

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

**NFI Contoocook School  
SUMMARY REPORT**

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Gregg Magoon, Director of Special Education**

Chairpersons, Visiting Team:  
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Education Consultants

Site Visit Conducted on March 17, 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 17, 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
Andra Hall	Principal
Salina Millora	Special Education Director
Lori Noordegraaf	NHDOE Educational Consultant

Building Level Team Members from NFI Contoocook School:

<b>NAME</b>	<b>PROFESSIONAL ROLE</b>
Ann Gratton	Program Director
Greg Magoon	Education Coordinator
Heidi Foisy	Clinical Coordinator
Melissa Walsh	Special Education Teacher
Lynne Clough	Special Education Teacher
Nicole Cargill	Out of District/Transition Coordinator

## II. INTRODUCTION

The NFI Contoocook School, located in Contoocook, New Hampshire, is an approved private day school for girls and boys ages 11 to 21 in grades 6 through 12. The Contoocook 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. It is currently approved by the NH Department of Education, Special Education Bureau as a non-public school with a maximum program capacity for 18 students. Contoocook School accepts students from both in-state and out of state. The year round school “School Year” program and “Summer” program is currently approved by the NH Department of education, Bureau of Special Education. According to the most recent NHDOE Approval Letter they are approved to provide educational services to students identified with Autism, Emotional Disturbance, Other Health Impairment, and Specific Learning Disability. At the time of the New Hampshire Department of Education (NHDOE) Special Education Program Approval visit there were a total of eight girls and boys from ten NH school districts enrolled at the school. The average length of stay at the Contoocook School is 18 months. It is currently approved by the NH Department of Education as a non-public school.

The Mission of the Contoocook School is “To Value and Respect Ourselves and the Community while Learning and Growing”. Staff teach to this mission everyday as they help students develop the social and community skills that will assist them in becoming more engaged and responsible human beings. Their primary goal is to help students achieve academically, but given the nature of the students’ disabilities, Contoocook School simultaneously offers students a safe, therapeutic environment in which they will be able to take healthy risks to learning. In some cases the goal is to help students earn a diploma from Contoocook School; in other cases, the goal is to guide students back into his/her sending school district. In both cases, the goal for all students is to experience a positive learning environment, identify and work toward successful completion of their short and long term goals. The educational beliefs of Contoocook are:

- Address all areas of a child’s growth simultaneously for long term change
- Students want to learn
- Process is far more important than product
- Addressing issues outside of the academic realm can enhance academic performance
- Experience enhances concept development
- Skills can be grasped more easily if experience provides content
- Every community member is a teacher and learner
- People learn when they are having fun
- Family connection and communication is key for a student success
- Encouragement and empowerment of every students to feel they have a voice

Like the other NFI school programs the Contoocook School has embraced 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.

SCHOOL DEMOGRAPHICS	2013-2014	2014-2015
<b>Total Student Enrollment as of October 1</b>	13	7
<b>Special Education Student Enrollment as of October 1</b>	13	7
<b>Do you accept out-of-state students? If so, list number from each state in 2014-15</b>	no	
<b>Number and Names of Sending New Hampshire LEAs (as of October 1, 2014)</b>	Andover SAU #46 Concord # SAU 8 Kearsarge SAU # 65 Winnisquam SAU # 59 Weare SAU # 24 Gilmanton SAU # 79 Pembroke SAU # 53	
# of Identified Students Suspended One or More Times	7	0
<b>Average Length of Stay for Students</b>	18 mos	18 mos
<b><u>STAFF DEMOGRAPHICS</u></b>		
Student/Teacher Ratio (as of October 1, 2014)	5:13	3:7
# of Certified Administrators	1	1
# of Certified Teachers	5	3
# of Current Teachers with Certification through Alt 4	0	0
# of Related Service Providers	1	1
# of Paraprofessionals	0	1
# of Professional Days Made Available to Staff	20	20

<b>SPECIAL EDUCATION PROGRAM DATA</b> (please put NA if not approved for the disability)		
<b>Primary Disability Types:</b>	<b>2013-2014</b>	<b>2014-2015</b>
Autism	1	0
Deaf / Blindness	NA	NA
Deafness	NA	NA
Developmental Delay	NA	NA
Emotional Disturbance	7	5
Hearing Impairment	NA	NA
Intellectual Disability	NA	NA
Multiple Disabilities	NA	NA

Orthopedic Impairment	NA	NA
Other Health Impairment	4	2
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 NFI Contoocook School on March 17, 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 NFI Contoocook 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:

<b>Findings of Noncompliance</b>	<b>Status as of January 16, 2013</b>	<b>Status as of March 17, 2015</b>
<b>Ed. 1119.03 Full Access to the General Education Curriculum</b> – The Contoocook School has 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.	MET	MET as evidenced by review of materials submitted.

#### **V. MARCH 17, 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.

The Contoocook School is a private non-profit facility approved to provide educational and related services to students age 11-21 covering grades 6-12. Two students were randomly selected for case study as part of the Case Study Compliance Review. One student is identified with emotional disturbance and the other student with an emotional disturbance and SLD. Both students are in grade 9, high school level ages 14 and 15 from the Weare and Gilmanton School Districts.

#### **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, NFI Contoocook School distributed the LEA Survey to the contact people in all LEAs that have students currently enrolled in the school. They received a 71% **response** from the LEAs.

### SUMMARY REPORT OF SENDING LEAs

Name of Private School: NFI North Contoocook School		
Total number of surveys sent: 7	Total # of completed surveys received: 5	Percent of response: 71 %
Number of students placed by: LEA: 7	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.	3	1			1
2. I am satisfied the student has made progress in the educational curriculum at the above school.	4	1			
3. There is evidence of effective instruction aligned with fidelity to the curriculum.	3	2			
4. The school consistently follows special education rules and regulations.	4	1			
5. The school has developed and implemented effective policies and procedures for management of student behavior including the use of aversives.	4	1			
6. The school has an effective behavioral management program.	3	1			1
7. I am satisfied with the special education, related and other supplementary aids and services provided by the school.	5				
8. The school implements all parts of students' IEPs including accommodations and modifications in both instruction and assessment.	5				
9. The school effectively uses data to measure academic growth and to inform instruction.	3	2			
10. The school uses data to measure behavioral growth and to inform instruction.	3	2			
11. A mid-year review and annual evaluation of the child's progress relative to the IEP are conducted.	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).	3	2			
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.	3	2			
14. I am satisfied with the way the school communicates students' progress to the parents and the LEA.	4	1			
15. The school actively plans for future transition to a less restrictive environment.	2	3			
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).	3	2			
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.	5				
18. The school team sets meeting times that are convenient for both parents and the LEA.	5				
19. I would enroll other students at the school.	5				
<b>Analysis of Response by Contoocook School:</b>					



Five of the seven surveys sent out to the LEAS's were returned. The following comments were included in the surveys:

“Excellent communication between LEA and NFI.”

“Contoocook School provides a strong placement for high school students.”

Overall, responses indicate that all of the LEAs are satisfied with services provided for their students. The Contoocook School staff is always open to feedback and opportunities to improve the program in order to continue to provide education and related services in a small, caring and supportive environment.

All areas received rating in either the strongly agree or agree categories. The following were rated as **strongly agree** by all five responding LEA's:

7. I am satisfied with the special education, related and other supplementary aids and services provided by the school.
8. The school implements all parts of the students' IEP including accommodations and modifications in both instruction and assessment.
17. If the school finds it necessary to change or terminate the placement, they notify the LEA by convening the IEP team to: review 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 the parents and the LEA.
19. I would enroll other students at the school.

There were no areas in which the LEA's rated that they disagreed or strongly disagreed.

One LEA did not respond to item #6, *The school has an effective behavioral management program*. This was viewed as an oversight, in light of the other responses.

## **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: NFI North Contoocook School		
Total number of surveys sent: 7	Total # of completed surveys received: 2	Percent of response: 29%

### INSTRUCTIONS FOR SCHOOL:

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

**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).	2			
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.	2			
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).	1		1	
7. I know whom to contact if I have questions about my child's placement or progress in this program.	2			
8. I am satisfied that the staff of this placement worked collaboratively with my school district in developing my child's current IEP.	2			
9. I have been involved in the development of my child's IEP.	2			
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.	2			
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.	2			
14. All of the people who are important to my child's transition were part of the planning (grade appropriate).	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			
16. <b>FOR PARENTS OF STUDENTS AGE 16 OR OLDER ONLY:</b> 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)				
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.	1			1
<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.	1			1

**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 Contoocook 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. Teacher lesson plans reflect learning targets which we found clearly posted in each classroom. They use an individualized instructional approach that effectively utilizes individual and small group instruction, real life learning experiences, technology and online learning tools, as relevant to each student's needs. Beyond the offering of traditional classes the school's *Learning in Field Experience* (L.I.F.E.) provides the students with opportunity to extend and apply their learning within the context of real life experiences.

The school is diligent in assuring that each student has access to the general curriculum and is 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). High school students can take dual enrollment through access to college courses.

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. NFI Contoocook 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.

Classroom observations showed students were engaged in their instruction, which included direct and supported instruction, experiential applications and the use of technology. Students were able to respond appropriately to questions about the learning targets. Students interviewed indicated that they were provided with challenging and interesting instruction that resulted in credits earned toward graduation. Students are given multiple opportunities to extend their learning through off campus, community based experiences. Since the previous Program Approval visit, Contoocook staff has participated in the ongoing development of field based experiences including efforts to align with curriculum standards as well as defining course requirements necessary to establish EIOs. For Field Experiences a curriculum map, syllabus, and rubric have been developed.

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**

### **Transition Planning**

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

#### **Transition Services**

Information is shared in a variety of ways about students at Contoocook 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. Case file reviews and assessment reviews are conducted with Program Director, Educational Coordinator, Clinician and Nurse. Information is also shared electronically through EngradePro and Evolv regarding academics and behaviors. Information sharing from school to school is facilitated by the Program Director, Educational Coordinator and clinician. Upon contact with sending school and before a student enters the Contoocook School requests and reviews copy of IEP, current educational and psychological testing reports and any other pertinent information. A tour and interview occur and then the team determines the appropriateness of placement at Contoocook School. The collaboration between the LEA and the non-public school is open and ongoing. This is evidenced through the documentation of frequent emails, phone calls, reports and meetings. There is an annual review of the IEP in which the parents, student and current school attend. Staff meetings are held daily and weekly to collaborate on student's progress. Progress reports, NWEA testing and reports on progress towards goal are sent to parents as well as the LEA. Quarterly reports are sent home showing grades and progress on IEP goals. In addition communication is made between the school and parents to discuss details of transition plans for students. The Freshman Seminar class and L.I.F.E. class are examples of courses not only aligned with CCSS but also specifically designed to address students' transition needs.

## **Behavior Strategies and Discipline**

Contoocook School uses specific PBIS strategies as a school when needed to address behaviors. Students participate in a daily points program where students are self-reflective, and peer and staff evaluated. On a monthly basis the points are totaled to provide students with a community based, earned activity chosen by students called-Meet the Challenge.

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 Contoocook School. The model emphasizes the creation of a positive peer culture through open discussion, feedback and problem solving.

## **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 NFI Contoocook 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 visitor' observations, student, parent and leadership interviews, LEA input and review of records and two case study presentations given to the visitors.

- There is a clear sense of community established at Contoocook School, based on the Normative Approach and fostered by all staff in support of the students placed in their care.
- The curriculum and instruction observed was aligned to NH Common Core Standards and designed to be engaging and relevant to the students. Learning objectives were clear, visible, and posted in the classrooms.
- There is focus on individualization to support all learners but also an emphasis on student ownership and input on their learning goals, progress and successful outcomes.
- 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.
- 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. It encourages student voice and fosters a strong sense of community.
- The school has a culture of reflection and review of their own programs to intentionally create an expectation for continuous improvement.

- The implementation of school wide NWEA assessments periodically strengthens their ability for more frequent measurement of student learning at multiple points throughout the course of instruction.

**Number of Cases Reviewed During the NFI Contoocook School, March 17, 2015,  
NHDOE Compliance Visitation**

Preschool	
Elementary School	
Middle School	
High School, Age Below 16	2
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 17, 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. Consider opportunities to expand the current ELOs/Community Based Experiences as a way for students to further earn high school credits or competencies in real world experiences.

## 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: NFI Contoocook School	Date: March 17, 2015	
Programs:	Number of Cases Reviewed:	
Recorder/Summarizer:	Number of students reviewed age 16+:	Number of students age 16+ cited for Indicator 13:

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

Name: Andra Hall	Position: Principal	Visiting
Name: Ann Gratton	Position: Program Director	Building Level
Name: Heidi Foisy	Position: Clinical Coordinator	Building Level
Name: Lori Noordergraaf	Position: NHDOE	Visiting
Name: Gregg Magoon	Position: Education Coordinator	Building Level
Name: Salina Millora	Position: Special Education Director	Visiting
Name: Maryclare Heffernan	Position: Education Consultant	Visiting
Name: Diane Lurvey	Position: Education 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> .	1		1
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> .	1		1
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> .	1		1
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> .	2		
IF YES: within 4 years?	2		
Student will earn an IEP diploma or a certificate of completion <sup>19</sup> .			
IF YES: within 4 years?			
Does this school have a clear policy for earning a high school diploma <sup>20</sup> ?	2		

<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
<ol style="list-style-type: none"> <li>1. Instructional lessons and student work showed evidence that the curriculum was closely aligned with CCR Standards.</li> <li>2. Students felt strongly that their “school worked for them” and they saw graduation as their goal. Students felt a strong sense of belonging and community that enables them to be more available to learning.</li> <li>3. The staff are highly professional and committed to student achievement at high levels. There is a sense of pride and ownership evident among all of the Contoocook staff in the work they are doing on behalf of the students.</li> <li>4. There is a high level of embedded and relevant professional development offered to all staff on an ongoing basis. (There are 20 PD days built into the school schedule.)</li> <li>5. As a result of the training and implementation of Goalbook as a resource for identification of UDL strategies and interventions, teachers develop learning opportunities with more choice of activities based on UDL.</li> <li>6. Students articulated a strong sense of belonging and community and felt that they were in a safe place for learning.</li> <li>7. Learning standards were posted clearly in the classroom and discussed with students.</li> <li>8. Both parents interviewed stated that Contoocook was the LRE for their child because their child had greater access to learning.</li> <li>9. There is a strong focus on academic goals and high levels of learning.</li> <li>10. The implementation and utilization of “Engradepro” has enhanced communication with parents, staff and students.</li> </ol>	<ol style="list-style-type: none"> <li>1. Consider expanding ELOs with competencies</li> <li>2. Consider exploring a stronger connection with C.T.E. and the work they are currently doing with alignment with competencies.</li> </ol>

## 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	N/A
<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>  <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>  <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>  <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>  <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>			2
<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>  <i>Was consent obtained from the parent (or student, for a student the age of majority)?</i>  <i>• If yes to both, then check Y.</i>  <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>  <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>  <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
<ol style="list-style-type: none"> <li>1. Transition Plans are well done.</li> <li>2. There is a level of involvement with parents and districts to assure smooth and seamless transitions for students.</li> <li>3. There are high levels of communication among staff, students, parents and districts.</li> <li>4. Transitions both into and out of Contoocook School are thoughtful, thorough and seamless.</li> <li>5. Students felt that it was an easy transition for them entering and leaving the school.</li> <li>6. The school administrators and staff work hard to establish and support collaborative relationships with sending districts and the local community.</li> </ol>	<ol style="list-style-type: none"> <li>1. Explore Area Agency involvement.</li> <li>2. Consider a “senior seminar” to help students get out into the community or home school with a familiar adult who can support them—prior to graduation.</li> <li>3. Perhaps assigning a community mentor to assist the student in participating in community activities.</li> <li>4. Explore strategies to gain area agency involvement.</li> </ol>

## 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
<ol style="list-style-type: none"> <li>1. 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> <li>2. 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>3. Administrators and staff work to develop rapport with students based on respect and mutual trust.</li> <li>4. Students report that they feel safe and have learned to develop trust with adults and peers.</li> <li>5. Students know what is expected of them and know that their input and opinions are valued and taken into consideration.</li> <li>6. In order to maintain a high level of consistency in the implementation of behavior strategies, staff participate in embedded, ongoing professional training.</li> </ol>	