

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

**THE HUNTER SCHOOL
SUMMARY REPORT**

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Chairpersons, Visiting Team:

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Education Consultants

Site Visit Conducted on November 6 & 7, 2014

Date of Report: February 3, 2015

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I. TEAM MEMBERS

Visiting Team Members:

NAME	PROFESSIONAL ROLE
Chairperson: Jane Bergeron-Beaulieu	Education Consultant
Chairperson: Edward Hendry	Education Consultant
Ann Giove	Principal
Kelly Mask	Director of Special Education
Nancy Pierce	Special Education Coordinator
Mary Lane	NHDOE Education Consultant

Building Level Team Members from The Hunter School:

NAME	PROFESSIONAL ROLE
Jim Kemmerer	Executive Director, Hunter School
Laurie Ferris	Associate Director, Hunter School
Teri Mylett	Coordinator of Special Education Services
Tori Chapman	Coordinator of Student Services
Vivian Knezevich	School Counselor
David Lynch	Clinician
Peter LaBreck	Behavior Interventionist

II. INTRODUCTION

The Hunter School is a small non-profit residential and day school located in Rumney, NH. The school is currently approved as a special education school by the New Hampshire Department of Education, Bureau of Special Education and holds non-public approval from the NHDOE to provide year round programming to elementary school girls and boys in grades K-8, who are 4 to 15 years of age. The majority of students enrolled at the Hunter School are identified as having Attention Deficit Hyperactivity Disorder (ADHD); the school is approved by the NHDOE to provide services to a maximum of 28 students identified in one or more of the following disability areas: Autism, Emotional Disturbance, Other Health Impairments, Specific Learning Disability and Speech-Language Impairments. The Hunter School offers both day and residential education components and provides a wide continuum of elementary school offerings including academics, extracurricular and recreational activities. The goal of The Hunter School is to prepare every student for a successful transition back to a lesser restrictive environment, which in most cases is to his/her home and day school environment. The campus is located on 137 acres of land and classes are between 4-6 students.

The Hunter School vision and goals are outlined below.

Vision: To be a model of an educational and therapeutic school of learning and living that will help change the world in a positive way through the healing of our children, our communities and our planet.

Goal: To share with the world new ways to perceive, understand and help highly sensitive children, families, and communities through our unique integrative mainstream and holistic approaches.

Plan: Our growth plan includes strategic development in three areas:

MIND - Energetic Mindfulness™

BODY - Permaculture Principles

SPIRIT - Salem Philosophies

The Hunter School prides itself on the use of Energetic Mindfulness (EM) and the Salem Philosophy. The distinctive methodology of EM showcases and models the tremendous benefits of paying attention in the present moment, being mindful of and self-regulating the impact that our thoughts, behaviors and attitudes have on us, others and the world around us. The Salem Philosophy embodies a vegetarian diet, connection with nature, lack of electronic stimulation and a deep respect for one another and the planet.

Our permaculture culture program further enhances our philosophies and program by allowing children the opportunity to learn about organic farming, sustainability and most important of all the essential relationship we all have with each other, our communities and the planet.

SCHOOL DEMOGRAPHICS	2013-2014	2014-2015
Total Student Enrollment <u>as of October 1</u>	18	21
Special Education Student Enrollment as of October 1	10	13

Do you accept out-of-state students? If so, list number from each state in 2014-15	2NY, 1FL, 1CA, 1VT, 1AL, 1WV, 1TX	
Number and Names of Sending New Hampshire LEAs (as of October 1, 2014)	SAU#67(2), SAU#48(1), SAU#2(1),SAU#65(1)SAU47(1), SAU#9(1), SAU#46(1), SAU#11(1)	
# of Identified Students Suspended One or More Times	0	0
Average Length of Stay for Students	12 Months	12 Months
STAFF DEMOGRAPHICS		
Student/Teacher Ratio (as of October 1, 2014)	3:1	4:1
# of Certified Administrators	1	1
# of Certified Teachers	3	5
# of Current Teachers with Certification through Alt 4	1	0
# of Related Service Providers	2	3
# of Paraprofessionals	5	6
# of Professional Days Made Available to Staff	5	5

SPECIAL EDUCATION PROGRAM DATA <i>(please put NA if not approved for the disability)</i>		
Primary Disability Types:	2013-2014	2014-2015
Autism	4	4
Deaf / Blindness	NA	NA
Deafness	NA	NA
Developmental Delay	NA	NA
Emotional Disturbance	3	4
Hearing Impairment	NA	NA
Intellectual Disability	NA	NA
Multiple Disabilities	NA	NA
Orthopedic Impairment	NA	NA
Other Health Impairment	3	4
Specific Learning Disabilities	0	0
Speech-Language Impairment	0	1
Traumatic Brain Injury	NA	NA
Visual Impairment	NA	NA

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 The Hunter School on November 6 & 7, 2014 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
- All data collected during the visit

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 The Hunter 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 documentation, 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 12, 2013, NHDOE Special Education Program Approval Report, the following patterns were identified as needing improvement:

Findings of Noncompliance	Status as of March 24, 2014	Status as of Nov 6 & 7, 2014
ED 1114.03 (c) Governance Finding: The governing board must ensure that The Hunter School is in compliance with all federal, state and local laws concerning the education of children with disabilities including the IDEA and RSA	In Process	Not Met The Hunter School continues to have systemic findings of noncompliance

<p>186-C</p> <p>ED 1114.03 (e) Governance Finding: The governing board shall ensure that there are sufficient funds to operate the program and that the school finances are handled according to generally accepted accounting principles. At the time of the November 2012 Case Study Compliance Review to The Hunter School, no financial information was provided.</p>	<p>Met</p>	<p>Not Met The visiting team determined that there are not sufficient supplies, materials, equipment, and technology for the implementation of IEPs and curriculum requirements.</p>
<p>ED 1114.04 (a) Administration Finding: The Hunter School must demonstrate fiscal accountability through regular recording of its finances and an annual external audit. At the time of the November 2012 Case Study Compliance Review, no financial information was submitted, nor was there evidence of annual external audit.</p>	<p>Met</p>	<p>Met</p>
<p>ED 1114.05 (c) Program Requirements Finding: Prior to enrollment, the sending LEA shall send a copy of the child’s IEP that meets all requirements of ED 1109 to each private provider of special education. At the time of the November 2012 Case Study Compliance Review, two of the IEPs reviewed lacked full compliance with ED 1109 specifically transition planning and measurable annual goals.</p>	<p>Met</p>	<p>Met</p>
<p>ED 1114.05 (f) Program Requirements Finding: The Hunter School shall not accept any students with disabilities for which the program is not approved. At the time of the November 2012 Case Study</p>	<p>Met</p>	<p>Met</p>

<p>Compliance Review, there was one student identified with the disability code of Autism; The Hunter School is not approved to service students with this identification.</p>		
<p>ED 1114.05 (g) Program Requirements Finding: Students enrolled at The Hunter School must have full access to curricular standards established for NH schools and school district and have certified staff and/or consultants providing oversight to course offerings/instruction. At the time of the November 2012 Case Study Compliance Review, The Hunter School was not able to demonstrate that there was a viable curriculum for both the elementary and middle school levels, one which meets all NH Curriculum Requirements. Both case studies reviewed lacked evidence that students at The Hunter School have access to, and participate in, required elementary and middle schools curriculum content as outlined in the NH Minimum Curriculum Standards and Grade Level Expectations (GLEs).</p>	<p>In Process</p>	<p>Not Met Report that follows outlines the finding that students do not have full access to elementary and middle school curriculum requirements.</p>
<p>ED 1114.06 (b) Responsibilities of Private Providers of Special Education or Other Non-LEA Programs in the Implementation of IEPs Finding: The Hunter School must ensure that there are sufficient supplies, materials and technology in order to fully implement all components of a child’s IEP. At the time of the Case Study Compliance Review, there were not sufficient supplies,</p>	<p>Met</p>	<p>Not Met</p>

materials, materials or equipment to ensure that students are provided with full access to the general education curriculum and that goals as outlined in IEPs could be fully implemented.		
ED 1114.19 (b) Insurance Coverage Finding: The Hunter School must demonstrate that all persons delegated the authority to sign checks or manage funds are bonded at the program's expense. At the time of the November 2012 Case Study Compliance Review, there was no documentation submitted that such individuals have been bonded.	In Process	Met

V. NOVEMBER 6 & 7, 2014 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.

Both of the New Hampshire students reviewed during the case study presentations were randomly selected by the New Hampshire Department of Education and the supporting evidence in the case studies were presented by the staff of The Hunter School. Of the two students selected, one was a middle school student with a primary disability of Speech and Language Impairment, the other was an elementary aged student with a primary disability of Autism. One of the students was residentially placed, the other attending on a day program basis.

LEA SURVEYS

Below are the results of the LEA survey along with summary statement and interpretation provided by The Hunter School. The analysis of the survey results was done by The Hunter School administration and is noted at the end of the survey results.

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, The Hunter School distributed the LEA Survey to the contact people in all LEAs that have students currently enrolled in the school. They received a 67% response from the LEAs.

SUMMARY REPORT OF SENDING LEAs

Name of Private School: Hunter		
Total number of surveys sent: 9	Total # of completed surveys received: 6	Percent of response: 67%
Number of students placed by: LEA: 9	Court: 0	Parent: 0

SCALE 4 STRONGLY AGREE 3 AGREE 2 DISAGREE 1 STRONGLY DISAGREE

	4	3	2	1	No Answer
1. The private school has a curriculum fully aligned to NH Curriculum Frameworks/Common Core State Standards.	2	4			
2. I am satisfied the student has made progress in the educational curriculum at the above school.	4	2			
3. There is evidence of effective instruction aligned with fidelity to the curriculum.	2	4			
4. The school consistently follows special education rules and regulations.	3	3			
5. The school has developed and implemented effective policies and procedures for management of student behavior including the use of aversives.	2	4			
6. The school has an effective behavioral management program.	3	3			
7. I am satisfied with the special education, related and other supplementary aids and services provided by the school.	2	4			
8. The school implements all parts of students' IEPs including accommodations and modifications in both instruction and assessment.	2	4			
9. The school effectively uses data to measure academic growth and to inform instruction.	1	4			1
10. The school uses data to measure behavioral growth and to inform instruction.	1	4			1
11. A mid-year review and annual evaluation of the child's progress relative to the IEP are conducted.	1	4			1
12. The school has a comprehensive progress monitoring system that is communicated and provided to LEA and parents at least as often as the sending district (minimum 3 times per year).	2	4			
13. The progress monitoring 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	4			
14. I am satisfied with the way the school communicates students' progress to the parents and the LEA.		4	1		1
15. The school actively plans for future transition to a less restrictive environment.	2	4			
16. The school implements all aspects of the transition services needs for students turning 14 during the IEP service period and Transition Services as outlined in Indicator 13 (16 years).	1	2			3
17. If the school finds it necessary to change or terminate placement, they notify the	2	4			

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.					
18. The school team sets meeting times that are convenient for both parents and the LEA.	3	3			
19. I would enroll other students at the school.	2	3	1		

Analysis of Response As Summarized by The Hunter School:

Overall, Hunter School considers the summary of the LEA survey as favorable. Strengths would include:

- Satisfaction with academic progress
- Effective instruction aligned with Fidelity to the curriculum
- Adherence to special education rules and regulations
- Effective policies and procedures for managing student behavior
- Implementation of all parts of the child’s IEP
- Satisfaction with the way the school communicates student progress to LEA and parents
- Approval of the school’s comprehensive monitoring system that is communicated to LEA and parents
- Convenient meeting schedule set for both the parents and the LEA

Key target areas that indicate need for improvement and would be target areas for consideration in developing an action plan would include:

- Conducting mid-year reviews and annual evaluation of the child’s progress relative to the IEP
- Progress reports that describe a child’s progress toward IEP goals, include a record of attendance and are written in terminology understandable to parents

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.

Below are the results of the parent survey along with summary statement and interpretation provided by The Hunter School. The analysis of the survey results was done by The Hunter School administration and is noted at the end of the survey results.

SUMMARY OF PARENT SURVEY DATA

Name of Private School: The Hunter School		
Total number of surveys sent: 10	Total # of completed surveys received: 4	Percent of response: 40%

SCALE

3 = COMPLETELY

2 = PARTIALLY

1 = NOT AT ALL

ACCESS TO THE GENERAL CURRICULUM:	3	2	1	No Answer
1. I am satisfied that my child has access to the general education curriculum (Academic IEP goals and school curriculum aligned with Common Core State Standards /NH Curriculum Frameworks).	3	1		
2. My child has opportunities to interact with non-disabled peers on a regular basis unless the IEP team has determined that the interaction is not appropriate/reasonable.	1	2		1
3. I am informed on a regular basis and with clear evidence of my child's progress in the general education curriculum.	1	2		1
4. I understand that a variety of information (observations, test scores, results of evaluations, school work samples, behavioral data, etc) was considered in developing my child's IEP for this placement.	3	1		
5. I am satisfied that there is a direct connection between my child's needs and the components of his/her IEP and the supports and services ("reasonably calculated to provide educational benefit").	3	1		
6. I am satisfied that the sending school district has fully considered the Least Restrictive Environment in recommending this placement for my child (to the maximum extent appropriate, my child is educated with non-disabled peers).	4			
7. I know whom to contact if I have questions about my child's placement or progress in this program.	4			
8. I am satisfied that the staff of this placement worked collaboratively with my school district in developing my child's current IEP.	2	2		
9. I have been involved in the development of my child's IEP.	4			
10. I am satisfied that my child is making progress toward his/her IEP goals.	3	1		
FOR PARENTS OF HIGH SCHOOL STUDENTS ONLY:				
11. My child earns credits toward a regular high school diploma in all of his/her classes.				4
12. My student will graduate with a high school diploma				4
TRANSITION:				
13. I am satisfied with the planning and support provided for my child as he/she moves from grade to grade, school to school, public school to private school.		2		2
14. All of the people who are important to my child's transition were part of the planning (grade appropriate).	2			2
15. All of the people/agencies who are required to be part of transition planning for my child were part of the transition process.	2			2
16. FOR PARENTS OF STUDENTS AGE 16 OR OLDER ONLY:				
I am satisfied that my child's IEP meets all the requirements of Secondary Transition: measureable post-secondary goals, necessary supports and services, age-appropriate transition assessments, specific invitation to the Transition meeting, etc. (DOE Indicator #13)				4
17. I am satisfied that the post-secondary Transition Goals for my child are reviewed on a regular basis, have the necessary supports and services to be accomplished, are connected to annual IEP goals, and can lead my child to productive participation/activities post-graduation or post-21 years as appropriate.				4
BEHAVIOR STRATEGIES AND DISCIPLINE:				
18. 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
19. I have been involved in the development of behavior interventions, strategies and supports for my child.	2	1	1	
20. I am satisfied with the way the school is supporting my child’s behavioral, social and developmental needs.	2	1		1
OTHER:				
21. I fully participate in special education decisions regarding my child.	3	1		
22. I have been provided with a copy of the procedural safeguards (parental rights) at least once a year.	4			
Analysis of Response provided by The Hunter School:				
<p>Overall, the responding parent surveys are favorable. Target areas in need of consideration include more communication and greater parent involvement in the development of behavior interventions, strategies and support.</p> <p>Comments: “Better communication between school staff and parents.” “More communication from teachers, clinicians.”</p>				

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

Access to the General Curriculum

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

While the Hunter School continues to work on curriculum revision and development and references are made to implementation of the SAU 48 curriculum, full access to the general curriculum continues to be a work in progress. Upon review of the curriculum and the case study compliance reviews presented to the visiting team, it was clear that curriculum guides have been developed by individual teachers, although such documents varied in content and format and no mechanisms are in place to monitor whether or not curriculum is being implemented. As a result it was not possible to determine that general education requirements for elementary and middle school students as outlined in the NH Minimum State Standards are being met. The visiting team determined that currently the Hunter School does not meet the curriculum requirements that allow for equal educational opportunities. This is evident in the following:

- Curriculum management planning in The Hunter School is inadequate to direct the design, implementation, monitoring, evaluation and revision of curriculum.
- The written curriculum lacks the specific characteristics needed to direct classroom instruction, promote deep alignment, support improved student achievement, and provide a consistent educational program across the school.

- Expectations for curriculum delivery are broadly defined and do not provide sufficient direction for instructional practices.
- Written curriculum guides lack the specific characteristics needed to direct classroom instruction, promote deep alignment, support improved student learning and provide a consistent educational program across all grade levels.
- There is no oversight or monitoring of curriculum implementation.
- Relationships with required content consultants had not yet been established and certified educators teaching outside of their content areas had no documented support/consultation from teachers who hold appropriate content area certification.

Transition

Transition Planning

Process: Provision of Free Appropriate Public Education (FAPE)

Transition Services

There are many transition processes in place and staff work hard to document those efforts. Based on the November 2014 Case Studies presented to the visiting team, it was clear that, upon admission to The Hunter School, transition planning is intentional and occurs on a scheduled and regular basis. Additionally it was evident that there is well-defined communication between and among staff, both residential and education, as well as with the sending LEAs, parents and other associated agencies. All staff members demonstrate an individualized and “wrap around” philosophy with regard to implementation of transition planning and ensure that all stakeholders, including the student, are engaged in transition planning. Knowing that many of The Hunter School students have experienced numerous transitions, the staff is especially dedicated to devoting considerable time and effort to making all transitions smooth and student centered. Since the two case studies presented were children under the age of 13, secondary transition planning requirements were not applicable. That being said, there was sufficient evidence that transitioning planning occurs for elementary and middle school students at The Hunter School, and that parents, students and the LEAs are involved. Documentation of such included daily logs between the school and residence, the daily meeting notes among teaching staff, correspondence between LEA’s and the school as well as between families, therapists, and the Hunter School.

Behavior Strategies and Discipline

The Hunter School philosophy, goals and values speak to mindfulness. The policy manual references the “Nonviolent and Crisis Intervention Program” that is utilized to help staff provide the best possible care, welfare, safety, and security of students who might be involved in a crisis situation. Upon the observations made by the visiting team during the November 6 & 7, 2014 Case Study Compliance review, the team expressed concerns in regard to the consistency in the implementation of behavioral interventions and suggested further professional development for staff. Specifically the visiting team observed physical interventions with students and questioned documentation of such interventions further noting that policy and procedures regarding management of student behaviors needed to be updated. As The Hunter School continues to evolve, so do the day to day behavior management strategies and expectations for the students enrolled. Based on the case study presentations, along with observations of classrooms, it became evident that there is a need for: 1) more clearly defined and consistent implementation of behavior management practices; 2) policy and procedures to be updated; and 3) staff and administration be provided with professional development.

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. Upon review of all materials submitted, there were several areas identified as not meeting compliance with applicable New Hampshire Rules and the Education of Students with Disabilities and requirements for Non-Public Approval, all of which are outlined in systemic findings of noncompliance.

COMMENDATIONS

The Hunter School staff and administration are commended for their conscientious attention to the preparation for the Case Study Compliance Review which was approached as a constructive opportunity to reflect upon the scope and relevance of programming as well as compliance with state and federal special education rules and regulations. This was evident in the hospitality and proactive stance throughout the two day Case Study Compliance Review conducted by a well informed and high caliber visitation team.

1. The staff and administration at The Hunter School were consistently described by the visiting team and LEAs as dedicated, caring and committed to working with a challenging student population.
2. There is strong collaboration between the clinical staff, residential staff, parents and teachers as demonstrated by collaborative planning time, knowledge of students, and documentation of collaborative meetings.
3. Student/staff ratio is appropriate for working with young students who demonstrate significant attentional, emotional, behavioral and mental health challenges
4. The efforts, to engage students in local community activities, are commended. Examples include participation in local athletic events, events at local university, community service activities etc.
5. The respect and positive relationships between staff and students is impressive, as demonstrated through staff, student, and parent interviews, as well as observations of the school during the visit and pre-visit.

Number of Cases Reviewed During The Hunter School, November 6 & 7, 2014
NHDOE Compliance Visitation

Preschool	
Elementary School	1
Middle School	1
High School, Age Below 16	
High School, Age 16 or Above	
Total Number of Case Studies Reviewed	2

FINDINGS OF NONCOMPLIANCE IDENTIFIED AS A RESULT OF THE
NOVEMBER 6 & 7, 2014 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.**

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.

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.*

Ed 1109.01 (a)(1) Elements of an Individualized Education Program
34 CFR 300.320 (a)(2)(i) Definition of an Individualized Education Program
One IEP reviewed lacked measureable annual goals (for related services)
SAU47 Jaffrey-Rindge

Ed 1109.04 (b) Copies of IEP and Evidence of Implementation
One IEP reviewed lacked evidence that related services outlined in the IEP were being provided
SAU47 Jaffrey-Rindge

Systemic Findings of Noncompliance to Be Addressed by the Private School Setting
Please Note: The NH Department of Education, Bureau of Special Education requires that Systemic Findings of Noncompliance be addressed in a corrective action plan and met within one year of the date of the report; a template and instructions for such planning will be provided.

At The Hunter School there were many praiseworthy strategies, interventions and programming provided to students. However, there were several issues of significance and systemic findings of noncompliance that warrant immediate attention. These include:

- Lack of fully defined written curriculum
- Updated policy and procedures that meet compliance with state and federal rules and regulations
- Supervision and evaluation of staff
- Sound organizational design of the school to include but not limited to: demonstration of fiscal accountability, provision of adequate facilities, materials and equipment necessary for the implementation of IEPs

Specific Findings are outlined below:

Ed 1113.06 (a) (2) Use of Aversive Behavioral Interventions

Finding: Physical Restraint, not in response to a threat of imminent, serious, physical harm cannot be used with students. During the November 2014 Case Study Compliance Review visiting team members reported observing physical restraint of a student.

Ed 1114.03 (c) Governance

Finding: The governing board must ensure that the Hunter School is in compliance with all federal, state and local laws concerning the education of children with disabilities including the IDEA and RSA 186-C. At the time of the November 2014 Case Study Compliance Review there was no evidence that ongoing findings of noncompliance have been addressed by the governing board.

Ed 1114.03 (e) Governance

Finding: The governing board shall ensure that there are sufficient funds to operate the program and that the school finances are handled according to generally accepted accounting principles.

Ed 1114.05 (g) Program Requirements

Finding: Students enrolled must have full access to curricular standards established for NH schools and school districts and have certified staff and/or consultants providing oversight of course offerings/instruction. At the time of the November 2014 Case Study Compliance Review, The Hunter School was not able to demonstrate that a Hunter School curriculum has been adopted, implemented and monitored for both the elementary and middle school levels, one which meets all NH Curriculum Requirements.

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

Finding: The Hunter School must ensure that there are sufficient supplies, materials, and technology in order to fully implement all components of a child's IEP. At the time of the Case Study Compliance Review, there were not sufficient supplies, materials, or equipment to ensure that students are provided full access to the general education curriculum and that goals, as outlined in IEPs, could be fully implemented.

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

Finding: The Hunter School must have processes in place to ensure that staff are creating daily lesson plans that are clear, concise and reflective of the goals in the student IEPs.

Ed 1114.07 (a-g) Behavioral Interventions

Finding: Hunter School must update written policy and procedures to ensure compliance with Ed 1114.07

Ed 1114.10 (c) Qualifications and Requirements for Instructional, Administrative and Support Personnel

Finding: The Hunter School must have written procedures for supervising and evaluating the performance of all staff members and demonstration that such procedures are implemented, documented and monitored.

Ed 1114.10 (d) Qualifications and Requirements for Instructional, Administrative and Support Personnel

Finding: Documentation must be provided that The Hunter School has a written plan for in-service and pre-service training that has been approved by the NHDOE Bureau of Credentialing. The plan submitted expired in 2014. There was no evidence of an existing plan being approved or that a new plan had been submitted to address 2015 and beyond.

Ed 1114.10 (e) Qualifications and Requirements for Instructional, Administrative and Support Personnel

Finding: The Hunter School must have updated job descriptions for personnel that accurately describe titles, roles and responsibilities.

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.

- Immediate attention should be given to the oversight of the curriculum and instruction employed in all aspects of their program
- The Hunter School would benefit from a guided long term strategic planning process which includes a long term business/financial/technology plans
- Consideration should be given to additional professional development for staff in the area of early literacy and related reading/writing interventions for elementary and middle school students
- Design and implement a comprehensive student assessment and program evaluating plan that directs a process for the collection and use of data to monitor the effectiveness of the school's work at all levels, from the academic progress of students to the long term effectiveness of school wide programs
- Design and implement a coordinated, school wide professional development program that supports effective delivery of school curriculum and focuses on improved student achievement

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: The Hunter School	Date: November 6 & 7, 2014	
Programs:	Number of Cases Reviewed: 2	
Recorder/Summarizer: Jane Bergeron	Number of students reviewed age 16+:0	Number of students age 16+ cited for Indicator 13: 0

CLEARLY PRINT NAMES OF ALL COLLABORATIVE TEAM MEMBERS

Name: Jane Bergeron-Beaulieu	Position: Education Consultant	Visiting
Name: Edward Hendry	Position: Education Consultant	Visiting
Name: Ann Giove	Position Curriculum Coordinator	Visiting
Name: Kelly Mask	Position: Director of Special Education	Visiting
Name: Nancy Pierce	Position: Special Education Coordinator	Visiting
Name: Mary Lane	Position: NHDOE Education Consultant	Visiting
Name: Jim Kemmerer	Position: Executive Director, Hunter School	Building Level
Name: Laurie Ferris	Position: Associate Director, Hunter School	Building Level
Name: Teri Mylett	Position: Coord. of Special Ed. Services	Building Level
Name: Tori Chapman	Position: Coordinator of Student Services	Building Level
Name: Vivian Knezevich	Position: School Counselor	Building Level
Name: David Lynch	Position: Clinician	Building Level
Name: Peter LaBreck	Position: Behavior Interventionist	Building Level

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 .	2		
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 .	2		
3. There is evidence that the Team uses multiple measures to design, implement and monitor the student's program ^{3,4} .	2		
4. All IEP goals are written in measurable terms ⁵ .	1	1	
5. Student's IEP has at least one functional goal (as applicable) ⁶ .			N/A
6. There is evidence that the student has made progress in IEP Goals over the past three years ^{7,8} .	2		
7. There is evidence that the special education, supplementary aids and/or related services described in the IEP have been delivered ⁹ .	1	1	
8. There is evidence that NH Minimum Standards for required subjects (credits) are met and provided to the student ¹⁰ .		2	

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</u> the general education curriculum (aligned with NH Curriculum Frameworks/CCSS) ¹¹ .		2	
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 .	2		
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} .	2		
12. There is evidence that supports and accommodations are provided to this student to allow participation in extracurricular and other non-academic activities ¹⁷ .	2		
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 .	2		
14. There is evidence the student's IEP is reasonably calculated to result in educational benefit.	2		
For High School Students:			
Student is earning credits toward a regular high school diploma ¹⁹ .			
IF YES: within 4 years?			
Student will earn an IEP diploma or a certificate of completion ¹⁹ .			
IF YES: within 4 years?			
Does this school have a clear policy for earning a high school diploma ²⁰ ?			

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
<p>Staff provide individualized instruction to all students and are very creative in lesson design</p> <p>Students feel listened to and appreciate the dedication of the staff in implementing personalized learning opportunities</p>	<p>Students report that they would like more rigor and challenge in their academic offerings; this is worthy of discussion on the part of staff and administration</p>

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	
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 .	2	
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	
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 .	2	
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	
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 .	2	
7. There is evidence that the student and parents have been involved in transition discussions and activities ²⁸ .	2	
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 .	N/A	

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 .	N/A	
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 .	N/A	
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	N/A	
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?		
<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?		
<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?		
<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)?		

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. 			
<p>5. Do the transition services include courses of study that will reasonably enable the student to meet his or her postsecondary goal(s)?</p>			
<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. 			
<p>6. Is (are) there annual IEP goal(s) related to the student's transition services needs?</p>			
<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. 			
<p>7. Is there evidence that the student was invited to the IEP Team meeting where transition services were discussed?</p>			
<p>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></p> <ul style="list-style-type: none"> • If yes, then check Y OR if no, then check N. 			
<p>Only the following statement may be answered N/A if appropriate. All statements above must be answered Yes or No.</p>	YES	NO	N/A
<p>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?</p>			
<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. 			
<p>11. Student is informed prior to age 17 of his/her rights under IDEA³².</p>			
<p>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)</p>			

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 goals³³.

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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
<p>Staff and administration are intentional in all aspects of transitions for students, including but not limited to residence to school, school to LEA, school to parent and other relevant agencies</p> <p>Students are involved in monitoring their own progress with transition times and confer and record data with staff</p> <p>The Hunter School has a sincere commitment to transitioning all students to a lesser restrictive environment</p>	<p>Consider strengthening “transition services” for students who return to their home school by providing support from The Hunter School using a “fee for service” model</p>

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 .	2	
4. If appropriate, there is evidence that the IEP team developed a behavior intervention plan that described strategies and supports ³⁶ .	N/A	
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 .	N/A	
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} .	N/A	
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.	2	

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
<p>The school environment is positive and there are many positive behavioral supports for students</p> <p>The mindfulness component of the Hunter School has supported improved behaviors in the school and with individual students</p>	