

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

**NFI BRADFORD SCHOOL  
SUMMARY REPORT**

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Education Consultants

Site Visit Conducted on March 18, 2015  
Date of Report: June 19, 2015

## TABLE OF CONTENTS

- I. Team Members
- II. Introduction
- III. Purpose and Design of The Case Study Compliance Review Process
- IV. Status of Previous Program Approval Report and Corrective Actions
- V. March 18, 2015 Case Study Compliance Review Results
  - Local Education Agency (LEA) Survey
  - Parent Participation
  - Summary of Findings from the Three Focus Areas
  - Commendations
  - Issues of Significance
  - Findings of Noncompliance
  - Suggestions for Program Improvement
- VI. Building Level Summary Report

**I. TEAM MEMBERS**

Visiting Team Members:

<b>NAME</b>	<b>PROFESSIONAL ROLE</b>
Chairperson: Diane Lurvey	Education Consultant
Chairperson: Maryclare Heffernan	Education Consultant
Elisabeth Fowler	Special Education Coordinator
Danielle Paranto	Executive Director
Lori Noordergraaf	NHDOE Educational Consultant

Building Level Team Members from Bradford School:

<b>NAME</b>	<b>PROFESSIONAL ROLE</b>
Michelle Rhodes	Teacher
Linda Saleski	Education Coordinator
Ann Gratton	Program Director
Tracy Rague	Clinical Coordinator
Catherine E. Cyr	Special Education Teacher

## II. INTRODUCTION

The Bradford School, located in Bradford, New Hampshire, is a non-public day school accepting both male and female students. The Bradford School opened in the fall of 2006. The Bradford School is owned and operated by NFI North, Inc. a non-profit human services agency with education and residence programs throughout the states of Maine and New Hampshire. The school's maximum program capacity is for fifteen students who may or may not have an Individualized Education Program (IEP). Per the New Hampshire Department of Education (NHDOE) April 16, 2014 approval letter they are approved for grades K-12, ages 4-21, The program is approved to provide educational services to students identified with Autism, Emotional Disturbance, Other Health Impairments, and Specific Learning Disability. While the census changes periodically, at the time of the NHDOE Special Education Case Study visit there were a total of 3 elementary students (K-5) and 6 students grades 6-12. The current staff to student ratio is 1:5. Bradford School offers a five week academic and experiential program for students grades 6-12. It provides a small classroom setting and the opportunity to reinforce reading and writing skills as well as to develop and enhance social skills. There is also a credit recovery component through PLATO Learning System and VLACS.

The Bradford Mission is: "To value and respect ourselves and the community while learning and growing".

The NFI North Bradford School Core Beliefs are:

- People can change
- Community as healer/teacher
- Teaching allows people to change and grow-punishment does not
- Learning occurs in safe environments that enhance dignity and respect
- Mutual learning between teacher and students enhances healing

Bradford School Practices a Strength Based Approach

- Student of the Week
- Benjamins (positive behavior supports)
- Positives Box
- Point System
- Meet the Challenge
- The opportunity to earn extra privileges

Like the other NFI school programs, the Bradford School follows the NFI agency's model of behavior management through the Normative Approach that "stems from a belief that people are social and want to belong". By creating opportunities for community membership that are meaningful, positive and pro-social, people will join and adopt the behaviors, values and beliefs held by the membership. The Normative Approach emphasizes the following:

- A normalized setting
- Emphasis on strengths
- De-emphasis on labels, a safe environment, family involvement and youth voice
- Open and honest communication
- Creation of a strong and positive peer culture

The result of this living mission coupled with the implementation of the strength based Normative Approach is the promotion of a mutual desire to live in an environment in which healthy boundaries and safety are a reality. The program provides a setting that is educational, supportive, therapeutic, and

individualized through a range of relevant learning experiences that extends the students academic and social opportunities beyond the school walls. This mission is a commonly shared mission among all of the NFI programs.

The Bradford School administrators and staff are working to extend the students academic and social learning opportunities beyond the school walls. The students have participated in trips to Boston, local lakes and hiking trails, and Habitat for Humanity among others.

SCHOOL DEMOGRAPHICS	2013-2014	2014-2015
<b>Total Student Enrollment <u>as of October 1</u></b>	3	4
<b>Special Education Student Enrollment as of October 1</b>	3	4
<b>Do you accept out-of-state students? If so, list number from each state in 2014-15</b>	0	
<b>Number and Names of Sending New Hampshire LEAs (as of October 1, 2014)</b>	SAU 43-Newport SAU 6-Claremont	
# of Identified Students Suspended One or More Times	2	1
<b>Average Length of Stay for Students</b>	8.33 mo.	6.5 mo.
<b><u>STAFF DEMOGRAPHICS</u></b>		
Student/Teacher Ratio (as of October 1, 2014)	1.5:1	2:1
# of Certified Administrators	1	1
# of Certified Teachers	2	2
# of Current Teachers with Certification through Alt 4	0	0
# of Related Service Providers	0	0
# of Paraprofessionals	0	0
# of Professional Days Made Available to Staff	6	6
<b>SPECIAL EDUCATION PROGRAM DATA</b> <i>(please put NA if not approved for the disability)</i>		
<b><u>Primary Disability Types:</u></b>	<b>2013-2014</b>	<b>2014-2015</b>
Autism	0	0
Deaf / Blindness	NA	NA
Deafness	NA	NA
Developmental Delay	NA	NA
Emotional Disturbance	1	3
Hearing Impairment	NA	NA
Intellectual Disability	NA	NA
Multiple Disabilities	NA	NA
Orthopedic Impairment	NA	NA
Other Health Impairment	1	0
Specific Learning Disabilities	1	0
Speech-Language Impairment	NA	NA
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 Bradford School on March 18, 2015 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 Bradford 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 August 10, 2012, NHDOE Special Education Program Approval Report, the following patterns were identified as needing improvement:

Findings of Noncompliance	Status as of June 4, 2013	Status as of March 18, 2015
<p><b>160-C: 11 Possession and Display of Permissible Fireworks; Penalty</b>  I. Notwithstanding RSA 160-B:4, a person who is 21 years of age or older may possess permissible fireworks except in a municipality which has voted to prohibit possession pursuant to RSA 160-C:6. A person who is 21 years of age or older may display permissible fireworks on private property with the written consent of the owner or in the owner's presence, except in a municipality which has voted to prohibit display of permissible fireworks pursuant to RSA 160-C:6.</p> <p>II. Any person who violates the provisions of this section shall be guilty of a violation if a natural person, or guilty of a class B misdemeanor if any other person.</p>	MET January 16, 2013	MET as evidenced by review of materials submitted.
<p><b>Ed. 1109.01 Elements of an IEP</b>  The IEPs reviewed did not include all of the required components (e.g. IEP goals written in measurable terms, transition services NOT evident.)</p>	MET June 4, 2013	MET as evidenced by review of materials submitted.
<p><b>Ed. 1119.03 Full Access to the General Education Curriculum</b>  The Contoocook School, Bradford School and Midway Shelter have worked with the other NFI schools to develop a universal list of consultants in various subject matters. All but a consultant in High School Math are in place.</p>	MET January 16, 2013	MET as evidenced by review of materials submitted.
<p><b>Ed. 1102 Transition Services; CFR 300.43</b>  For student who will turn 14 during the IEP service period the IEP did not include a statement that the student is informed of his/her rights under IDEA; an appropriate measurable postsecondary goal that covers transition services that reasonably enable the student to meet his or her postsecondary goal and statement of transition service needs not included in</p>	MET June 4, 2013	MET as evidenced by review of materials submitted.

the IEP and statement of transition service needs is not presented as a coordinated set of activities.		
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**V. MARCH 18, 2015 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.

In preparation for the visit, the Bradford School was asked to develop an overview of the program as well as two case study presentations describing the educational programs provided to students, with attention to the three focus areas of Access to the General Curriculum, Transition and Behavior Strategies and Discipline. In the overview, demographic information included: student and program demographics, academic program design, the behavioral approach employed including student incentives, community service opportunities, off campus social and learning experiences, as well as transition services and processes utilized to support students’ return to home and school.

During the visit the school presented two case studies of two randomly selected students with an IEP, one from Newport and one from Claremont. One of the students was a ten year old grade 4 student in the Elementary Program and the other was a fifteen year old Grade 10 high school student. The case studies included student participation. Additionally the NHDOE program approval team conducted classroom observations, a parent interview, student interview, administrative team interview and review of student and program records.

**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, Bradford School distributed the LEA Survey to the contact people in all LEAs that have students currently enrolled in the school. They received a 50% response from the LEAs.

### SUMMARY REPORT OF SENDING LEAs

Name of Private School: NFI Bradford School		
Total number of surveys sent: 2	Total # of completed surveys received: 1	Percent of response: 50%
Number of students placed by: LEA: 4	Court: 0	Parent: 0

**INSTRUCTIONS: PLEASE TYPE TOTAL NUMBER OF RESPONSES IN EACH BOX.**

**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.	1				
2. I am satisfied the student has made progress in the educational curriculum at the above school.	1				
3. There is evidence of effective instruction aligned with fidelity to the curriculum.	1				
4. The school consistently follows special education rules and regulations.	1				
5. The school has developed and implemented effective policies and procedures for management of student behavior including the use of aversives.	1				
6. The school has an effective behavioral management program.	1				
7. I am satisfied with the special education, related and other supplementary aids and services provided by the school.	1				
8. The school implements all parts of students' IEPs including accommodations and modifications in both instruction and assessment.	1				
9. The school effectively uses data to measure academic growth and to inform instruction.	1				
10. The school uses data to measure behavioral growth and to inform instruction.	1				
11. A mid-year review and annual evaluation of the child's progress relative to the IEP are conducted.	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).	1				
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.	1				
14. I am satisfied with the way the school communicates students' progress to the parents and the LEA.	1				
15. The school actively plans for future transition to a less restrictive environment.	1				
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				
17. If the school finds it necessary to change or terminate placement, they notify the LEA by convening the IEP team to: review the concerns, review/revise the IEP, discuss the placement and determine if the facility can fully implement the IEP and provide FAPE.	1				
18. The school team sets meeting times that are convenient for both parents and the LEA.	1				
19. I would enroll other students at the school.	1				
<p><b>Analysis of Response by NFI Bradford School:</b>  Only one of the two LEAs responded to the survey that was sent out by the Bradford School. There is a great working relationship between this district and the Bradford School.</p>					

## 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.

### SUMMARY OF PARENT SURVEY DATA

Name of Private School: Bradford School		
Total number of surveys sent: 4	Total # of completed surveys received: 2	Percent of response: 50%

#### INSTRUCTIONS FOR SCHOOL:

**PLEASE FILL IN ACTUAL NUMBER OF RESPONSES (NOT PERCENT) IN EACH BOX.**

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

<b>ACCESS TO THE GENERAL CURRICULUM:</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>No Answer</b>
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).	1	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	1		
3. I am informed on a regular basis and with clear evidence of my child's progress in the general education curriculum.	2			
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.	2			
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").	2			
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).		2		
7. I know whom to contact if I have questions about my child's placement or progress in this program.	1	1		
8. I am satisfied that the staff of this placement worked collaboratively with my school district in developing my child's current IEP.	1			1
9. I have been involved in the development of my child's IEP.	1		1	
10. I am satisfied that my child is making progress toward his/her IEP goals.	1			1
<b>FOR PARENTS OF HIGH SCHOOL STUDENTS ONLY:</b>				
11. My child earns credits toward a regular high school diploma in all of his/her classes.		1		1
12. My student will graduate with a high school diploma	1			1

<b>TRANSITION:</b>				
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.	1	1		
14. All of the people who are important to my child's transition were part of the planning (grade appropriate).	1	1		
15. All of the people/agencies who are required to be part of transition planning for my child were part of the transition process.	1			1
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)				2
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.	1			1
<b>BEHAVIOR STRATEGIES AND DISCIPLINE:</b>				
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>	<b>YES</b>		<b>NO</b>	
	<b>3</b>	<b>2</b>	<b>1</b>	<b>No Answer</b>
19. I have been involved in the development of behavior interventions, strategies and supports for my child.	1	1		
20. I am satisfied with the way the school is supporting my child's behavioral, social and developmental needs.	2			
<b>OTHER:</b>				
21. I fully participate in special education decisions regarding my child.	1	1		
22. I have been provided with a copy of the procedural safeguards (parental rights) at least once a year.	2			

### **Analysis of Parent Survey Responses by Bradford School:**

Two of the four parent surveys sent out were completed and returned. One responded to the question regarding suggestions for improving their child's education as follows:

"He needs to be pushed in his work and exposed to as many different opportunities as possible."

### **Relative Strengths included by focus area:**

#### Access to the General Curriculum

Both parented rated "Completely" on two items:

3. I am informed on a regular basis and with clear evidence of my child's progress in the general education curriculum.

4. I understand that a variety of information....was considered in developing my child's IEP for this placement.

#### Transition

Parents responded to two of the five statements in this section with either "completely" or "partially"

1. 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. All of the people who are important to my child's transition were part of the planning (grade appropriate).

#### Behavior Strategies and Discipline:

Both parents responded "completely" to one statement in this area:

20. I am satisfied with the way the school is supporting my child's behavioral, social and developmental needs.

#### **Areas of concern or need for improvement:**

One parent responded "Not at all" to the statement regarding their involvement with the development of their child's IEP. Since the surveys are anonymous it is difficult to determine if this is a reflection on our program. If the student came to us with an existing IEP, this is not a reflection of our process. We take great care to involve parents at the Bradford School in all aspects of their child's education from day to day achievement and progress, to IEP development.

### **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**

The Bradford School provides access to the general curriculum through the implementation of the school's curriculum, which has recently been revised and updated to align with the NHDOE's (CCSS) Common Core Standards. NFI North NH Schools use the CCSS-aligned model curriculum for English Language Arts and Mathematics as developed by the Ohio State Department of Education. Each class being taught has a curriculum map and syllabus aligned with either CCSS or NH Curriculum Frameworks.

Classroom observations showed students were engaged in their instruction, which included direct and supported instruction, experiential applications and opportunities for project-based learning. Learning Targets were clearly posted in each classroom and students were able to respond appropriately to questions about the learning targets. One student interviewed indicated that they did well in class because "teachers talk with students about the classwork and help them understand the work". When asked what helps you to do well, the student responded; "taking breaks, asking for help and knowing the teacher.

Through the increased use of student outcome data the school staff is able to demonstrate that students are achieving academic growth and meeting IEP goals. Bradford School, like the other NFI programs, have transitioned to the Northwest Evaluation Association (NWEA) Map test to the academic

achievement assessment given to all of the students as a way to gain baseline and benchmark measures of student learning and design student specific instruction. Students have used achievement levels to set their own goals for progress.

Since the last NHDOE Program Approval visit Bradford School has new administrative personnel including an educational coordinator. They have combined professional development through monthly PLC work. The program director for Bradford and Contoocook is the same person. Education Coordinators at both schools meet on a regular basis. As a result, student academic and social/emotional behavior reports reflect positive progress for all students. The Education Coordinator/Principal oversees curriculum and instruction for the school. A block-scheduled has been implemented to reduce the number of transitions and provide some flexibility for increased project-based learning opportunities. Students have responded positively to the block scheduling most importantly to the reduced number of transitions shown by increased class participation number.

The school has developed a well-designed system of organizing student records and transcripts upon admission. The school administrator maintains careful records of courses completed and credit earned through a transcript process. The school works diligently to ensure that all student records and IEPs are updated and complete. They are commended for their work on the behalf of the students. The school culture emphasizes student excellence and achievement and has instituted a number of incentives including the school's Achievement Club, Meet the Challenge, Student of the Week, Kindness Coins, Honor Roll and Academic Recognition. Student recognition for academic achievement is part of the school's culture that supports student learning and goal setting.

### **Transition Planning**

#### **Process: Provision of Free Appropriate Public Education (FAPE)**

#### **Transition Services**

The school is diligent in assuring that each student has access to the general curriculum and for high school students; earning credits toward a high school diploma. Students are able to extend the school's instruction by participating in Plato or Virtual Learning Academy Course (VLAC). Students also have the opportunity to attend classes at the Regional Vocational Center. (One of the students in the case study had been accepted in a culinary program and plans to attend the Vocational Center next school year.) During the visiting team's classroom observations classroom teachers were observed posing real-life, authentic problem solving scenarios that resulted in high levels of student engagement. Students participate in a variety of community-based activities such as; a six week ski program at Pat's Peak, Toys for Tots/a community service program, regular use of the local public library and a recycling program. In addition, students have the opportunity to participate in various Internship Programs, team sports, fitness training and connections to Vocational Rehabilitation. Students also receive assistance with resume writing, college interviews and college essays.

Information is shared in a variety of ways about students at Bradford School. Information from teacher to teacher, and grade to grade, is shared through an onsite facilitation of behavior points system each day, daily staff meetings, case management, advising time, supervision, and IEP meetings.

### **Behavior Strategies and Discipline**

Bradford School's mission statement, "To value and respect ourselves and the community while learning and growing" is posted in multiple places in the school and guides the work of the school in creating a culture of positive behavior. The NFI agency-wide Normative Approach, based on the

premise that all people desire to belong to a group/community, provides the basis for positive behavior interventions and supports at the Bradford School. The model emphasizes the creation of a positive peer culture through open discussion, feedback and problem solving. The student of the week, Benjamins (positive behavior supports), Positive Box, Point System, Meet the Challenge and the opportunity to earn extra privileges are part of the incentives valued by the students. The school is encouraged to continue to refine that strength based approach to advance a culture of positive behaviors.

- The adoption of Engrade Pro as an online learning management tool aligned with the Common Core State Standards has standardized the gathering and sharing of student learning data. The ability to electronically organize and share students' performance data/grades has enhanced the communication process among students, local school districts, parents and staff.

### **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 Bradford School to be in compliance with all applicable New Hampshire Rules and the Education of Students with Disabilities and requirements for Non-Public Approval.

### **COMMENDATIONS**

The commendations below are a result of the visitors' observations, student, parent and leadership interviews, LEA input and review of records and the two Case Study presentations given to the visitors.

1. The curriculum and instruction observed was aligned to NH State Standards and designed to be engaging and relevant to the students. Learning objectives were clear and posted on the board.
2. There is a focus on individualization to support all learners but also an emphasis on student ownership of their learning goals, progress and ultimate outcomes.
3. The Bradford School administration and staff effectively collaborate with districts and work hard to ensure smooth transitions for students into vocational programs, other educational settings or exiting upon graduation.
4. The Normative Approach is a well-established NFI system-wide belief and practice that creates a school-wide culture of positive behavior and respect for each other.
5. Staff works hard to engage students in authentic, real-life experiences resulting in high levels of learning.

6. NFI North Bradford School use CCSS-aligned model curriculum for English Language Arts and Mathematics as developed by the Ohio State Department of Education. Each class being taught has a curriculum map and syllabus aligned with CCSS or NH Curriculum Frameworks.
7. The adoption of EngradePro as an online learning management tool aligned with the Common Core State Standards has standardized the gathering and sharing of student learning data. The ability to electronically organize and share students' performance data/grades has enhanced the communication process among students, local school districts, parents and staff.

**Number of Cases Reviewed During the Bradford School, March 18, 2015**  
**NHDOE Compliance Visitation**

Preschool	
Elementary School	1
Middle School	
High School, Age Below 16	1
High School, Age 16 or Above	
Number of Noncompliance for Indicator 13	
Total Number of Case Studies Reviewed	<u>2</u>

**FINDINGS OF NONCOMPLIANCE IDENTIFIED AS A RESULT OF THE**  
**MARCH 18, 2015 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*

**There were no Child Specific Findings of Noncompliance**

**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.*

**There were no systemic findings of Noncompliance.**

## **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 pursue opportunities to formalize the community- based experiences into Extended Learning Opportunities as a way for students to earn high school credits with “real world” experiences.
2. Continue with efforts to improve teaching practices and developing strategies around addressing non-compliance behavior.

## 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: Bradford School	Date: March 18, 2015	
Programs: Elementary and Middle/High School	Number of Cases Reviewed: 2	
Recorder/Summarizer: Diane Lurvey	Number of students reviewed age 16+: None	Number of students age 16+ cited for Indicator 13: None

#### **CLEARLY PRINT NAMES OF ALL COLLABORATIVE TEAM MEMBERS**

Name: Ann Gratton	Position: Program Director	Building Level
Name: Greg Magoon	Position: Education Coordinator	Building Level
Name: Linda Saleski	Position: Education Coordinator	Building Level
Name: Danielle Paranto	Position: Executive Director	Visiting
Name: Lori Noordergraaf	Position: NHDOE Education Consultant	Visiting
Name: Betsy Fowler	Position: Special Education Coordinator	Visiting
Name: Maryclare Heffernan	Position: Educational Consultant	Visiting
Name: Diane Lurvey	Position: Educational Consultant	Visiting

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

<sup>1</sup> 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

<sup>2</sup> Ed 1114.05(h) Program Requirements

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

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

<sup>5</sup> Ed. 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

<sup>6</sup> 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

<sup>7</sup> Ed 1109.01 Elements of an IEP

<sup>8</sup> 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

<sup>9</sup> Ed 1109.04 (b) Copies of the IEP and evidence of implementation

<sup>10</sup> 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> <sup>11</sup> .	2		
10. There is evidence that the accommodations <sup>12</sup> and/or modifications <sup>13</sup> , as described in the IEP allows the student to access, participate and show progress in the general curriculum <sup>14</sup> .	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 <sup>15, 16</sup> .	2		
12. There is evidence that supports and accommodations are provided to this student to allow participation in extracurricular and other non-academic activities <sup>17</sup> .			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) <sup>18</sup> .	2		
14. There is evidence the student's IEP is reasonably calculated to result in educational benefit.	2		
<b>For High School Students:</b>			
Student is earning credits toward a regular high school diploma <sup>19</sup> .			
IF YES: within 4 years?	1		
Student will earn an IEP diploma or a certificate of completion <sup>19</sup> .			1
IF YES: within 4 years?			
Does this school have a clear policy for earning a high school diploma <sup>20</sup> ?	1		

<sup>11</sup> Ed 1113.08 Curricula; Ed. 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

<sup>12</sup> "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.

<sup>13</sup> "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.

<sup>14</sup> Ed 1113.08 Curricula; Ed. 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

<sup>15</sup> Ed 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

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

<sup>17</sup> Ed 1113.08 Curricula; Ed 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

<sup>18</sup> Ed 1111.02 Placement Decisions; 34 CFR 300.116 Placements

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

<sup>20</sup> Ed 1114.05 Program Requirements (a)(b)

Access Strengths	Access Suggestions for Improvement
<ul style="list-style-type: none"> <li>• Social/emotional needs are successfully addressed by getting students “ready to learn” which facilitates their access and progress in the general curriculum. There was excellent utilization of “Social Thinking/Super Flex Program”.</li> <li>• Learning Targets/ curriculum standards /agendas were posted in all classrooms.</li> <li>• Students were actively engaged in authentic/real life learning experiences that were aligned with the posted learning targets.</li> <li>• Bradford School teachers work hard to provide cross-curricular integration of lessons and activities.</li> <li>• There is clear evidence of data gathering, analysis and use in decision making for all aspects of the teaching and learning.</li> <li>• Teachers develop learning opportunities with more choice of activities based on UDL. Professional Development trainings focused on implementing UDL instructional strategies.</li> </ul>	<ul style="list-style-type: none"> <li>• Explore additional ways to increase the use of technology for teaching and learning.</li> <li>• Consider additional Professional Development in the areas of instructional strategies in the content area and in behavior management.</li> </ul>

## TRANSITION STATEMENTS<sup>21</sup>

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 <sup>22</sup> .	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 <sup>23</sup> .	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 <sup>24</sup> .	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 <sup>25</sup> .	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 <sup>26</sup> .	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 <sup>27</sup> .	2	
7. There is evidence that the student and parents have been involved in transition discussions and activities <sup>28</sup> .	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 <sup>29</sup> .	2	

<sup>21</sup> 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.

<sup>22</sup> 34 CFR 300.323(g) Transmittal of records

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

<sup>24</sup> Ed 1114.05 Program Requirements

<sup>25</sup> Ed 1111.02 Placement Decisions; 34 CFR 300.116 Placements

<sup>26</sup> 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

<sup>27</sup> Ed 1103.01 IEP Team; 34 CFR 300.321 IEP Team

<sup>28</sup> Ed 1103.01 IEP Team; 34 CFR 300.321 IEP Team

<sup>29</sup> 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 <sup>30</sup> .		
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) <sup>31</sup> .		

<b>TRANSITION STATEMENTS</b>	<b>YES</b>	<b>NO</b>
<b>(Transition questions must be answered Yes or No, not N/A)</b>		
<b>For a student who will turn age 14</b> during the IEP service period (or younger if determined appropriate by the IEP team): The IEP includes a <b>statement of the transition service needs</b> that focuses on the student's course of study, such as participation in advanced-placement courses or a vocational education program	1	
<b>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)</b>		
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)?		

<sup>30</sup> 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)

<sup>31</sup> 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> <p><i>• If yes, then check Y OR if no, then check N.</i></p>			
<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> <p><i>• If yes, then check Y OR if no, then check N.</i></p>			
<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> <p><i>• If yes, then check Y OR if no, then check N.</i></p>			
<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> <p><i>• If yes, then check Y OR if no, then check N.</i></p>			
<p><b>Only the following statement may be answered N/A if appropriate. <u>All statements above must be answered Yes or No.</u></b></p>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
<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> <p><i>• If yes to both, then check Y.</i></p> <p><i>• 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.</i></p> <p><i>• 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.</i></p> <p><i>• If parent or individual student consent (when appropriate) was not provided, check NA.</i></p>			
<p>11. Student is informed prior to age 17 of his/her rights under IDEA<sup>32</sup>.</p>			
<p>12. <b>Does the IEP meet the requirements of Indicator 13?</b> (Check one)  <b>Yes</b> (all Ys or NAs for each item (1 – 10) on the Checklist or <b>No</b> (one or more Ns checked)</p>			
<p>13. There is evidence of the summary of the student's <b>academic achievement and functional performance</b>, which includes recommendations on how to assist the student in meeting his or her post-secondary goals<sup>33</sup>.</p>			

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

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

Transition Strengths	Transition Suggestions for Improvement
<ul style="list-style-type: none"> <li>• The Bradford School administration and staff effectively collaborate with districts and work hard to ensure smooth transitions for students into vocational programs, other educational settings or exiting upon graduation.</li> <li>• The Bradford School administration and staff have developed an efficient and effective process for receiving pertinent student information in a timely manner.</li> <li>• The Bradford School staff work hard to provide support to parents in understanding their child’s educational transition needs and special education process.</li> <li>• There is a well-organized system of collaboration and communication among all school staff.</li> <li>• There is a well-organized system of collaboration and communication among staff, which results in consistently shared information in a timely manner.</li> <li>• The adoption of Engrade Pro as an online learning management tool aligned with the Common Core State Standards has standardized the gathering and sharing of student learning data. The ability to electronically organize and share students’ performance data/grades has enhanced the communication process among students, local school districts, parents and staff.</li> </ul>	<ul style="list-style-type: none"> <li>• Consider providing an opportunity for students to meet with their “home school” guidance counselor.</li> <li>• Consider inviting Vocational Rehabilitation Counselors to meet with Bradford School students and staff.</li> <li>• In order to review course expectations, accommodations and a system of communication, consider arranging a meeting with the vocational center teacher before a student begins the class.</li> </ul>

## 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 <sup>34</sup> .	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 <sup>35</sup> .	2	
4. If appropriate, there is evidence that the IEP team developed a behavior intervention plan that described strategies and supports <sup>36</sup> .	2	
5. There is evidence that the interventions, strategies and supports have been developed to address the student's behavior <sup>37</sup> .	2	
6. There is evidence that positive interventions, strategies and supports been communicated to the student, parents and key school personnel <sup>38</sup> .	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 <sup>39</sup> .	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 <sup>40,41</sup> .	2	
9. There is evidence that that the team uses data to demonstrate the results of the behavioral interventions, strategies and supports <sup>42</sup> .	2	
10. A school-wide behavior intervention model exists.	2	

<sup>34</sup> Ed 1114.07 Behavioral Interventions; Ed 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

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

<sup>36</sup> Ed 1102.01 Definitions (n)

<sup>37</sup> Ed 1114.07 Behavioral Interventions

<sup>38</sup> Ed 1114.05 Program Requirements

<sup>39</sup> Ed 1114.10 Qualifications and Requirements for Instructional, Administrative, and Support Personnel

<sup>40</sup> 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.

<sup>41</sup> Ed 1114.09 Use of Aversive Behavioral Interventions

<sup>42</sup> Ed 1114.07 (a) Behavioral Interventions

Behavior Strategy Strengths	Behavior Strategy Suggestions for Improvement
<ul style="list-style-type: none"> <li>• The Normative Approach is a well-established NFI system-wide belief and practice that creates a school-wide culture of positive behavior and respect for each other.</li> <li>• Students are involved and take an active role in the development of their own personal “Crisis Plan”.</li> <li>• The commitment to supporting students and families is evidenced by the offering of “Family Connections” program as well as the services of a clinical worker.</li> <li>• The school has demonstrated a willingness to examine practices, using data, and to adapt and make adjustments based on outcomes.</li> <li>• There is a wealth of data collected, compiled and utilized on a daily basis. There is a clear data- driven decision making process established. The process includes student self-rating and reflection data.</li> </ul>	