent of the child. | 7 | 5 | 1 | 0 | 0 | 0 |
| 16 | I am satisfied with the way the school communicates students' progress. | 8 | 3 | 0 | 0 | 0 | 2 |
| 17 | All of the people who are important to my child's transition were part of the planning. | 7 | 3 | 1 | 0 | 0 | 2 |
| 16 | I am satisfied with the written secondary transition plan that is in my child's IEP. | 5 | 5 | 3 | 0 | 0 | 0 |
| 19 | My child's classroom behaviors affect his/her ability to learn. | 6 | 5 | 2 | 0 | 0 | 0 |
| 20 | I have been involved in the development of behavior interventions strategies and supports for my child. | 5 | 8 | 0 | 0 | 0 | 0 |
| 21 | I am satisfied with the way the school is supporting my child's behavioral, social and developmental needs. | 5 | 6 | 0 | 0 | 0 | 2 |

| | | | | | | | |
|----|---|----|---|---|---|---|---|
| 22 | The school has an effective behavioral program (if applicable) | 5 | 6 | 1 | 0 | 0 | 1 |
| 23 | I fully participate in special education decisions regarding my child. | 7 | 5 | 1 | 0 | 0 | 0 |
| 24 | I have been provided with a copy of the procedural safeguards (parental rights) at least once a year, | 12 | 1 | | | | |

| Parent- Area-Residential (Answer only of applicable) | | Strongly Agree | Agree | Disagree | Strongly Disagree | NA | Blank |
|---|--|-----------------------|--------------|-----------------|--------------------------|-----------|--------------|
| 1 | The residential program at Crotoned Mountain meets the needs of my child? | 4 | 3 | 0 | 0 | 0 | 0 |
| 2 | Residential supervisors, Student Service Coordinators and staff of my child's program listen to my concerns and provide me with support as well as timely, accurate information, | 4 | 2 | 1 | 0 | 0 | 0 |
| 3 | I can reach residential supervisors and support staff quickly and easily and they make themselves available. | 4 | 3 | 0 | 0 | 0 | 0 |
| 4 | The instructional programs at the residences meet the overall educational needs of my child. | 4 | 1 | 2 | 0 | 0 | 0 |
| 6 | Crotoned Mountain residential staff work in a collaborative and cooperative manner with all parties involved in planning and providing services for my child. | 5 | 1 | 1 | 0 | 0 | 0 |
| 7 | Crotoned Mountain residential staff exhibit professional behavior, and demeanor at all times. | 4 | 3 | | 0 | 0 | 0 |
| 8 | I am satisfied with the 24 hour healthcare coverage provided at Crotoned Mountain School. | 4 | 3 | 0 | 0 | 0 | 0 |

Analysis by Crotched Mountain of LEA and Parent Survey results:

The surveys were administered in the fall 2012 by mail. Thirteen parents/guardians returned the survey (21%) and 16 SAU/LEAs returned the survey (40%). Overall, the results to each survey were strongly positive. Overall satisfaction with the program was 92% for parents and 86% for SAU/LEAs. From the parent survey we determined that areas of focus for program improvement are transition programs and providing activities with non-disabled students. From the LEA/SAU survey, we determined that areas of focus for program improvement are communication, transition and behavior strategies and discipline. Parents, by way of contrast, were very satisfied with our communication and behavior strategies and discipline programs. These areas will be addressed through the weekly education quality improvement meetings attended by leadership from the school, therapy and residential programs. The staff commented on some of the challenges of including non-disabled peers in our programs due to our location and program focus. Nevertheless, many more activities were planned and implemented during the three years under review when compared with the previous review period. We are also encouraging day students, who make up a quarter of the school population, to attend activities in their home school districts as a transition strategy.

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

Access to the General Curriculum**Implementation of Individual Education Programs (IEPs)****Provision of Non-Academic Services****Full Access to the District's Curriculum****Equal Education Opportunity**

A review of the curricula developed to date by the Crotched Mountain staff reveals a thorough and comprehensive document. Based on the New Hampshire Frameworks, it provides the flexibility and accountability needed for the wide range of needs and abilities Crotched Mountain serves. There was evidence that work had begun on transitioning from the New Hampshire Frameworks to alignment with the Common Core standards. Although Crotched Mountain supplies a wide range of non-academic services on site, additional opportunities are available in nearby school districts and through authentic learning and vocational experiences in the surrounding communities. Educational, medical, and residential staffs collaborate in assuring student access to academic and non-academic experiences. The IEPs reviewed addressed the needs of individual students and reflected the wide range of options available at the school. However, there is a concern about the lack of access to the general curriculum due to the amount of time some students spend out of school, off campus in community based vocational programming. Crotched Mountain needs to show how vocational content meets NH minimum standards and is aligned with NH curriculum frameworks or Common Core standards. Due to Crotched Mountain accepting an individualized education plan that did not meet requirements of Ed 1109.01(a)/34 CFR 300.320 and the resulting delay on the part of Crotched Mountain and the sending district to resolve the IEP concerns there was a delay in the delivery of services and access to the general curriculum. Generally speaking, Crotched Mountain has been attentive to developing and delivering appropriate curriculum and assessment and assuring access through a variety of means. As a result of this situation Crotched Mountain was very pro-active in their response to immediately work on developing structures to improve communication and collaboration with sending school districts.

Transition

Transition Planning

Process: Provision of Free Appropriate Public Education (FAPE)

Transition Services

Although general transition planning is a thoughtful and focused process at Crotched Mountain, the documentation of that work needs to be more. Two out of three IEPs reviewed reflected issues concerning transition. A 14 year old student's individualized education plan had no statement of transition services needed or course of study. A 17 year old student's individualized education plan did not reflect an individual invitation to attend their transition meeting nor had transfer of rights been addressed. However, Crotched Mountain's vocational programs and transition services are well developed and supportive of students as they prepare to transition out of Crotched Mountain School.

Behavior Strategies and Discipline

Crotched Mountain School has a school wide behavior program and evidence of its implementation was observed. Behavior supports are clearly integrated into the day-to-day operations at Crotched Mountain School. Although there are many Crotched Mountain students with behavioral issues they are well managed and the impact on learning is minimized.

SPECIAL EDUCATION POLICIES/ NHDOE BUREAU OF SCHOOL APPROVAL NON-PUBLIC SCHOOL APPLICATION MATERIALS

In addition to the above noted focus areas for the case study presentations, material submitted as part of the application for program approval included: Health/Fire Facility Inspection Reports, the Private School Self Study, Special Education Policies and Procedures, Administrative Policy and Procedures, Current Program Information, and Personnel Roster and Consultant Roster Review and verification of these documents found the Crotched Mountain School to be in not in compliance with all applicable New Hampshire Rules and the Education of Students with Disabilities and requirements for Non-Public Approval.

In order to consolidate educational, legal, and medical procedures Crotched Mountain School has committed all of their legal documents to an electronic system. However, when reviewed by the visiting team for compliance with federal and (New Hampshire) state special education language, it was determined that the NH Rules for the Education of Children with Disabilities were not sufficiently replicated. Crotched Mountain administration will review all of their documents to assure the requirements of federal and state regulations are clearly stated.

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

At the time of the February 12-13, 2013 visit to Crotched Mountain School, the facility was not seeking approval for any new programs.

Upon the conclusion of the Case Study at Crotched Mountain School the building and visiting team members combined their feedback and observations over the two days. Team members considered the case study presentations, IEPs, classroom observations, interviews of parents, administrators, as well as informal conversations with faculty, staff and students. What follows is a list of commendations, findings of non-compliance, and suggestions for improving program operations compiled by the visiting team.

COMMENDATIONS

1. Staff work diligently to provide opportunities for students to participate in a variety of typical activities such as prom, school wide plays, and project based, interdisciplinary learning activities.
2. Crotched Mountain School provides a wide variety of vocational opportunities for its students both school based and in the community.
3. The Crotched Mountain student population is a challenging one and requires significant skills and commitment from those who support them. It is evident the faculty makes a supreme effort to plan collaboratively and participate in cross-training. Staff members reflected the compassionate nature necessary to move students forward in an atmosphere of mutual respect and caring.
4. It is evident that Crotched Mountain School has an extensive array of supports and resources to meet the varied and complex needs of their students. With an ever -changing population it allows them the capacity and flexibility to respond to those needs.

Number of Cases Reviewed During the Crotched Mountain School, February 12-13, 2013 NHDOE Compliance Visitation

| | |
|--|----------|
| Preschool | 0 |
| Elementary School | 1 |
| Middle School | 1 |
| High School, Age Below 16 | 0 |
| High School, Age 16 or Above | 1 |
| Number of Noncompliance for Indicator 13 | 1 |
| Total Number of Case Studies Reviewed | 3 |

FINDINGS OF NONCOMPLIANCE IDENTIFIED AS A RESULT OF THE February 12-13, 2013 CASE STUDY COMPLIANCE REVIEW

Findings 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. Findings of noncompliance 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 findings of noncompliance 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 Findings of Noncompliance to be Addressed by Both the LEA and Private School

Setting: Please Note: *The NH Department of Education, Bureau of Special Education requires that Child Specific Findings of Noncompliance be addressed and resolved within 45 days of notification.*

1. Ed 1114.05(c) Program Requirements

One of three IEPs reviewed did not comply with these requirements: the sending LEA did not send a copy of the child's IEP that met all the requirements of Ed 1109.01 (Elements of the Individualized Education Program)
(Hillsborough School District)

2. Ed 1114.06(a) Responsibilities of Private Providers of Special Education in the Implementation of IEPs

One of three IEPs reviewed was inappropriate for implementation in this setting. Although it was clear that the sending LEA did not respond in a timely manner to the private provider's requests, it was determined that the private provider was not sufficiently assertive in their contacts with the LEA to assure the provision of FAPE and access to the general education curriculum for the student in a timely manner.
(Hillsborough School District)

3. Ed 1109.01(a)(1) Elements of an IEP/34CFR 300.320(b)(2) Definition of Individualized Education Program

One of three IEPs reviewed did not contain a statement of transition services needed or courses of study.
(Hillsborough School District)

4. Ed1103.01(a) IEP Team/34CFR 300.321 (b)(1) IEP Team

One of three IEPs reviewed did not contain evidence that the student was invited to attend an IEP meeting in which transition services were considered.
(Claremont School District)

5. Ed 1120.01(b) Transfer of Rights 34CFR 300.320(c) Transfer of rights at age of majority

One of three IEPs reviewed did not contain evidence that, one year prior, the rights of the parents would be transferred to the child.
(Claremont School District)

Systemic Findings of Noncompliance to Be Addressed by the Private School Setting

1. Ed 1114.04(b) Administration

It was determined by the visiting team that the language of policies and procedures required by IDEA and New Hampshire Rules for the Education of Children with Disabilities were not clearly in evidence in Crotched Mountain documents.

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.** It should be noted that, in the Building Level Data Summary Report on the following pages, any suggestion made by a visiting team member that is actually a finding of noncompliance, has an asterisk (*) before it, and it is also listed above with the findings of noncompliance.

1. Continue to work on aligning existing curriculum with Common Core State Standards and competencies.
2. Continue to expand efforts to partner with local LEAs to increase interaction with typical peers.
3. Continue to connect extended learning and vocational programming to Common Core State Standards/ and NH curriculum competencies.
4. Assure that placement decisions for free appropriate public education (FAPE) in the least restrictive environment (LRE) are clearly documented in the meeting minutes and Written Prior Notice (WPN).
5. Establish a more formal system of documentation of in-house/collaborative planning meetings among staff. Document who was in attendance, what was discussed and any actions or decisions made.
6. Formalize and document your data collection process.

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: Crotched Mountain School | Date: February 12-13, 2013 | |
| Programs: | Number of Cases Reviewed: 3 | |
| Recorder/Summarizer: Kathryn Skoglund and Diane Lurvey | Number of students reviewed age 16+: 1 | Number of students age 16+ cited for Indicator 13: 1 |

CLEARLY PRINT NAMES OF ALL COLLABORATIVE TEAM MEMBERS: PLEASE SEE PAGES 3 AND 4 FOR NAMES

| | | |
|-------|-----------|---|
| Name: | Position: | Building Level or Visiting (circle one) |
| Name: | Position: | Building Level or Visiting (circle one) |
| Name: | Position: | Building Level or Visiting (circle one) |
| Name: | Position: | Building Level or Visiting (circle one) |
| Name: | Position: | Building Level or Visiting (circle one) |
| Name: | Position: | Building Level or Visiting (circle one) |
| Name: | Position: | Building Level or Visiting (circle one) |
| Name: | Position: | Building Level or Visiting (circle one) |
| Name: | Position: | Building Level or Visiting (circle one) |
| Name: | Position: | Building Level or Visiting (circle one) |

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.**

SUMMARIZE YOUR BUILDING LEVEL DATA

ACCESS TO THE GENERAL CURRICULUM STATEMENTS

| Fill in the combined <u>number</u> of times a statement is marked on all Data Collection Forms for this school or building. | | | |
|---|-----|----|-----|
| | YES | NO | N/A |
| 1. There is evidence that when developing the IEP the IEP Team considers: the strengths of the child; (ii) The concerns of the parents for enhancing the education of their child; (iii) The results of the initial or most recent evaluation of the child; and (iv) The academic, developmental, and functional needs of the child ¹ . | 3 | | |
| 2. There is evidence of a system among <i>all</i> staff members who provide direct services for the child, including instructional and residential, of their participation in the process of planning for that child and knowing the contents of the IEP and all other reports and evaluations, as appropriate to their roles and responsibilities ² . | 3 | | |
| 3. There is evidence that the Team uses multiple measures to design, implement and monitor the student's program ^{3,4} . | 3 | | |
| 4. All IEP goals are written in measurable terms ⁵ . | 1 | 2 | |
| 5. Student's IEP has at least one functional goal (as applicable) ⁶ . | 3 | | |
| 6. There is evidence that the student has made progress in IEP Goals over the past three years ^{7,8} . | 2 | 1 | |
| 7. There is evidence that the special education, supplementary aids and/or related services described in the IEP have been delivered ⁹ . | 3 | | |
| 8. There is evidence that NH Minimum Standards for required subjects (credits) are met and provided to the student ¹⁰ . | 2 | 1 | |

¹ Ed 1109.03 When an IEP Is in Effect; IEP Meetings; Development, Review, and Revision of an IEP; Transition Services; 34 CFR 300.324 Development, review, and revision of IEP

² Ed 1114.05(h) Program Requirements

³ Ed 1109.01 (a)(1) Elements of an Individualized Program; 34 CFR 300.320 (a) Definition of IEP

⁴ Ed. 1109.01 Elements of an Individualized Program; 34 CFR 300.320 (3)(i)(ii); Definition of IEP

⁵ Ed. 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

⁶ Ed 1102.01(u) Definitions Functional Goal *Functional goal* means a measurable outcome that is developed by the IEP team to address a need detailed in the analysis of the student's functional performance

⁷ Ed 1109.01 Elements of an IEP

⁸ Ed 1109.03 When an IEP Is in Effect; IEP Meetings; Development, Review, and Revision of an IEP; Transition Services; 34 CFR 300.324 Development, review, and revision of IEP

⁹ Ed 1109.04 (b) Copies of the IEP and evidence of implementation

¹⁰ Ed 1114.05 (g) Program Requirements 34 CFR 300.320 Content of IEP

| | | | |
|--|---|---|---|
| 9. There is evidence the student <u>has access to, is participating and progressing in the general education curriculum (aligned with NH Curriculum Frameworks/CCSS)</u> ¹¹ . | 3 | | |
| 10. There is evidence that the accommodations ¹² and/or modifications ¹³ , as described in the IEP allows the student to access, participate and show progress in the general curriculum ¹⁴ . | 3 | | |
| 11. There is evidence in the IEP of individual accommodations necessary to measure academic achievement or functional performance in state, school-wide or classroom assessments ^{15, 16} . | 3 | | |
| 12. There is evidence that supports and accommodations are provided to this student to allow participation in extracurricular and other non-academic activities ¹⁷ . | 3 | | |
| 13. There is evidence that the IEP team made the placement decision based on Free and Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE) ¹⁸ . | 3 | | |
| 14. There is evidence the student's IEP is reasonably calculated to result in educational benefit. | 3 | | |
| For High School Students: | | | |
| Student is earning credits toward a regular high school diploma ¹⁹ . | | 1 | 2 |
| IF YES: within 4 years? | | | |
| Student will earn an IEP diploma or a certificate of completion ¹⁹ . | 2 | | 1 |
| IF YES: within 4 years? | | 2 | 1 |
| Does this school have a clear policy for earning a high school diploma ²⁰ ? | 3 | | |

¹¹ Ed 1113.08 Curricula; Ed. 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

¹² "Accommodation" means any change in instruction or evaluation determined necessary by the IEP team that does not impact the rigor and/or validity of the subject matter being taught or assessed.

¹³ "Modification" means any change in instruction or evaluation determined necessary by the IEP team that impacts the rigor and validity or rigor or validity, of the subject matter being taught or assessed.

¹⁴ Ed 1113.08 Curricula; Ed. 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

¹⁵ Ed 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

¹⁶ Ed 1109.01 Elements of an IEP; 34 CFR 300.320 (6)(i) Definition of Individualized Education Program

¹⁷ Ed 1113.08 Curricula; Ed 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

¹⁸ Ed 1111.02 Placement Decisions; 34 CFR 300.116 Placements

¹⁹ Ed 1113.13 Diplomas (a)(b)(c); 34 CFR 300.102 Limitation-Exception to FAPE for certain ages

²⁰ Ed 1114.05 Program Requirements (a)(b)

| Access Strengths | Access Suggestions for Improvement |
|---|--|
| <ol style="list-style-type: none"> 1. Crotched Mountain School staff demonstrated remarkable creativity in providing a wide range of options which enable students to participate in adaptive PE classes. 2. There is an extensive array of resources available for staff to utilize in the curriculum library. 3. Technology is well utilized and embedded into students' instructional activities in order to assist them in gaining greater access to the curriculum. | <ol style="list-style-type: none"> 1. Continue to develop creative opportunities for students to not only access, but progress in the general curriculum. 2. Assure that staff in their daily instruction utilizes available curriculum materials. |

TRANSITION STATEMENTS²¹

| Fill in the combined <u>number</u> of times a statement is marked on all Data Collection Forms for this school or building. | | |
|---|-----|----|
| | YES | NO |
| 1. There is evidence that at the time of transition the evaluation summary and other related documents were received in a timely manner ²² . | 2 | 1 |
| 2. There is evidence and documentation that special education, supplementary aids and/or related services described in the IEP were delivered at the time of transition ²³ . | 3 | |
| 3. There is evidence that the information on this student has been shared between each transition including school to school, grade to grade and teacher to teacher including academic and behavior ²⁴ . | 2 | 1 |
| 4. There is evidence that the placement decision is made at least annually by the IEP team with consideration that the student is placed in the least restrictive environment ²⁵ . | 3 | |
| 5. There is evidence that there is collaboration between the LEA and the non-public school in the development, review and revision of the IEP ²⁶ . | 2 | 1 |
| 6. There is evidence of a collaboration process between general and special education staff in the development, review and revision of IEPs, including transition planning for this student ²⁷ . | 3 | |
| 7. There is evidence that the student and parents have been involved in transition discussions and activities ²⁸ . | 3 | |
| 8. If the student turned 14 during the IEP period (or younger if determined by the IEP team), there is evidence that the IEP includes a statement of transition service needs that focuses on the students courses of study ²⁹ . | | 1 |

²¹ 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.

²² 34 CFR 300.323(g) Transmittal of records

²³ Ed 1114.06 Responsibilities of Private Providers of Special Education or Other Non- LEA Programs in the Implementation of IEPs.

²⁴ Ed 1114.05 Program Requirements

²⁵ Ed 1111.02 Placement Decisions; 34 CFR 300.116 Placements

²⁶ Ed 1109.05 IEPs for Children Placed in Private Providers of Special Education or other non-LEA Programs by Public Agencies; 34 CFR 300.325 Private school placements by public agencies

²⁷ Ed 1103.01 IEP Team; 34 CFR 300.321 IEP Team

²⁸ Ed 1103.01 IEP Team; 34 CFR 300.321 IEP Team

²⁹ Ed 1109.01 (10) Elements of the individualized education program

| | | |
|--|---|--|
| 9. If the student turned 16 during the IEP period, there is evidence that the transition plan is designed within a results-oriented process focused on improving academic and functional improvement to facilitate his or her movement from school to post-school goals and activities ³⁰ . | 1 | |
| 10. There is evidence that outside agencies who are involved with this student's transition have participated in transition planning (e.g. DCYF, DJJS, and Area Agency) ³¹ . | 1 | |

| TRANSITION STATEMENTS | YES | NO |
|--|------------|-----------|
| (Transition questions must be answered Yes or No, not N/A) | | |
| For a student who will turn age 14 during the IEP service period (or younger if determined appropriate by the IEP team): The IEP includes 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 | | 1 |
| 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. (required data for federal statistics purposes) | | |
| 1. Is there an appropriate measurable postsecondary goal or goals that covers education OR training AND employment, and, as needed, independent living? | 1 | |
| <i>Can the goal(s) be counted? Will the goal(s) occur after the student graduates from school? Based on the information available about this student, does (do) the postsecondary goal(s) seem appropriate for this student? • If yes to all three, then check Y OR if a postsecondary goal(s) is (are) not stated, check N.</i> | | |
| 2. Is (are) the postsecondary goal(s) updated annually? | 1 | |
| <i>Was (were) the postsecondary goal(s) addressed/ updated in conjunction with the development of the current IEP? • If yes, then check Y OR If the postsecondary goal(s) was (were) not updated with the current IEP, check N.</i> | | |
| 3. Is there evidence that the measurable postsecondary goal(s) were based on age appropriate transition assessment? | 1 | |
| <i>Is the use of transition assessment(s) for the postsecondary goal(s) mentioned in the IEP or evident in the student's file? • If yes, then check Y OR if no, then check N.</i> | | |
| 4. Are there transition services in the IEP that will reasonably enable the student to meet his or her postsecondary goal(s)? | 1 | |

³⁰ Ed 1109.01 (a)(10) Elements of an IEP; 34 CFR 300.320 Definition of an IEP (b); 34 CFR 300.43 Transition Services (a)(1)

³¹ Ed 1103.01 IEP Team; 34 CFR 300.321 IEP Team

| | | | |
|--|------------|-----------|------------|
| <p><i>Is a type of instruction, related service, community experience, or development of employment and other post-school adult living objectives, and if appropriate, acquisition of daily living skills, and provision of a functional vocational evaluation listed in association with meeting the post-secondary goal(s)?</i></p> <ul style="list-style-type: none"> • If yes, then check Y OR if no, then check N. | | | |
| 5. Do the transition services include courses of study that will reasonably enable the student to meet his or her postsecondary goal(s)? | 1 | | |
| <p><i>Do the transition services include courses of study that align with the student's postsecondary goal(s)?</i></p> <ul style="list-style-type: none"> • If yes, then check Y OR if no, then check N. | | | |
| 6. Is (are) there annual IEP goal(s) related to the student's transition services needs? | 1 | | |
| <p><i>Is (are) an annual goal(s) included in the IEP that is/are related to the student's transition services needs?</i></p> <ul style="list-style-type: none"> • If yes, then check Y OR if no, then check N. | | | |
| 7. Is there evidence that the student was invited to the IEP Team meeting where transition services were discussed? | | | 1 |
| 8. <i>For the current year, is there documented evidence in the IEP or cumulative folder that the student was invited to attend the IEP Team meeting?</i> | | | |
| <ul style="list-style-type: none"> • If yes, then check Y OR if no, then check N. | | | |
| Only the following statement may be answered N/A if appropriate. All statements above must be answered Yes or No. | YES | NO | N/A |
| 9. If appropriate, is there evidence that a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority? | | | 1 |
| <p>10. <i>For the current year, is there evidence in the IEP that representatives of any of the following agencies/services were invited to participate in the IEP development including but not limited to: postsecondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living or community participation for this post-secondary goal?</i></p> <p><i>Was consent obtained from the parent (or student, for a student the age of majority)?</i></p> <ul style="list-style-type: none"> • If yes to both, then check Y. • If no invitation is evident and a participating agency is likely to be responsible for providing or paying for transition services and there was consent to invite them to the IEP meeting, then check N. • If it is too early to determine if the student will need outside agency involvement, or no agency is likely to provide or pay for transition services, check NA. • If parent or individual student consent (when appropriate) was not provided, check NA. | | | |
| 11. Student is informed prior to age 17 of his/her rights under IDEA ³² . | 1 | | |
| 12. Does the IEP meet the requirements of Indicator 13? (Check one) Yes (all Ys or NAs for each item (1 – 10) on the Checklist or No (one or more Ns checked) | | 1 | |

³² Ed 1120.01 Applicability; Transfer of Rights 34 CFR 300.320 (c) Transfer of Rights at age of majority

| | | | |
|---|--|---|--|
| 13. There is evidence of the 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 ³³ . | | 1 | |
|---|--|---|--|

³³ Ed 1109.04 Copies of the IEP and Evidence of Implementation (c) 34 CFR 300.305 (e)(2)

| Transition Strengths | Transition Suggestions for Improvement |
|---|---|
| <ol style="list-style-type: none"> 1. Crotched Mountain School staff work effectively to develop and implement strategies that result in increased levels of independent functioning for their students. 2. It is evident that much work has been done to provide career exploration activities and opportunities for students. | <ol style="list-style-type: none"> 1. Continue to work on connecting extended learning opportunities and vocational programming to common core state standards/ and NH curriculum competencies. 2. Continue to expand efforts in establishing more formalized and frequent collaborative planning with LEAs focused on student transition planning. |

BEHAVIOR STRATEGIES AND DISCIPLINE

| Fill in the combined <u>number</u> of times a statement is marked on all Data Collection Forms for this school or building | | |
|--|-----|----|
| | YES | NO |
| 1. There is evidence that, where it has been determined that a child's behavior impedes learning, the use of positive behavioral interventions and supports, and other strategies to address that behavior have been implemented ³⁴ . | 2 | |
| 2. There is evidence that data are used to determine impact of student behavior on his/her learning. | 2 | |
| 3. There is evidence that the IEP team conducted a functional behavior assessment of the student's behavior ³⁵ . | | 1 |
| 4. If appropriate, there is evidence that the IEP team developed a behavior intervention plan that described strategies and supports ³⁶ . | 2 | |
| 5. There is evidence that the interventions, strategies and supports have been developed to address the student's behavior ³⁷ . | 2 | |
| 6. There is evidence that positive interventions, strategies and supports been communicated to the student, parents and key school personnel ³⁸ . | 2 | |
| 7. There is evidence that professional development, and specialized training has been provided to staff, parents, providers and others as appropriate to support the implementation of the behavior plan and strategies ³⁹ . | 2 | |
| 8. If aversive behavioral interventions were used, there is evidence that they were authorized in writing by a physician, and the IEP team, and included in the student's IEP ^{40,41} . | | |
| 9. There is evidence that that the team uses data to demonstrate the results of the behavioral interventions, strategies and supports ⁴² . | 2 | |
| 10. A school-wide behavior intervention model exists. | 3 | |

³⁴ Ed 1114.07 Behavioral Interventions; Ed 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

³⁵ Ed 1124.01 (f)(1)(i)(ii) Disciplinary Procedures; 34 CFR 300.530 Authority of school personnel

³⁶ Ed 1102.01 Definitions (n)

³⁷ Ed 1114.07 Behavioral Interventions

³⁸ Ed 1114.05 Program Requirements

³⁹ Ed 1114.10 Qualifications and Requirements for Instructional, Administrative, and Support Personnel

⁴⁰ Ed 1113.06 (a)(b) Use of Aversive Behavioral Interventions "Aversive Behavioral Interventions" mean (1) A non-medical mechanical restraint that physically restricts student's movement; and (2) physical restraint, not in response to a threat of imminent, serious, physical harm.

⁴¹ Ed 1114.09 Use of Aversive Behavioral Interventions

⁴² Ed 1114.07 (a) Behavioral Interventions

| Behavior Strategy Strengths | Behavior Strategy Suggestions for Improvement |
|---|--|
| <ol style="list-style-type: none"> 1. Staff addressed student behavioral issues in a consistent, caring and effective manner. 2. It is evident that all staff has been trained and exhibit skillful implementation of behavior intervention strategies. | <ol style="list-style-type: none"> 1. Continue periodic behavior management training to sustain consistency and fidelity to the implementation of interventions. 2. To better accommodate for the needs of the changing student population increased training in ABA (Applied Behavioral Analysis) and behavioral consultation may prove beneficial for some students. |