

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

**SUNUNU YOUTH SERVICES CENTER
SUMMARY REPORT**

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Ann Roberts, Director of Special Education**

Chairpersons, Visiting Team:
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Education Consultants

Site Visit Conducted on January 12 & 13, 2015
Date of Report: May 4, 2015

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I. TEAM MEMBERS

Visiting Team Members:

NAME	PROFESSIONAL ROLE
Chairperson: Maryclare Heffernan	Education Consultant
Chairperson: Joseph Miller	Education Consultant
Jeanne Saunders	Director of Special Services
Kevin Murphy	Executive Director
Santina Thibedeau	Administrator, Bureau of Special Education
Kristina Paul	NHDOE Education Consultant
Angela Keefe	DCYF Educational Specialist

Building Level Team Members from Sununu Youth Services Center:

NAME	PROFESSIONAL ROLE
Claire Pstragowski	Principal
Ann Roberts	Special Education Coordinator
Penny Sampson	SYSC Director
Marie Sullivan	Special Education Teacher

II. INTRODUCTION

The Sununu Youth Service Center (SYSC) is a NH state operated residential treatment center for court order placed students and youth located on a secure campus in a residential area of Manchester. The SYSC school program is approved for a maximum capacity of 108 adjudicated male and female students ages 10 to 17. The short-term placement Youth Development Services Unit (YDSU) for students awaiting adjudication is approved for a maximum capacity of 24 male and female students also ages 10 to 17. The SYSC school program is approved to accept students identified with an educational disability in one of the following disability categories; Autism, Deaf-Blindness, Deafness, Developmental Delay, Emotional Disturbance, Hearing Impairment, Intellectual Disability, Multiple Disabilities, Orthopedic Impairment, Other Health Impairment, Specific Learning Disability, Speech-Language Impairment, Traumatic Brain Injury, and Visual Impairment. YDSU is approved to accept students identified with an educational disability in one or more of the following disability categories: Emotional Disturbance, Other Health Impairment and Specific Learning Disability. Both programs offer school year and summer programs.

At the time of the 2015 NHDOE Program Approval visit, twenty-seven of the SYSC students were identified with an educational disability and sixteen students were non-disabled. The percentage of students with disabilities averages approximately 50-60% over the course of the year. The average length of stay at SYSC has decreased in recent years as a result of a DHHS focus on returning court placed students to their home setting as quickly as possible. The current length of court ordered stays are typically 4, 6 or 9 month placements. Approximately 100 students will transition in and out of the SYSC program annually.

The YDSU program has a higher rate of fluctuation as the students are in very short-term placements often a week to several weeks at a time. At the time of the January 12th & 13th, 2015 Program Approval visit there were 5 students in YDSU, yet the month before there were 16 students enrolled. The high rate of short term placements and high turnover at YDSU means that between 150 and 200 students will transition in and out of the unit over the course of the school year.

At the time of the visit students enrolled at SYSC and YDSU represented 12 SAUs from all geographic parts of the state.

The John H. Sununu Youth Services Center vision and goals are outlined below.

The mission of the Division for Children, Youth and Families (DCYF) and the John H. Sununu Services Center (SYSC) is to promote and balance community safety and positive youth development through the utilization of evidence-based practices. SYSC will document that youths are measurably better when they leave our supervision and care than when they enter. SYSC will achieve positive results by assuring offender accountability through restoration of individuals and communities harmed by misconduct and by treating its youth as assets to be developed within families and communities. SYSC will provide security supervision and appropriate therapeutic programs that will ensure that youths have a greater chance of being successful in the community than when they leave SYSC than when they enter it.

SCHOOL DEMOGRAPHICS	2013-2014	2014-2015
Total Student Enrollment as of October 1, 2014 at SYSC & YDSU	60	43

Special Education Student Enrollment as of October 1, 2014 at SYSC/YDSU	33	24
Do you accept out-of-state students? Yes If so, list number from each state in 2014-15	0	0
Number and Names of Sending New Hampshire LEAs (as of October 1, 2014)	SAU 37, SAU 42, SAU46, SAU 30, SAU 16, SAU 68, SAU 80, SAU 54, SAU 51, SAU 19, SAU 7, SAU 21	
# of Identified Students Suspended One or More Times	0	1
Average Length of Stay for Students	6 months	6 months
STAFF DEMOGRAPHICS		
Student/Teacher Ratio (as of October 1, 2014)	8 to 1	6 to 1
# of Certified Administrators	2	2
# of Certified Teachers	22	14
# of Current Teachers with Certification through Alt 4	3	2
# of Related Service Providers	2	1
# of Paraprofessionals	5	4
# of Professional Days Made Available to Staff	Minimum 3	Minimum 3

SPECIAL EDUCATION PROGRAM DATA <i>(please put NA if not approved for the disability)</i>		
Primary Disability Types:	2013-2014	2014-2015
Autism	0	0
Deaf / Blindness	0	0
Deafness	0	0
Developmental Delay	0	0
Emotional Disturbance	11	14
Hearing Impairment	0	0
Intellectual Disability	0	0
Multiple Disabilities	0	0
Orthopedic Impairment	0	0
Other Health Impairment	9	7
Specific Learning Disabilities	13	3
Speech-Language Impairment	0	0
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 Sununu Youth Services Center on January 12 & 13, 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 Sununu Youth Services Center. 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 4, 2010 NHDOE Special Education Program Approval Report, (Note CA plan and previous findings as Met or Not Met) the following patterns were identified as needing improvement:

Findings of Noncompliance	Status as of (1-yr CA Follow Up Visit Date)	Status as of January 13, 2015
Ed 1102 Transition Services CFR 300.43 Ed 1109.01 Elements of	Met	Met as evidenced by the review of two age 16+ student IEPs and transition plans.

an IEP (Transition Services)		
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V. JANUARY 12 & 13, 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 NH Department of Education Case Study Program Approval Compliance Review conducted on January 12 & 13, 2015 included the random selection of two case study students, one male student age 16 in 9th grade identified as Emotional Disability and Other Health Impairment, and one female student age 16 in grade 11 identified with an Emotional Disability. One of the students was preparing to return to his local school within a few weeks and the visiting team was able to hear specific transition planning processes and supports available for him. The students were from the Goffstown and Seabrook School Districts and in each case the Local Education Agency representative participated in the full case study.

Both of the students who participated in the Case Study have documented growth in academic and social/emotional and behavioral performance based on SYSC outcome data. The Case Study process included interviewing students, parents and guardians. By the self-reporting both students and guardians saw improved learning, credits successfully gained and an increase in self-esteem

LEA SURVEYS

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

Private schools provide necessary options to New Hampshire students with educational disabilities. Effective partnerships with LEAs are an important part of establishing and implementing successful private special education programs that improve student outcomes. By surveying LEA perceptions of current program(s), private schools can self assess these relationships and determine if there are areas in need of improvement. To this end, Sununu Youth Services Center distributed the LEA Survey to the contact people in all LEAs that have students currently enrolled in the school. They received a 60% response from the LEAs.

SUMMARY REPORT OF SENDING LEAs

Name of Private School: NH Sununu Youth Services Center

Total number of surveys sent: 23	Total # of completed surveys received: 14	Percent of response: 60%
Number of students placed by: LEA: 0	Court: 100%	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.	8	6			
2. I am satisfied the student has made progress in the educational curriculum at the above school.	7	7			
3. There is evidence of effective instruction aligned with fidelity to the curriculum.	7	7			
4. The school consistently follows special education rules and regulations.	9	5			
5. The school has developed and implemented effective policies and procedures for management of student behavior including the use of aversives.	10	4			
6. The school has an effective behavioral management program.	12	2			
7. I am satisfied with the special education, related and other supplementary aids and services provided by the school.	8	6			
8. The school implements all parts of students' IEPs including accommodations and modifications in both instruction and assessment.	8	6			
9. The school effectively uses data to measure academic growth and to inform instruction.	8	6			
10. The school uses data to measure behavioral growth and to inform instruction.	8	6			
11. A mid-year review and annual evaluation of the child's progress relative to the IEP are conducted.	9	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).	10	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.	10	4			
14. I am satisfied with the way the school communicates students' progress to the parents and the LEA.	7	7			
15. The school actively plans for future transition to a less restrictive environment.	12	2			
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).	6	7			1
17. If the school finds it necessary to change or terminate placement, they notify the LEA by convening the IEP team to: review the concerns, review/revise the IEP, discuss the placement and determine if the facility can fully implement the IEP and provide FAPE.	8	3			3
18. The school team sets meeting times that are convenient for both parents and the LEA.	10	4			

19. I would enroll other students at the school.	5	1		1	7
Analysis of Response by Sununu Youth Services Center					
The majority of responses were favorable. The only (2) rating was #11 (midyear and end of year evaluation). Progress reports are completed quarterly and annual review meetings are held when students IEPs expire while placed. Comments indicate excellent communication with family and LEA. Related services for students placed short term (detained) can be difficult prior to leaving (average stay 30days or less).					

PARENT PARTICIPATION

One of the defining features of effective schools is strong parent/community relations and open communication. Having parents as active stakeholders in the NHDOE Special Education Program Approval Process ensures broader perspectives and brings forth new ideas. In addition, including the parent perspective enhances and strengthens the teams’ case study presentations, and makes for stronger school/parent relationships. As such, parent participation and input is a required part of the NHDOE Special Education Program Approval Process. In order to ensure parent participation and feedback, the NHDOE, Bureau of Special Education involves parents in a variety of aspects of the Special Education Program Approval Process. First, parents are encouraged to be active participants in the case study presentations; second, parents of the children presented in the case study process are formally interviewed; and third, the school is required to send all parents of students with disabilities a written survey with a request to respond. Below is a summary of the results of the parent survey, along with a summary of the comments/feedback provided to the visiting team during this Case Study Compliance Review.

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

SUMMARY OF PARENT SURVEY DATA

Name of Private School: Sununu Youth Services Center		
Total number of surveys sent: 23	Total # of completed surveys received: 1	Percent of response: 4%

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)	1			
2. My child has opportunities to interact with non-disabled peers on a regular basis unless the IEP team has determined that the interaction is not appropriate/reasonable.	1			
3. I am informed on a regular basis and with clear evidence of my child’s progress in the general education curriculum.	1			

4. I understand that a variety of information (observations, test scores, results of evaluations, school work samples, behavioral data, etc) was considered in developing my child's IEP for this placement.	1			
5. I am satisfied that there is a direct connection between my child's needs and the components of his/her IEP and the supports and services ("reasonably calculated to provide educational benefit").	1			
6. I am satisfied that the sending school district has fully considered the Least Restrictive Environment in recommending this placement for my child (to the maximum extent appropriate, my child is educated with non-disabled peers).	1			
7. I know whom to contact if I have questions about my child's placement or progress in this program.	1			
8. I am satisfied that the staff of this placement worked collaboratively with my school district in developing my child's current IEP.	1			
9. I have been involved in the development of my child's IEP.	1			
10. I am satisfied that my child is making progress toward his/her IEP goals	1			
FOR PARENTS OF HIGH SCHOOL STUDENTS ONLY:				
11. My child earns credits toward a regular high school diploma in all of his/her classes.	1			
12. My child will graduate with a high school diploma	1			
TRANSITION:				
13. I am satisfied with the planning and support provided for my child as he/she moves from grade to grade, school to school, public school to private school.	1			
14. All of the people who are important to my child's transition were part of the planning (grade appropriate).	1			
15. All of the people/agencies who are required to be part of transition planning for my child were part of the transition process.	1			
16. FOR PARENTS OF STUDENTS AGE 16 OR OLDER ONLY: I am satisfied that my child's IEP meets all the requirements of Secondary Transition: measureable post-secondary goals, necessary supports and services, age-appropriate transition assessments, specific invitation to the Transition meeting, etc. (DOE Indicator #13)	1			
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			
BEHAVIOR STRATEGIES AND DISCIPLINE:				
18. My child's classroom behaviors affect his/her ability to learn. <i>If the answer is yes, please answer the next two questions. If no, skip to OTHER.</i>	YES		NO	
	3	2	1	No Answer
19. I have been involved in the development of behavior interventions, strategies and supports for my child.			1	
20. I am satisfied with the way the school is supporting my child's behavioral, social and developmental needs.	1			
OTHER:				
21. I fully participate in special education decisions regarding my child.	1			
22. I have been provided with a copy of the procedural safeguards (parental rights) at least once a year	1			

MY CHILD'S GRADE LEVEL IS (circle one): preschool elementary middle school high school

What suggestions would you offer to the school that would improve your child's education?

More one-on-one she needs. Can't focus in large groups.

Analysis of Parent Survey Responses by Sununu Youth Services Center:

Twenty-three parents were sent the survey with a stamped self-addressed return envelope provided. Due to the low response (1) the SYSC administration was unable to identify patterns of strength and concern.

**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

Access to the General Curriculum has been provided to SYSC students. The SYSC administrators and staff communicate quickly and efficiently with the student's LEA to determine the student's current learning needs and placement information to ensure that students are given access to the appropriate course content at their learning level. Students are administered the Woodcock Johnson Achievement test upon placement to provide the SYSC staff with most current level of academic learning.

Students with an IEP are integrated into classrooms with general education students. The class sizes range from approximately eight students to two or three and course work is conducted with whole and small group, as well as individual instruction. The school day is organized around a six period school day. Accommodations and, in some cases, Modifications are provided as indicated by the student's IEP.

An area of success and engagement for the SYSC students, as reported by students, guardians and staff, and LEA representatives, is in the vocational classes that provide hands-on, real life experiences for students in automotive, culinary and the school store.

The administrators and faculty at SYSC have been in the process of updating the school's curriculum to reflect alignment with the Common Core State Standards and the NH Minimum Standards for School Approval this year. The curriculum development process is currently conducted by individual content teachers and, while the current revisions include some well developed components in content areas, there is a lack of consistency and continuity in the school wide curriculum design and implementation. The leadership indicates that as work continues in the area of curriculum a common format and approach will be instituted with facilitated oversight to ensure the ongoing high quality curriculum, instruction and assessment practices provided for the SYSC students.

SYSC maintains a transcript of course work completed for each student enrolled but does not offer an SYSC diploma.

Transition

Transition Planning

Process: Provision of Free Appropriate Public Education (FAPE)

Transition Services

Student placement at SYSC is by Court Order only. The transition process is designed to be quickly responsive as soon as a student is placed at the school. The LEA is contacted within 2 days of court placement and requests are made for the student's IEP and most recent evaluation, meeting minutes, Written Prior Notice, and other information as needed. SYSC utilizes Court Stream a computer-based program that documents student behavior and movements and can be accessed by all SYSC relevant staff. The communication and collaboration system developed and refined over time is found to be efficient and effective in gathering essential academic, social and behavioral information from the local school district and in providing the required services and supports indicated in a student's IEP. The LEA and the SYSC team work together to review and make any revisions determined by the team to be necessary. In one case the visiting team found that a related service was not provided in a timely manner during a summer placement. This finding is noted in the Compliance section of this report.

Transition planning begins immediately upon arrival at SYSC and is reviewed and adjusted as needed at every IEP and Treatment Team meeting. Students are provided with interest inventory or vocational assessments as indicated. The transition planning includes agencies and other relevant members such as Vocational Rehabilitation and the student's JPPO as appropriate.

The length of stay for SYSC students has shortened in recent years as a result of the DCYF home-based philosophy of keeping students in the home to the greatest extent possible. Currently student placements last for four, six or nine months. Students are included in IEP meetings, as appropriate and are participants in transition planning goal setting. Placement back to the local school district is dependent on the decision of the Court and may leave little time for extended transition prep. However, the SYSC staff communicate student academic and social/behavioral information in a timely manner to the LEA, including an updated transcript of potential credits earned while enrolled at SYSC. Credits are awarded by the local district.

Behavior Strategies and Discipline

SYSC has intentionally focused efforts on a shift to positive-based incentive model with the intent of becoming a more rehabilitative center. SYSC was the first state run facility for committed youth to remove isolation from its practice. As a result of this and other recent, positive-based activities and reward and recognition initiatives (e.g. student of the month, art exhibits, Holiday Fair, etc.), the number of minimal assaults and infractions has decreased.

The addition of the "Removal Room" an in-school time out space has been effective in decreasing student behaviors. Students were previously returned to the Unit for behavior incidents. Maintaining students within the school facility and providing them with a process for decompression has been beneficial to the improved culture, climate and specific student behaviors.

The agency administrators report that while the national arrest rate for youth is down there has been an increase in court placement of students with diagnosis of Posttraumatic Stress Disorder, and one or more additional mental health diagnosis' who have committed juvenile acts, resulting in an increase in students requiring significant mental health treatment.

At the time of this NHDOE visitation the position of School Psychologist had been cut as a result of budget limitations. Student counseling and supports are currently provided by the SYSC School Counselor.

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 Sununu Youth Services Center 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 following commendations come as a result of the NHDOE Case Study Compliance visit to SYSC on January 12 & 13, 2015. A visiting team representing public and non-public school administrators, as well as DCYF and the Bureau of Special Education, had the opportunity to hear two Case Studies of randomly selected SYSC students; tour the school; observe Case Study students in the classroom setting; interview Case Study parents/guardians and students and meet with teachers and school administrators. The result of the collective review of the SYSC programs, student work and progress, curriculum, instruction and assessment practices as well as behavior management processes the following commendations are made.

- The SYSC teachers develop individualized instruction to meet students learning needs and continue the education they were receiving prior to court placement.
- The SYSC teachers are adept at accommodating and including this constantly changing school population in individualized and small group instruction.
- The school has a well-established record for supporting students in the relevant course work and classes that result in earned credits toward high school graduation. The visiting team observed a high rate of engagement among the students in the classrooms observed.
- The students interviewed expressed a sense of support from the SYSC teachers and staff.
- The guardians interviewed expressed very positive feelings about their student's social and academic growth while at SYSC.
- The visiting team observed well-developed partnerships with members of the sending LEAs so that collaboration in transition planning and process is coordinated and communicated efficiently.

The SYSC administration and staff have focused on developing a clearer rehabilitative environment instead of a punitive based response. The use of positive based incentives to support the students in developing coping and response skills has resulted in improved outcomes (e.g. minimal assaults, less negative behavior incidents).

Number of Cases Reviewed During the Sununu Youth Services Center, January 12 & 13, 2015, NHDOE Compliance Visitation

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

FINDINGS OF NONCOMPLIANCE IDENTIFIED AS A RESULT OF THE JANUARY 12 & 13, 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.**

This section will need to include any findings of noncompliance noted in the three focus areas, issues of significance, building summaries or general review of policy, procedures, personnel roster, etc.

Issues of significance are defined as systemic deficiencies that impact the effective delivery of services to all students, including those with educational disabilities. Examples of such may include system wide issues related to curriculum, instruction and assessment.

Child Specific Findings of Noncompliance to be Addressed by Both the LEA and Private School

Setting: Please Note: *The NH Department of Education, Bureau of Special Education requires that Child Specific Findings of Noncompliance be addressed and resolved within 45 days of notification.*

ED1109.01(a)(1) Elements of an Individual Education Program, 34CRF 300.320(a) Definitions of individualized education programs.

Responsible LEA: Goffstown

Three out of three goals reviewed were not written in measurable terms.

ED1109.04(b)(1) Copies of the IEP and evidence of implementation

Responsible LEA: Goffstown

Student was not provided with all related services upon placement.

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 1119.03 Full Access to the General Education Curriculum – Not all areas of required staff or consultants are in place at SYSC. These include the positions of: Library Media Specialist, Family and Consumer Science, Technology Education and World Language.

ED 1119.03 Full Access to the General Education Curriculum – The SYSC curriculum does not include a Middle School Curriculum.

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 how to better define the middle school program structure to clearly articulate the middle school courses and separate activities provided.
2. Consider how to facilitate the continued development of the SYSC curriculum to support the teachers in the consistent development and implementation of the updated curriculum document.
3. Consider a review of the course descriptions and a development of a Course of Study to update the terminology utilized and to clarify the course offered so better inform the LEA, the student and the parent in course selection and completion.

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: Sununu Youth Services Center	Date: January 12 & 13, 2015	
Programs: Sununu Youth Services Center	Number of Cases Reviewed: 2	
Recorder/Summarizer: Maryclare Heffernan	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: Claire Pstragowski	Position: Principal	Building Level
Name: Angela Keef	Position: Education Consultant DCYF	Visiting
Name: Ann Roberts	Position: Special Education Coordinator	Building Level
Name: Kevin Murphy	Position: Executive Director	Visiting
Name: Penny Sampson	Position: SYSC Director	Building Level
Name: Marie Sullivan	Position: Special Education Teacher	Building Level
Name: Jeanne Saunders	Position: Director of Special Services	Visiting
Name: Joseph Miller	Position: Education Consultant	Visiting
Name: Maryclare Heffernan	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 ¹ .	2		
2. There is evidence of a system among <i>all</i> staff members who provide direct services for the child, including instructional and residential, of their participation in the process of planning for that child and knowing the contents of the IEP and all other reports and evaluations, as appropriate to their roles and responsibilities ² .	2		
3. There is evidence that the Team uses multiple measures to design, implement and monitor the student's program ^{3,4} .	1	1	
4. All IEP goals are written in measurable terms ⁵ .	1	1	
5. Student's IEP has at least one functional goal (as applicable) ⁶ .	2		
6. There is evidence that the student has made progress in IEP Goals over the past three years ^{7,8} .	2		
7. There is evidence that the special education, supplementary aids and/or related services described in the IEP have been delivered ⁹ .	1	1	
8. There is evidence that NH Minimum Standards for required subjects (credits) are met and provided to the student ¹⁰ .	2		

¹ Ed 1109.03 When an IEP Is in Effect; IEP Meetings; Development, Review, and Revision of an IEP; Transition Services; 34 CFR 300.324 Development, review, and revision of IEP

² Ed 1114.05(h) Program Requirements

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

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

⁵ Ed. 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

⁶ Ed 1102.01(u) Definitions Functional Goal *Functional goal* means a measurable outcome that is developed by the IEP team to address a need detailed in the analysis of the student's functional performance

⁷ Ed 1109.01 Elements of an IEP

⁸ Ed 1109.03 When an IEP Is in Effect; IEP Meetings; Development, Review, and Revision of an IEP; Transition Services; 34 CFR 300.324 Development, review, and revision of IEP

⁹ Ed 1109.04 (b) Copies of the IEP and evidence of implementation

¹⁰ Ed 1114.05 (g) Program Requirements 34 CFR 300.320 Content of IEP

9. There is evidence the student <u>has access to, is participating and progressing in the general education curriculum (aligned with NH Curriculum Frameworks/CCSS)</u> ¹¹ .	2		
10. There is evidence that the accommodations ¹² and/or modifications ¹³ , as described in the IEP allows the student to access, participate and show progress in the general curriculum ¹⁴ .	2		
11. There is evidence in the IEP of individual accommodations necessary to measure academic achievement or functional performance in state, school-wide or classroom assessments ^{15, 16} .	2		
12. There is evidence that supports and accommodations are provided to this student to allow participation in extracurricular and other non-academic activities ¹⁷ .	2		
13. There is evidence that the IEP team made the placement decision based on Free and Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE) ¹⁸ .			2
14. There is evidence the student's IEP is reasonably calculated to result in educational benefit.	2		
For High School Students:			
Student is earning credits toward a regular high school diploma ¹⁹ .	2		
IF YES: within 4 years?	1	1	
Student will earn an IEP diploma or a certificate of completion ¹⁹ .		2	
IF YES: within 4 years?		2	
Does this school have a clear policy for earning a high school diploma ²⁰ ?			2

¹¹ Ed 1113.08 Curricula; Ed. 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

¹² "Accommodation" means any change in instruction or evaluation determined necessary by the IEP team that does not impact the rigor and/or validity of the subject matter being taught or assessed.

¹³ "Modification" means any change in instruction or evaluation determined necessary by the IEP team that impacts the rigor and validity or rigor or validity, of the subject matter being taught or assessed.

¹⁴ Ed 1113.08 Curricula; Ed. 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

¹⁵ Ed 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

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

¹⁷ Ed 1113.08 Curricula; Ed 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

¹⁸ Ed 1111.02 Placement Decisions; 34 CFR 300.116 Placements

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

²⁰ Ed 1114.05 Program Requirements (a)(b)

Access Strengths	Access Suggestions for Improvement
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<ul style="list-style-type: none"> • The SYSC teachers develop individualized instruction to meet students learning needs and continue the education they were receiving prior to court placement. • The SYSC teachers are adept at constantly accommodating and including this constantly changing school population. • The visiting team observed a high rate of engagement among the students in the classrooms observed. • The school has a well-established record for supporting students in the relevant course work and classes that result in earned credits toward high school graduation. • There is a reasonable student teacher ratio within the SYSC classes. • The students interviewed expressed a sense of support from the SYSC teachers and staff. • The vocational courses offered are highly valued by the students and staff. • The guardian’s interviewed expressed very positive feelings about their student’s social and academic growth while at SYSC. 	<ul style="list-style-type: none"> • Develop an updated school-wide curriculum that is consistently designed and utilized by all relevant teachers and staff. The school does have a curriculum in place yet the visiting team agreed that updating and institutionalizing a curriculum that aligns with NH College and Career Ready Standards would be beneficial to teachers and students. • Design a comprehensive SYSC Program of Studies that describes and makes clear the range of courses aligned with NH Minimum Standards are available to SYSC students. This will facilitate the transition to and from SYSC and further ensure that the student’s course selection and transfer of credits for back to the sending district is appropriate and understood by all parties. • Explore possible ways to increase access to technology for both the students and staff. While the visiting team understood the challenges in the use of online access to technology the consensus was that increased access may be available for students as appropriate as a way to further increase student access to curriculum. • Explore additional vocational course experiences for students. The students and parents expressed high value and relevancy in the vocational courses currently offered. The building trades and business courses are not currently offered. • Review the current use of available staff to determine if other patterns of staff utilization may provide greater efficiency. The recent reduction in staffing patterns has resulted in a shift in staffing utilization at this time. • Consider conducting a faculty summer retreat to provide the facilitation, time and space necessary for quality and consistent curriculum development. Currently the faculty is attempting to work alone on individual curriculum design without a connection to other subject areas and without collective vision and shared expertise. • Continue to seek the assistance of a clerical position to support the significant documentation and paperwork required for this population of transient SYSC students.
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TRANSITION STATEMENTS²¹

²¹ This includes movement from (a) Early Supports and Services (ESS) to preschool, b) preschool to elementary school, or (c) age 16 or older, as well as from grade to grade and school to school.

Fill in the combined <u>number</u> of times a statement is marked on all Data Collection Forms for this school or building.	YES	NO
	1. There is evidence that at the time of transition the evaluation summary and other related documents were received in a timely manner ²² .	2
2. There is evidence and documentation that special education, supplementary aids and/or related services described in the IEP were delivered at the time of transition ²³ .	2	
3. There is evidence that the information on this student has been shared between each transition including school to school, grade to grade and teacher to teacher including academic and behavior ²⁴ .	2	
4. There is evidence that the placement decision is made at least annually by the IEP team with consideration that the student is placed in the least restrictive environment ²⁵ .	2	
5. There is evidence that there is collaboration between the LEA and the non-public school in the development, review and revision of the IEP ²⁶ .	2	
6. There is evidence of a collaboration process between general and special education staff in the development, review and revision of IEPs, including transition planning for this student ²⁷ .	2	
7. There is evidence that the student and parents have been involved in transition discussions and activities ²⁸ .	2	
8. If the student turned 14 during the IEP period (or younger if determined by the IEP team), there is evidence that the IEP includes a statement of transition service needs that focuses on the students courses of study ²⁹ .	2	
9. If the student turned 16 during the IEP period, there is evidence that the transition plan is designed within a results-oriented process focused on improving academic and functional improvement to facilitate his or her movement from school to post-school goals and activities ³⁰ .	2	

²² 34 CFR 300.323(g) Transmittal of records

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

²⁴ Ed 1114.05 Program Requirements

²⁵ Ed 1111.02 Placement Decisions; 34 CFR 300.116 Placements

²⁶ Ed 1109.05 IEPs for Children Placed in Private Providers of Special Education or other non-LEA Programs by Public Agencies; 34 CFR 300.325 Private school placements by public agencies

²⁷ Ed 1103.01 IEP Team; 34 CFR 300.321 IEP Team

²⁸ Ed 1103.01 IEP Team; 34 CFR 300.321 IEP Team

²⁹ Ed 1109.01 (10) Elements of the individualized education program

³⁰ Ed 1109.01 (a)(10) Elements of an IEP; 34 CFR 300.320 Definition of an IEP (b); 34 CFR 300.43 Transition Services (a)(1)

10. There is evidence that outside agencies who are involved with this student's transition have participated in transition planning (e.g. DCYF, DJJS, and Area Agency) ³¹ .	2	
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TRANSITION STATEMENTS	YES	NO
(Transition questions must be answered Yes or No, not N/A)		
For a student who will turn age 14 during the IEP service period (or younger if determined appropriate by the IEP team): The IEP includes a statement of the transition service needs that focuses on the student's course of study, such as participation in advanced-placement courses or a vocational education program		
For students under age 16, answer only the first 4 statements above. Then skip to the next page. If the student is age 16 or older during the course of the IEP, answer all statements on this page. (required data for federal statistics purposes)		
1. Is there an appropriate measurable postsecondary goal or goals that covers education OR training AND employment, and, as needed, independent living?	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	
<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)? • If yes, then check Y OR if no, then check N.</i>		
5. Do the transition services include courses of study that will reasonably enable the student to meet his or her postsecondary goal(s)?	2	

³¹ Ed 1103.01 IEP Team; 34 CFR 300.321 IEP Team

<i>Do the transition services include courses of study that align with the student's postsecondary goal(s)?</i> • If yes, then check Y OR if no, then check N.			
6. Is (are) there annual IEP goal(s) related to the student's transition services needs?	2		
<i>Is (are) an annual goal(s) included in the IEP that is/are related to the student's transition services needs?</i> • If yes, then check Y OR if no, then check N.			
7. Is there evidence that the student was invited to the IEP Team meeting where transition services were discussed?	2		
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> • If yes, then check Y OR if no, then check N.	2		
Only the following statement may be answered N/A if appropriate. All statements above must be answered Yes or No.	YES	NO	N/A
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?	2		
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> • If yes to both, then check Y. • If no invitation is evident and a participating agency is likely to be responsible for providing or paying for transition services and there was consent to invite them to the IEP meeting, then check N. • If it is too early to determine if the student will need outside agency involvement, or no agency is likely to provide or pay for transition services, check NA. • If parent or individual student consent (when appropriate) was not provided, check NA.	2		
11. Student is informed prior to age 17 of his/her rights under IDEA ³² .	2		
12. Does the IEP meet the requirements of Indicator 13? (Check one) Yes (all Ys or NAs for each item (1 – 10) on the Checklist or No (one or more Ns checked)	2		
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 ³³ .			2

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

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

Transition Strengths	Transition Suggestions for Improvement
<ul style="list-style-type: none"> • The SYSC staff begin transition planning at the time a student is placed at the center. Transition planning happens on an ongoing basis for each student. • The visiting team observed well-developed partnerships with members of the sending LEAs, DCYF representatives and JPPO's so that collaboration in transition planning and process is coordinated and communicated efficiently. • The students who participate and complete a vocational/career education course are granted a job title certificate (e.g. cashier) specific to the skills mastered, that they can use when applying for employment. • The consistent use of vocational interest inventories and assessments is helpful to students in planning for transition. • The school staffs were observed utilizing a strengths-based perspective with students, focusing on current and potential strengths and skills. 	<ul style="list-style-type: none"> • Explore options for increasing the range of vocational/career education courses for SYSC students. The students interviewed consistently indicated that the hands-on, real life, transferable skills were interesting and meaningful to them. • Explore options for reinstating the building trades and marketing courses that have been recently not available. • Consider how to increase the collaboration with Vocational Rehabilitation to increase opportunities for students and parents to become aware of options available to them. • Review the process for ensuring that students are provided notice of their rights under IDEA prior to age 17. • Explore the possibility of integrating the RENEW process into the SYSC for the purpose of creating intensive transition supports and services for those students who may require greater individualized transition interventions. • Explore potential access to the new Job Corp program as a possible transition resource for SYSC students. This may be particularly relevant once the 17 year-old students are returned to SYSC on July 1, 2015.

BEHAVIOR STRATEGIES AND DISCIPLINE

Fill in the combined <u>number</u> of times a statement is marked on all Data Collection Forms for this school or building		
	YES	NO
1. There is evidence that, where it has been determined that a child's behavior impedes learning, the use of positive behavioral interventions and supports, and other strategies to address that behavior have been implemented ³⁴ .	2	
2. There is evidence that data are used to determine impact of student behavior on his/her learning.	2	
3. There is evidence that the IEP team conducted a functional behavior assessment of the student's behavior ³⁵ .	2	
4. If appropriate, there is evidence that the IEP team developed a behavior intervention plan that described strategies and supports ³⁶ .	2	
5. There is evidence that the interventions, strategies and supports have been developed to address the student's behavior ³⁷ .	2	
6. There is evidence that positive interventions, strategies and supports been communicated to the student, parents and key school personnel ³⁸ .	2	
7. There is evidence that professional development, and specialized training has been provided to staff, parents, providers and others as appropriate to support the implementation of the behavior plan and strategies ³⁹ .	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 ^{40,41} .	2	
9. There is evidence that that the team uses data to demonstrate the results of the behavioral interventions, strategies and supports ⁴² .	2	
10. A school-wide behavior intervention model exists.	2	

³⁴ Ed 1114.07 Behavioral Interventions; Ed 1109.01 Elements of an IEP; 34 CFR 300.320 Content of IEP

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

³⁶ Ed 1102.01 Definitions (n)

³⁷ Ed 1114.07 Behavioral Interventions

³⁸ Ed 1114.05 Program Requirements

³⁹ Ed 1114.10 Qualifications and Requirements for Instructional, Administrative, and Support Personnel

⁴⁰ Ed 1113.06 (a)(b) Use of Aversive Behavioral Interventions "Aversive Behavioral Interventions" mean (1) A non-medical mechanical restraint that physically restricts student's movement; and (2) physical restraint, not in response to a threat of imminent, serious, physical harm.

⁴¹ Ed 1114.09 Use of Aversive Behavioral Interventions

⁴² Ed 1114.07 (a) Behavioral Interventions

Behavior Strategy Strengths	Behavior Strategy Suggestions for Improvement
<ul style="list-style-type: none"> • The SYSC administration and staff have focused on developing a clearer rehabilitative environment instead of a punitive based response. The use of positive based incentives to support the students in developing coping and response skills has resulted in improved outcomes (e.g. minimal assaults, less negative behavior incidents). • A number of positive incentive activities are available to students including: pet therapy dogs; working with tutoring volunteers from St. Anselm's College, the Public Achievement Group, etc. Students are recognized for accomplishments (e.g. student of the month, art work displayed on school walls, etc.). • The new school-based model of utilizing an internal removal room rather than the former practice of returning to the Unit has resulted in less students leaving the classroom and quicker returns if they do. • The leveled system of behavior appears to be an effective behavior management process for students. • The implementation of the Restorative Justice practice provides a positive and structured peer mediated process for problem solving and empowering students to own and resolve conflicts. 	<ul style="list-style-type: none"> • Consider how best to measure positive student behavior beyond school grades. • The current lack of a school psychologist in the school has presented challenges in meeting student social/emotional needs. Continue to work towards re-instating the position of school psychologist.