

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

**Second Start Alternative High School  
SUMMARY REPORT**

**James Snodgrass, Executive Director  
Ted Lambrukos, Director of Special Education**

Chairperson, Visiting Team:  
Kathryn Skoglund  
Education Consultant

Site Visit Conducted on December 10-11, 2014  
Date of Report: April 10, 2015

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**I. TEAM MEMBERS**

Visiting Team Members:

<b>NAME</b>	<b>PROFESSIONAL ROLE</b>
Chairperson: Kathryn Skoglund	Education Consultant
Nancy Pierce	Principal
Janet Reed	Director
Colleen Sliva	Special Education Director
John Tuttle	Director of Education
Lori Noordergraaf	NHDOE
Kristina Paul	NHDOE

Building Level Team Members from Second Start Alternative High School:

<b>NAME</b>	<b>PROFESSIONAL ROLE</b>
Isaac Sargent	Lead Teacher/English
Maggie Brady	Teacher/General Special Education
Ray Burstein	Teacher/General Special Education
Debbie Brenner	Guidance Counselor
Ted Lambrukos	Special Education Administrator

## II. INTRODUCTION

Second Start Alternative High School (SSAHS) is a private, non-profit special education program, grades 9-12 that has been in operation for over 30 years, serving students from nearby sending districts that have experienced a lack of educational success due to learning and behavioral issues. Located in Concord, New Hampshire, Second Start is approved for 20 students inclusive of the following educational disabilities: Emotional Disturbance, Multiple Disabilities, Other Health Impaired, Specific Learning Disabilities, and Speech/Language Impaired. This is a special education program that has non-public program approval and does not grant diplomas. Half and full day options are available to the students enrolled.

Second Start's Mission is as follows:

*“Second Start Alternative High School exists to help previously unsuccessful students resume or complete their high school education. Using instruction, modeling, and a variety of experiential activities, the Second Start staff creates a positive environment where students become effective learners and productive citizens in their communities.”*

Second Start's Program Philosophy is as follows:

*“Second Start students struggle with their behavior. After years of failure in their previous schools, these students tend to see teachers and figures of authority as adversarial and they bring these attitudes with them the SSAHS. The staff recognizes this and is committed to helping students create a new educational reality for themselves.”*

### SCHOOL PROFILE

SCHOOL DEMOGRAPHICS	2013-2014	2014-2015
<b>Total Student Enrollment <u>as of October 1</u></b>	<b>32</b>	<b>31</b>
<b>Special Education Student Enrollment as of October 1</b>	<b>13</b>	<b>19</b>
<b>Do you accept out-of-state students? If so, list number from each state in 2014-15</b>	NA	
<b>Number and Names of Sending New Hampshire LEAs (as of October 1, 2014)</b>	SAU8 Concord School District SAU46 Merrimack Valley School District SAU53 Pembroke School District SAU67 Bow School District	
<b># of Identified Students Suspended One or More Times</b>	<b>1</b>	<b>2</b>
<b>Average Length of Stay for Students</b>	<b>6 weeks to 1 Year</b>	<b>6 weeks to 1 Year</b>
<b><u>STAFF DEMOGRAPHICS</u></b>		
<b>Student/Teacher Ratio (as of October 1, 2014)</b>	<b>5 to 1</b>	<b>5 to 1</b>
<b># of Certified Administrators</b>	<b>1</b>	<b>1</b>
<b># of Certified Teachers</b>	<b>3</b>	<b>3</b>
<b># of Current Teachers with Certification through Alt 4</b>	<b>2</b>	<b>2</b>
<b># of Related Service Providers</b>	<b>0</b>	<b>0</b>
<b># of Paraprofessionals</b>	<b>0</b>	<b>0</b>

# of Professional Days Made Available to Staff	12.5	12.5
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Please complete the table below, listing the number of students in each category.

<b>SPECIAL EDUCATION PROGRAM DATA</b> <i>(please put NA if not approved for the disability)</i>		
<b>Primary Disability Types:</b>	<b>2013-2014</b>	<b>2014-2015</b>
Autism	0	0
Deaf / Blindness	0	0
Deafness	0	0
Developmental Delay	0	0
Emotional Disturbance	3	3
Hearing Impairment	0	0
Intellectual Disability	0	0
Multiple Disabilities	1	5
Orthopedic Impairment	0	0
Other Health Impairment	4	3
Specific Learning Disabilities	5	7
Speech-Language Impairment	0	1
Traumatic Brain Injury	0	0
Visual Impairment	0	0

### III. PURPOSE AND DESIGN OF THE CASE STUDY COMPLIANCE REVIEW PROCESS

The New Hampshire Department of Education (NHDOE) conducted a Special Education Program Approval Visit to Second Start Alternative High School on December 10-11, 2014 for the purpose of reviewing the present status of programs and services made available to children and youth with educational disabilities. Program Approval Visits are conducted using a Case Study Model that is a focused review. This focused review permits the NHDOE to leverage its impact for change and improvement within private special education schools statewide, by focusing the attention of all educators on the following three areas of critical importance in the provision of FAPE for students with disabilities.

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

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

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

- All application materials submitted
- Status of corrective actions since the last NHDOE Special Education Program Approval Visit
- Personnel credentials for special education staff (verified by NHDOE)

- Program descriptions
- All data collected during the visit

The New Hampshire Department of Education provided a visiting team of professional educators to work collaboratively with staff in each of the schools in conducting the Case Study Compliance Review and the varied data collection activities. Throughout the entire review process, the visiting team worked in collaboration with the staff of Second Start Alternative High 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 February 13, 2012, NHDOE Special Education Program Approval Report, the following patterns were identified as needing improvement:

<b>Findings of Noncompliance</b>	<b>Status as of August 15, 2012</b>	<b>Status as of December 10-11, 2014</b>
ED 1109.01/34CFR 300.320 Elements of an Individualized Education Plan	MET	NOT MET There is continued non-compliance as noted in the report that follows.
Neither of the two IEPs reviewed during the Case Studies contained measurable goals; each was missing baseline data		

#### **V. DECEMBER 10-11, 2014 CASE STUDY COMPLIANCE REVIEW RESULTS**

Data collection is an important part of the NHDOE Special Education Case Study Compliance Review Process. In order to monitor whether or not special education programs are in compliance in the three focus areas, and determine any root causes of problems that may be identified through the case study process, it is essential that each case study team look deeply into the data that surrounds the three primary aspects of the Case Study Review. This process takes time, and the entire team working with the child being reviewed must be involved in collecting and analyzing the data, as well as presenting and summarizing the data with the visiting team. As such, NHDOE works with private schools to

determine the number and type of case studies to be prepared and presented, and to ensure that building teams are not inundated with more data than can be fully analyzed, allowing them to reflect upon and generalize their newly found knowledge of their programs, practices, policies and procedures.

Two students were randomly selected for the Case Study from Second Start’s current population of 20 students with IEPs. Students were in grade 10 and 11 respectively, and represented two different sending school districts.-Parents are actively involved as are the sending districts with everyone focusing on making this an appropriate and successful experience for both students. The Case Studies on these two students presented to the visiting team provided a clear picture of Second Start’s program through the lens of their respective IEPs.

### 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, Second Start Alternative High School distributed the LEA Survey to the contact people in all LEAs that have students currently enrolled in the school. They received a 100% response from the LEAs.

#### SUMMARY REPORT OF SENDING LEAs

Name of Private School: <b>Second Start Alternative High School</b>		
Total number of surveys sent: <b>4</b>	Total # of completed surveys received: <b>4</b>	Percent of response: <b>100%</b>
Number of students placed by: LEA: <b>19</b>	Court: <b>0</b>	Parent: <b>0</b>

#### 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.	2	2			
2. I am satisfied the student has made progress in the educational curriculum at the above school.	4				
3. There is evidence of effective instruction aligned with fidelity to the curriculum.	3	1			
4. The school consistently follows special education rules and regulations.	3	1			
5. The school has developed and implemented effective policies and procedures for management of student behavior including the use of aversives.	4				
6. The school has an effective behavioral management program.	4				
7. I am satisfied with the special education, related and other supplementary aids and services provided by the school.	3	1			
8. The school implements all parts of students’ IEPs including accommodations and modifications in both instruction and assessment.	4				
9. The school effectively uses data to measure academic growth and to inform instruction.	3	1			
10. The school uses data to measure behavioral growth and to inform instruction.	4				
11. A mid-year review and annual evaluation of the child’s progress relative to the IEP are conducted.	2	2			

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).	4				
13. The progress monitoring reports describe the child's progress toward meeting the IEP goals, include a record of attendance, and are written in terminology understandable to the parent.	4				
14. I am satisfied with the way the school communicates students' progress to the parents and the LEA.	4				
15. The school actively plans for future transition to a less restrictive environment.	4				
16. The school implements all aspects of the transition services needs for students turning 14 during the IEP service period and Transition Services as outlined in Indicator 13 (16 years).	4				
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.	4				
18. The school team sets meeting times that are convenient for both parents and the LEA.	4				
19. I would enroll other students at the school.	4				

**Analysis of Response by Second Start Alternative High School:**

Based on the additional comments by the 4 LEAs and the survey results: We have positive relationships, work well with our students who have behavioral and academic challenges and work closely with the schools to insure access to curriculum. We do very well with effective management of our students, communication to the LEA and families and the progress of the student's educational needs.

Based on the comment of one LEA, we need to improve our communication re: our curriculum. We need to be transparent in regarding how our curriculum alignment is to the NH Frameworks/Common Core Standards. Based on the comment of one LEA, we also need to do a better job of the mid-year review and annual evaluation of the Childs's progress relative to the IEP.

## 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:		
Total number of surveys sent: <b>19</b>	Total # of completed surveys received: <b>17</b>	Percent of response: <b>89%</b>

**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).	<b>15</b>	<b>2</b>	<b>0</b>	<b>0</b>
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.	<b>12</b>	<b>4</b>	<b>0</b>	<b>1</b>
3. I am informed on a regular basis and with clear evidence of my child's progress in the general education curriculum.	<b>15</b>	<b>1</b>	<b>0</b>	<b>1</b>
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.	<b>16</b>	<b>1</b>	<b>0</b>	<b>0</b>
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").	<b>15</b>	<b>2</b>	<b>0</b>	<b>0</b>
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).	<b>15</b>	<b>2</b>	<b>0</b>	<b>0</b>
7. I know whom to contact if I have questions about my child's placement or progress in this program.	<b>16</b>	<b>1</b>	<b>0</b>	<b>0</b>
8. I am satisfied that the staff of this placement worked collaboratively with my school district in developing my child's current IEP.	<b>16</b>	<b>1</b>	<b>0</b>	<b>0</b>
9. I have been involved in the development of my child's IEP.	<b>16</b>	<b>0</b>	<b>0</b>	<b>1</b>
10. I am satisfied that my child is making progress toward his/her IEP goals.	<b>15</b>	<b>2</b>	<b>0</b>	<b>0</b>

<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.	15	2	0	0
12. My student will graduate with a high school diploma	16	0	0	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.	15	2	0	0
14. All of the people who are important to my child's transition were part of the planning (grade appropriate).	15	1	1	0
15. All of the people/agencies who are required to be part of transition planning for my child were part of the transition process.	15	2	0	0
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)	15	2	0	0
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.	14	2	0	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 11</b>		<b>NO 4</b>	
	3	2	1	No Answer
19. I have been involved in the development of behavior interventions, strategies and supports for my child.	10	1	0	6
20. I am satisfied with the way the school is supporting my child's behavioral, social and developmental needs.	9	2	0	6
<b>OTHER:</b>				
21. I fully participate in special education decisions regarding my child.	14	2	0	1
22. I have been provided with a copy of the procedural safeguards (parental rights) at least once a year.	16	1	0	0

Analysis by the Second Start Alternative High School of the data from Parent Surveys is as follows:

*“Parents are invested in their student’s education at Second Start as 89% participated in this survey. The parents also seem to be quite happy with the education, based on the results of the survey and comments stating they are pleased with Second Start.”*

*“I am extremely happy with my daughters’ progress at Second Start.”*

*“Second Start has been a God-send for us.”*

*“Students and parents are seeing progress in the student’s IEP as evident by student report cards and earning credit towards their high school graduation. Lastly, Parents are involved in behavior interventions, strategies and supports of their child/student.”*

## **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**

Second Start Alternative High School continues to maintain the work done over the past three years in curriculum development, appropriately aligned assessments, lesson planning, use of Student Learning Objectives (SLOs), and individualization of instruction. The curriculum that was presented during the last visit on December 14-15, 2011 has been expanded and improved upon as reflected in transitioning from NH Curriculum Frameworks to College and Career Ready Standards (CCRS) and the development of Competencies linked to standards. Detailed lesson plans were provided to the visiting team in advance of the class observations. Data from Formative and Summative assessments are gathered and analyzed regularly by the teaching staff to guide instruction and meet the individual learning needs of all students. Authentic co-teaching and collaborative planning were observed by the visiting team. IEPs are clearly the driving factor of student instruction and are reviewed and revised as indicated by student progress.

As required through the NHDOE Case Study process, the Case Study discussion was held regarding earning of high school credits leading toward a high school diploma. While all of the students enrolled at Second Start have access to a high school diploma issued by their home high school; SSAHS does not grant a high school diploma. School districts who place at SSAHS have an agreement under what conditions the student's grades for courses will be transferred back to their local high school in order to receive high school credits for a high school diploma. The SSAHS offers five courses: English, Mathematics, Science, Social Studies, and Physical Education. These course offerings are differentiated by grade and are based on curriculum standards from either NH Curriculum Frameworks (Science, Social Studies, and Physical Education) or College and Career Ready Standards (Math and English). The balance of the course work required to receive a high school diploma is provided to each student by their sending district high school. Second Start does not grant credits for the courses it offers; data regarding the individual student's achievement and quality of academic performance is communicated to the guidance department of the sending school which then awards the credit. It is the combination of student work done at SSAHS, the credits awarded by the district, and the additional required course work completed at the "home" high school that determines whether the student has met the requirements (as established by the sending district) to receive a high school diploma. A written agreement acknowledging this process is signed by SSAHS and the sending school district upon the student's acceptance at SSAHS.

### **Transition**

#### **Transition Planning**

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

#### **Transition Services**

Transition plans in IEPs are a strong focus for Second Start. Transition is a major factor for all students at Second Start: to and from public (or other private) schools, vocational options such as internships and job experiences, work-study, volunteering, etc. The review of the IEPs for the Case Studies reflected a clear understanding of the state and Federal requirements for transition planning. It is clear that student interests inform the planning and development of measurable post-secondary goals and the related transition services. Helping to operationalize the Transition plans are Transitional Employment Training (TET) and CHOICES. Students participating in TET receive supports and services in pre-vocational and vocational preparation while the CHOICES program engages students in developing the social and emotional growth necessary for success both in school and in the work place. The visiting team was made aware of the many ways in which SSAHS staff communicates with the adults in the work or volunteer settings and builds connections for the students between those settings and Second Start.

### **Behavior Strategies and Discipline**

Several new procedures supportive of behavioral improvement have been put in place since the last Second Start Program Approval visit: formal class meetings twice a day, multiple opportunities for students to seek support or guidance from staff (including a certified guidance counselor), consistent check-in's with students by faculty, multiple recognitions (positive reinforcement) of appropriate behavior on the part of students, and a clear and consistent focus on Second Start "Five Skills", CHOICE Theory, and the Change Model. "Five Skills" comprises listening, controlling behavior, contributing effectively, tolerating feedback, and accepting responsibility. Each student at SSAHS is introduced to these five skills and specific time is committed to define and teach those skills and help each student understand how to put them into practice. Positive recognition is provided on an on-going basis when students effectively employ these practices. CHOICE Theory, driven by five basic human needs, is taught as a class and is expected to help students become more aware of their behavior and the ramifications it has for themselves and others. Finally, the five stages of The Change Model (awareness, thinking, planning, action, and maintenance) is intended to assist students in putting appropriate coping and problem solving skills into operation. All three of these models are fully integrated into the Second Start program and modeled consistently by staff. The result is clear: students, who for many years have had negative school experiences and have developed inappropriate coping mechanisms as a result, are learning to apply appropriate skills and experiencing success both academically and socially.

## **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 Second Start Alternative High School not to be in compliance with all applicable New Hampshire Rules and the Education of Students with Disabilities and requirements for Non-Public Approval. Per NH Rules for the Education of Children with Disabilities, Ed 1114.19(b) Insurance Coverage, (c)(1) Professional liability and bonding insurance, SSAHS must bond all persons delegated the authority to sign checks or manage funds at the programs' expense.

## COMMENDATIONS

### Observations by members of the visiting team resulted in the following commendations:

1. Second Start staff has built a culture of mutual respect (frequently observed by the visiting team (calm exchanges, respectful interaction among students and staff. A result of this is greater student engagement with academic work as many of what would have been interfering behaviors are eliminated.
2. A significant effort is made at Second Start to communicate with students throughout the school day. Class meetings are held at the beginning of each session allowing staff to check in with students and each other. Students are encouraged to share issues and needs with staff on a regular basis. Both staff and students pointed out to the visiting team that these practices prevent little issues from getting out of control and interfering with the flow of the school day.
3. The program design at SSAHS reflects attention to student needs, learning styles, and a variety of instructional techniques. Students have access to guidance and counseling services from a certified guidance counselor, interdisciplinary classes, direct and remedial instruction, and appropriate technology. Providing a foundation for these interventions is a newly revised curriculum (for the courses that SSAHS offers) in which “cross curricular competencies” link College and Career Readiness Standards, course content, scope and sequence, materials and resources, and assessments.
4. The visiting team observed, among other classes, an Economics class. By examining the documents provided by the teaching team, it was evident that: the lesson goals and objectives were linked to CCRS; students had set and were focused on their Student Learning Objectives (SLOs); lesson plans were clear and well-developed; instructional materials available to the students reflected multiple learning styles; a variety of activities captured students’ attention and kept them engaged throughout the lesson. A brief formative assessment at the close of the lesson reflected accomplished objectives.

### Number of Cases Reviewed During the Second Start Alternative High School December 10-11, 2014 NHDOE Compliance Visitation

Preschool	0
Elementary School	0
Middle School	0
High School, Age Below 16	0
High School, Age 16 or Above	2
Number of Noncompliance for Indicator 13	0
Total Number of Case Studies Reviewed	<b>2</b>

**FINDINGS OF NONCOMPLIANCE IDENTIFIED AS A RESULT OF THE  
DECEMBER 10-11, 2014 CASE STUDY COMPLIANCE REVIEW**

Findings of noncompliance are defined as deficiencies that have been identified through the Case Study Compliance Review Process, which are in violation of state and federal special education rules and regulations. Findings of noncompliance may result from review of policies and procedures and related application materials, case study presentations, review of student records or any other program approval activity related to the visit. **It is important to note that all findings of noncompliance listed below must be addressed in a corrective action plan and resolved within one year of this report. A template and instructions for such planning will be provided.**

**Child Specific Findings of Noncompliance to be Addressed by Both the LEA and Private School Setting:** *Please Note: The NH Department of Education, Bureau of Special Education requires that Child Specific Findings of Noncompliance be addressed and resolved within 45 days of notification.*

**Ed 1109.01 (a)(1) Elements of an Individualized Education Program  
CRF 34 300.320 Definition of an Individualized Education Plan**

Two out of two IEPs reviewed by the visiting team did not contain measurable goals.

**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.*

**Ed 1109.01(a)(1) Elements of an Individualized Education Plan  
CRF 34 300.320 Definition of an Individualized Education Program**

Two out of two IEPs reviewed by the visiting team did not contain measurable goals.

**Ed 1114.19(1)(a) Insurance Coverage**

Upon review of SSAHS policies and procedures, it was determined that Second Start did not meet the requirements of this regulation. Although SSAHS carries Criminal Protection Insurance, individuals responsible for managing the organizations finances are not bonded as required under Ed 1114.19(1)(a).

## **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. Since the students accepted by Second Start represent a wide range of academic needs, it is suggested that school-wide professional development be offered on the following topics: Executive Functioning, Language-based Learning Disabilities, and the use of Formative and Summative assessments.
2. As the SSAHS staff participates in the development or revision of IEPs, attention should be given to putting current evaluation information in the profile inclusive of type of assessment, date of evaluation, and, briefly, the results.
3. Deepen and expand community work opportunities and assure a link to “formal” Extended Learning Opportunities (ELOs) and Student Learning Objectives (SLOs).
4. Maintain the process of monitoring separately academic progress and growth in social/emotional areas.

## 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: Second Start Alternative High School	Date: December 10, 11 2014	
Programs:	Number of Cases Reviewed: 2	
Recorder/Summarizer: K. Skoglund	Number of students reviewed age 16+: 2	Number of students age 16+ cited for Indicator 13: 0

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

Name: Kathryn L Skoglund	Position: Education Consultant	Visiting
Name: Nancy Pierce	Position: Principal	Visiting
Name: Janet Reed	Position: Director	Visiting
Name: Colleen Sliva	Position: Special Education Director	Visiting
Name: John Tuttle	Position: Director of Education	Visiting
Name: Ted Lambrukos	Position: Special Education Administrator	Building Level
Name: Isaac Sargent	Position: Lead Teacher/ Curric Coord.	Building Level
Name: Maggie Brady	Position: Teacher	Building Level
Name: Ray Burstein	Position: Teacher	Building Level
Name: Debbie Brenner	Position: Guidance Counselor	Building Level

Based on data collected from the Data Collection Forms, Interview Forms, Classroom Observations, etc. the following summary is intended to provide a “snapshot” of the quality of services and programs in the school in the areas of: **Access to the General Curriculum, Transition and Behavior Strategies and Discipline.**

## SUMMARIZE YOUR BUILDING LEVEL DATA

### ACCESS TO THE GENERAL CURRICULUM STATEMENTS

Fill in the combined <u>number</u> of times a statement is marked on all Data Collection Forms for this school or building.			
	YES	NO	N/A
1. There is evidence that when developing the IEP the IEP Team considers: the strengths of the child; (ii) The concerns of the parents for enhancing the education of their child; (iii) The results of the initial or most recent evaluation of the child; and (iv) The academic, developmental, and functional needs of the child <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</u> the general education curriculum (aligned with NH Curriculum Frameworks/CCSS) <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> .	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> ?			X

<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. Visiting team observed students actively engaged in the learning process.</li> <li>2. Parents supportive, engaged; open and effective channels of communication.</li> <li>3. Evident culture of mutual respect; students engaged in their learning.</li> <li>4. Good communication among students and teachers at each grade level.</li> <li>5. Strong lesson design.</li> <li>6. CHOICES class: students buying in, skills carrying over to other classes and work opportunities.</li> <li>7. Flexible program and lesson design meeting diverse student needs.</li> </ol>	<ol style="list-style-type: none"> <li>1. Be sure Accommodations in the IEP are driven by student's present levels.</li> <li>2. Be sure that IEP goals reflect a balance between academic and behavioral needs.</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> .	NA	

<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> .	2	
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> .	NA	

<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		
<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?	2	
<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?	2	
<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?	2	
<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)?	2	

<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>• If yes, then check Y OR if no, then check N.</p>			
5. Do the transition services include courses of study that will reasonably enable the student to meet his or her postsecondary goal(s)?	2		
<p><i>Do the transition services include courses of study that align with the student's postsecondary goal(s)?</i></p> <p>• If yes, then check Y OR if no, then check N.</p>			
6. Is (are) there annual IEP goal(s) related to the student's transition services needs?	2		
<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>• If yes, then check Y OR if no, then check N.</p>			
7. Is there evidence that the student was invited to the IEP Team meeting where transition services were discussed?	2		
<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>• If yes, then check Y OR if no, then check N.</p>			
<b>Only the following statement may be answered N/A if appropriate. All statements above must be answered Yes or No.</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
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?			X
<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>• If yes to both, then check Y.</p> <p>• 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.</p> <p>• 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.</p> <p>• If parent or individual student consent (when appropriate) was not provided, check NA.</p>			
11. Student is informed prior to age 17 of his/her rights under IDEA <sup>32</sup> .	2		
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)	2		

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

13. There is evidence of the summary of the student's **academic achievement and functional performance**, which includes recommendations on how to assist the student in meeting his or her post-secondary goals<sup>33</sup>.

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<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
	

## 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> .	1	1
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.	X	

<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

<b>Behavior Strategy Strengths</b>	<b>Behavior Strategy Suggestions for Improvement</b>
<p>1. Behavioral management is integrated into the school day and personalized for SSAHS students. Procedures are subtle, respectful and modeled well by the adults.</p>	

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