

**NEW HAMPSHIRE
DEPARTMENT OF EDUCATION
SPECIAL EDUCATION
PROGRAM APPROVAL VISITATION**

**NFI NORTH COUNTRY SHELTER
SUMMARY REPORT**

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Chairperson, Visiting Team:
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Site Visit Conducted on April 10, 2008
Report Date, May 21, 2008

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I. TEAM MEMBERS

Visiting Team Members:

NAME	PROFESSIONAL ROLE
Chairperson: Mary Anne Byrne	Education Consultant
Steven Gordon	Co-Director of Special Education

Building Level Team Members:

NAME	PROFESSIONAL ROLE	NAME	PROFESSIONAL ROLE
Norman Brown	Program Director	Robyn Carmen	Teacher's Aide
Rachelle Cox	Teacher	Heidi Kirk	Teacher
Tara MacKillop	Regional Agency Supervisor	Nancy Pierce	Principal
Nichollette Simino	Title I	Neil Streit	Education Coordinator

II. INTRODUCTION

The NFI North Country Shelter 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 Shelter was established in 1991 to provide short term, community based shelter and education for up to 15 educationally disabled, court involved youth between the ages of 11 and 17 in grades 5-12. The program is approved to serve students with Learning and Emotional Disabilities and Other Health Impairments. The youth are placed for 60 days or less while awaiting further placement, evaluation, completion of case plans or court action. For each of the past two years, NFI North Country Shelter has served 129 students with disabilities. From 9/4/07 to 2/15/08, they have enrolled 98 students with disabilities.

The Shelter's mission is to create responsible and respectful community using the agency's normative approach which promotes a mutual desire to live in an environment in which healthy boundaries and safety are a reality. The program provides a setting which is educational, supportive, therapeutic and challenging.

III. PURPOSE AND DESIGN OF THE REVIEW PROCESS

The New Hampshire Department of Education (NHDOE) conducted a Special Education Program Approval Visit to NFI North Country Shelter for the purpose of reviewing the present status of programs and services made available to children and youth with educational disabilities.

The New Hampshire Department of Education, Bureau of Special Education conducts program approval visits 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

This focused review permits the NHDOE to leverage its impact for change and improvement within school programs.

This compliance review included the review of:

- ♦ All application materials submitted
- ♦ Status of corrective actions since the last NHDOE Special Education Program Approval Visit
- ♦ Personnel credentials for special education staff (verified by NHDOE)
- ♦ Program descriptions and SPEDIS verification reports
- ♦ All data collected during the visit

The New Hampshire Department of Education provided a visiting team of professional educators to work collaboratively with staff at the NFI North Country Shelter in a variety of data collection activities. Throughout the entire review process working with the staff and administrators, 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 was gathered throughout the process. Examples of evidence included student individual education plans (IEPs), progress reports, samples of student work, grades, extracurricular involvement, permanent records, curriculum, etc. Input was gathered from key constituents, including interviews with administrators and the students. In addition, a classroom observation was conducted. Following is a summary which outlines identified areas of strength and areas needing improvement for NFI North Country Shelter.

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

Based on review of the March 29, 2005 NHDOE Special Education Program Approval Report, the following patterns were identified as needing improvement:

Citation	Status May 8, 2006; May 29, 2007	Status April 10, 2008
Ed1119.10 Length of School Day Life Skills Curriculum Transcript	Partially Met; Met	Met
Ed1119.08 Diplomas Documentation of coursework and credits earned	Partially Met; Met	Partially Met (weekly individual Education Programs, transcript in place. See Citation Section Pg. 6)
Ed 1109.08 Equal Educational Opportunity; Ed1119.03 Full Access to the General Education Curriculum Same as above. In addition, lack of full compliment of content consultants	Partially Met; Partially Met (all content consultants not in place)	Partially Met (All content consultants not in place. See Citation Section Pg.6))

V. April 10, 2008 COMPLIANCE REVIEW RESULTS

Data collection is an important part of the NHDOE Special Education 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 process, it is essential that the school team dig deeply into the data, and not just take a surface look. This process takes time, and the entire team must be involved in collecting and analyzing the data, as well as presenting and summarizing the data with the visiting team. As such, the NHDOE works with educational communities to prepare for the visit and to ensure that the staff and administrators take this opportunity to reflect upon and generalize their newly found knowledge of their programs, practices, policies and procedures.

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

Access To The General Curriculum

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

The NFI North Country Shelter assures that students have access to the general education curriculum in a variety of ways. They do an initial screening to determine academic levels in reading comprehension, vocabulary and math. Within 24 hours of admission, they contact the students' districts to obtain information about the courses the students are taking and request content materials, so that students can continue the studies in their current coursework. In some cases, they have been able to access texts and worksheets/assignments through the district's web portal from their Power School account. In other cases, PLATO software has been used as an instructional tool in a variety of courses. Curriculum materials from AGS are used as well. Each student has a weekly individual curriculum plan that outlines the courses they are working on, integrating the LEA required work/worksheets, PLATO courseware and AGS curriculum content aligned with the current coursework/credit requirements of the student's LEA. Review of sample lesson plans and the classroom observation showed opportunities for students to learn in an experiential/hands-on manner. Weekly progress reports sent to JPPOs and parents report on progress on IEP and other program and behavior goals. Printouts of PLATO progress are included in these reports, when applicable.

Newly revised transcripts include the subjects, class hours effort, grades and credits, if applicable to insure that students get credit for the schoolwork they have done while at the Shelter.

Transition

Transition Planning

Process: Provision of FAPE

Transition Services

Transition is inherent in a Shelter by virtue of court orders and the short term nature of the placements. During the students' stay, staff teaches and reinforces life skills, encourages and supports student efforts in achieving success in their academics and engages them in futures planning. Using the "You Can" program, students take an interest assessment and participate in a variety of topics such as goal setting, communication, violence prevention, conflict resolution, etc. to prepare them for the upcoming transition to a less or more restrictive setting.

NFI North Country tracks students' transitions through census reports, phone calls, letters and personal visits.

Behavior Strategies and Discipline

NFI North Country Shelter has a comprehensive behavior support system that includes: goals, points, support, counseling, call groups, process groups and community meetings. The mission statement "Respect and Responsibility for Self and Others" is the foundation for the system and provides direction for staff and students alike.

COMMENDATIONS

1. The dedication of staff and administrators to the students, the mission, and the unique work of the shelter setting was most evident.
2. The visiting team member, who has been involved in several program approval visits in the past, recognized the great strides the Shelter has made in the past five years in developing and implementing programs.
3. Improvements were noted in the systems in place to obtain and provide student related information.
4. Outdoor learning and recreational activities such as hiking, ropes course, snowboarding, PE in the local gym, art lessons and maple sugaring provide a normalized setting and experience for the youth in residence.
5. Involvement in community service projects such as Toys for Tots, Project Homebound, collecting food for the poor, wood stacking and perpetual care of the local cemetery serves to provide satisfaction for the youth as well as positive public relations for the program with the community.
6. The Shelter has a comprehensive data collection process for gathering and reporting of demographics and points in the behavior system.
7. In order to improve instruction and outcomes for students, NFI is working agency wide to improve the teacher supervision and evaluation process, provide rich professional development opportunities and establish cross agency content consultants. Obtaining consultants in all content areas required by the minimum standards can be challenging, especially for programs in the northern part of the state. Once consultants are employed, the next challenge is to design a process to use them effectively to improve content area instruction. While still in process, the NFI Agency and its Principal are to be commended for their comprehensive approach in these areas.

ISSUES OF SIGNIFICANCE

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

No issues of significance were identified at the time of this visit.

CITATIONS OF NONCOMPLIANCE IDENTIFIED AS A RESULT OF THE April 10, 2008 COMPLIANCE REVIEW

Citations of noncompliance are defined as deficiencies that have been identified through the Compliance Review Process, which are in violation of state and federal special education rules and regulations. Citations of non-compliance may result from review of policies and procedures and related application materials, program presentations, review of student records or any other program approval activity related to the visit. **It is important to note that all citations of non-compliance that are included in this section of the report will need to be addressed in a corrective action plan.**

As a result of the Compliance Review, the following citations of non-compliance were identified. Each citation 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.

1. Ed 1109.08 Equal Education Opportunity; Ed 1119 03 Full Access to the General Education Curriculum

NFI Agency is in the process of establishing content area consultants to be shared across programs; the core content area consultants are in place, some have been identified and are in the hiring process, and some did not appear on the submitted personnel roster. At the time of the visit, the following content area consultants were in process: Art/Music, Library Media Specialist, Health and Family and Consumer Science; the following consultants were not in place: Information and Communication Technology, Technology Education and Business.

2. Ed 1115 Placement of Children with Disabilities; Ed 1130.03 (d) Preplacement and Placement Review Procedures for Children Previously Determined to Have Disabilities.

If the related services, or any other component of the IEP, are to be waived during placement at the Shelter, the IEP team must make and document decisions. (See #1 in section IV)

3. Ed 1119.08 Diplomas

In order to continue to earn credits toward a high school diploma, students must be given full opportunity to continue in the courses they were enrolled in at their home school when placed at the NFI North Country Shelter. (See #2 in section IV)

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.

- 1.** Continue to work to improve the process of obtaining information from the students' home schools. Consider obtaining email addresses for district contact people to add to the methods of communication. Also consider attending the regional special education directors' meetings to inform them of the program and need for receiving required documents in a timely manner.
- 2.** In addition to providing weekly progress reports to JPPOs and parents, it is strongly suggested that these reports be sent to the students' school districts as well. This would serve to enhance communication with the districts in preparation for transition planning back to the home school or to another placement.
- 3.** If the IEP goals from the LEA's IEP are not written in measurable terms, it is suggested that they be included in the progress reports as written and that they be rewritten in measurable terms. This will allow the progress on the goals to be monitored and reported and will serve as a model for future LEA IEP development.
- 4.** Consider developing discharge summaries for exiting students that would include progress on IEP goals, the points earned in the behavior point system along with an analysis and reporting of any patterns or trends, and successful interventions to manage behavior.
- 5.** As part of the correspondence with the LEAs, it is suggested that a copy of their student's completed James O. Monitoring checklist be included, noting missing documents and/or IEP components.
- 6.** Explore additional avenues for instruction such as the Virtual High School and Skills Tutor; use these and other options to challenge the more able students.
- 7.** As resources are available, consider purchasing additional computers to increase students' opportunities to access web based learning programs.
- 8.** Consider the addition of a Physical Education teacher and a Guidance Counselor (in addition to the Clinician) to the staff as resources allow, further supporting the students in these specialized areas.

VI. ADDENDUM: JAMES O SUMMARY

James O. File Review Summary

School: NFI North Country Shelter

Date: March 11, 2008

Reviewer: Mary Anne Byrne

Number of Files Reviewed: 2

By virtue of providing services to court involved youth, the placements of all students at the NFI North Country are governed by the James O. Consent Decree and its requirements to assure students' rights under IDEIA' 04 and the NH Rules. NFI North Country Shelter has set up a checklist and uses the James O. Monitoring compliance checklist to track receipt of necessary documents once they have requested information. If information is not received, they follow up the initial request with a certified letter asking for the missing documentation. In spite of this, NFI North Country Shelter does not always receive needed information in a timely manner, especially given the short stay of their students. When received, the IEPs as written by the LEAs often have missing components (e.g. transition plan, annual goals written in measurable terms, consideration of ESY, etc.). Due to the short term nature of the placements, it has been difficult for NFI North Country Shelter to affect changes/corrections to the IEPs. (See suggestions #1-#5 above)

COMMENDATIONS

1. NFI North Country Shelter is commended for the hard work done in preparation for the file reviews. The files were well organized and the material was readily available and accessible. The education Coordinator was readily available to assist in the file review and was receptive to the reviewer's observations and suggestions.
2. Major improvements have been made in the systems used to obtain and provide student related information.

CITATIONS OF NONCOMPLIANCE

1. Ed 1115 Placement of Children with Disabilities; Ed 1130.03 (d) Preplacement and Placement Review Procedures for Children Previously Determined to have Disabilities.

In one file reviewed, the student was to get Speech and Language consultation as a related service in their IEP. NFI North Country and the LEA agreed verbally to waive this service while the student was placed at the Shelter. Typically the Shelter utilizes the district's personnel to provide the related services in a student's IEP for these short term placements. If the related services, or any other component of the IEP, are to be waived during placement at the Shelter, the IEP team must make and document decisions.

2. Ed 1119.08 Diplomas

In one file reviewed, the student had been taking Physical Science at his home school and was in Biology class at the Shelter. Students must be given full opportunity to continue to earn credits toward a high school diploma while at the Shelter. A change in course such as this could jeopardize this student's credit in Physical Science.