

**New Hampshire
Department of Education
Bureau of Student Support
Monitoring Review for Approval of
Private Provider Special Education
Programs**

**Sununu Youth Services Center
Summary Report
2018 – 2019**

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**Monitoring Visit Conducted on February 19, 2019
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Overview of the Sununu Youth Services Center Program

Sununu Youth Services Center is a New Hampshire Department of Education, Bureau of Student Support Approved Program located in Manchester, New Hampshire. The program is approved for grades 6 through 12 for up to 108 students with disabilities (for both in state and out of state students). Students enrolled in this program have primary disabilities in the areas of 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.

Noteworthy Practices and Areas in Need of Refinement

Noteworthy Practices

During the monitoring visit, it had been revealed that the Sununu Youth Services Center has facilities on site for a variety of vocational education training opportunities, including a culinary arts program which is currently open, operating, and available to students. In addition, Sununu Youth Services Center has facilities on site which includes a pool, automotive shop, and wood shop; however, these facilities are not available for students to access at this time.

These students are not able to leave the facility in order to obtain similar training in these vocational areas.

Areas in Need of Refinement

During the monitoring review of materials submitted, it had been revealed that Sununu Youth Services Center had some areas in need of refinement in regards to their Special Education Procedures Manual. The NHDOE identified these areas, and potential remedies. Whereas these practices do not rise to the standard of noncompliance, and therefore require no corrective actions, the NHDOE believes that the areas in need of refinement are noteworthy to be addressed.

- During the Monitoring Review, while reviewing Sununu Youth Services Center's Special Education Procedures, it was noted that the program included many policies which were relevant to the overall operations of the facility. The NHDOE recommends that Sununu Youth Services Center have special education policies and procedures which are specific to just the school.

Overview of the Monitoring Review for Approval of Special Education Programs Process

The Monitoring Review for Approval of Private Provider Special Education Programs process ensures that students with educational disabilities have access to; can participate in; and can demonstrate progress within the general education curriculum, thereby improving student learning. The primary focus of the monitoring review is to improve educational results and functional outcomes for all children with disabilities.

Monitoring is done on a cyclical basis. During the year prior to monitoring, the New Hampshire Department of Education (NHDOE), Bureau of Student Support (Bureau) offers training to each private provider who is involved in the monitoring process. Training encompasses writing Measurable Annual Goals, Written Prior Notice, Self-Assessment, and a topic selected by the private provider based on current need. During this time, the private provider will be given the option to include a director from outside of their Local Education Agency (LEA) area to participate in the on-site file review, as well as at least one special education administrator from another private school who has been trained in the process by the Bureau. At the beginning of the school year in which the private provider is being monitored, the private provider will send the Bureau their completed application for renewal of Bureau special education approval/nonpublic school approval in addition to the program's policy and procedure manual and any special education forms that are used by the private program. Following a review of these documents, the monitoring team will conduct an on-site review in which student files are examined for evidence of implementation of the policies and procedures through the special education process. The Bureau will also conduct a follow-up review to verify the implementation of corrective actions as defined in the summary report.

The New Hampshire Department of Education, Bureau of Student Support review members for Sununu Youth Services Center's on-site monitoring review included Lori Noordergraaf, and Rebecca Fredette.

Procedures and Effective Implementation

Each private provider must have special education procedures, and effective implementation of practices that are aligned and support the implementation of IDEA and the *New Hampshire Standards for the Education of Children with Disabilities*.

The monitoring team reviewed the following special education procedures for compliance with State and Federal regulations regarding administration, confidentiality of information, program requirements, responsibilities of private providers of special education implementation of IEPs, behavioral interventions, RSA 126-U Limiting the use of child restraint practices in schools and treatment centers, qualifications and requirements for instructional, administrative and support personnel, change in placement or termination of

enrollment, physical facilities, health and medical care, photography and audio-visual recording, and emergency planning and preparedness.

Based on the review of Sununu Youth Services Center's special education procedures the monitoring team determined there were **24 findings of noncompliance in 16 areas**.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
1. RSA 186-C:10-a	Retention of Individualized Education Programs
<p>Finding of Noncompliance: Sununu Youth Services Center included outdated citations and references in their procedure manual regarding the retention and destruction of records resulting in 1 finding of noncompliance.</p> <p>Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect the most recent updates regarding the retention and destruction of records.</p> <p>Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
2. 34 CFR 300.613	Access Rights
<p>Finding of Noncompliance: Sununu Youth Services Center did not include information regarding:</p> <ul style="list-style-type: none"> • the right to a response from a participating agency to reasonable request for explanations and interpretations of records, • the right to have a representative of the parent inspect and review the records, • an agency must presume the parent has authority to inspect and review records relating to his or her child unless the agency has been advised that the parent does not have the authority under applicable state law governing such matters of guardianship, separations and divorce <p>resulting in 3 findings of noncompliance.</p> <p>Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect the most recent updates regarding the retention and destruction of records.</p> <p>Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
3. 34 CFR 300.615	Records on More Than One Child
<p>Finding of Noncompliance: Sununu Youth Services Center did not include information around allowing parents to only inspect and review information relating to their child, resulting in 1 finding of noncompliance.</p> <p>Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect that parents can only inspect and review information relating to their child.</p>	

Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
4. Ed 1114.06(a)	Responsibilities of Private Providers of Special Education or Other Non-LEA Programs in the Implementation of IEPs
<p>Finding of Noncompliance: Sununu Youth Services Center did not include information regarding each private provider of special education or other non-LEA program shall, in all matters concerning possible changes and/or modifications in the identification, evaluation, development and/or revision of an IEP, or changes in placement of a child with a disability, contact the sending school district for the purpose of initiating the process for changing any of the above in compliance with Ed 1109.05, resulting in 1 finding of noncompliance.</p>	
<p>Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect that in all matters concerning possible changes and/or modifications in the identification, evaluation, development and/or revision of an IEP, or changes in placement of a child with a disability, contact the sending school district for the purpose of initiating the process for changing any of the above in compliance with Ed 1109.05.</p> <p>Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
5. Ed 1114.06(f)	Responsibilities of Private Providers of Special Education or Other Non-LEA Programs in the Implementation of IEPs
<p>Finding of Noncompliance: Sununu Youth Services Center did not include information regarding daily lesson plans being clear, concise and reflective of the IEP goals for each child. Goals shall reflect any staff input and related reports and evaluations provided by the agencies responsible for the student's education and welfare; resulting in 1 finding of noncompliance.</p>	
<p>Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect that daily lesson plans shall be clear, concise, and reflective of the IEP goals for each child. They shall reflect any staff input and related reports and evaluations provided by the agencies responsible for the student's education and welfare.</p> <p>Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
6. Ed 1114.06(h)	Responsibilities of Private Providers of Special Education or Other Non-LEA Programs in the Implementation of IEPs
<p>Finding of Noncompliance: Sununu Youth Services Center did not include information regarding when a private provider of special education or other non-LEA program determines that any child with a disability placed at the facility or program is not making progress toward meeting his or her IEP goals at the rate anticipated, the facility or program shall immediately contact the LEA for the purpose of reviewing the IEP and considering modifications, resulting in 1 finding of noncompliance.</p>	

Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect that when a private provider of special education or other non-LEA program determines that any child with a disability placed at the facility or program is not making progress toward meeting his or her IEP goals at the rate anticipated, the facility or program shall immediately contact the LEA for the purpose of reviewing the IEP and considering modifications.

Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
7. Ed 1114.07(b)	Behavioral Interventions
Finding of Noncompliance: Sununu Youth Services Center did not include information around providing policies around managing student behavior to parents and the sending LEA when the student becomes enrolled in the program, at the time of annual review and any time said policies are revised, resulting in 1 finding of noncompliance.	
Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect their procedure around providing sending LEA's and parents this information.	
Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
8. Ed 1114.07(f)	Behavioral Interventions
Finding of Noncompliance: Sununu Youth Services Center did not include information around not using contingent food/drink programs or electrical stimulation as part of their behavioral interventions resulting in 1 finding of noncompliance.	
Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedures Manual to reflect that these practices will not be used as part of their behavioral interventions.	
Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
9. Ed 1114.08	Emergency Intervention Procedures
Finding of Noncompliance: Sununu Youth Services Center did not include information to reflect that all crisis or emergency intervention procedures shall be included in the student's IEP and shall comply with Ed 1114.07 and RSA 126 U:5 resulting in 1 finding of noncompliance.	
Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect that all crisis or emergency intervention procedures shall be included in the student's IEP and shall comply with Ed 1114.07 and RSA 126 U:5.	

Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
10. Ed 1114.10(c)	Qualifications and Requirements for Instructional, Administrative, and Support Personnel
Finding of Noncompliance: Sununu Youth Services Center did not include information to reflect a written procedure for supervising and evaluating the performance of all staff members resulting in 1 finding of noncompliance .	
Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to include a written procedure for supervising and evaluating the performance of all staff members.	
Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
11. Ed 1114.12(a)	Change in Placement or Termination of the Enrollment of a Child With a Disability
Finding of Noncompliance: Sununu Youth Services Center did not include information to reflect that when the private provider of special education believes it can no longer provide FAPE they shall immediately convene or request a convening of the IEP team to review the facility's or program's concerns and to amend the IEP and placement as necessary resulting in 1 finding of noncompliance .	
Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect that when the private provider of special education believes it can no longer provide FAPE they shall immediately convene or request a convening of the IEP team to review the facility's or program's concerns and to amend the IEP and placement as necessary.	
Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
12. Ed 1114.12(b)	Change in Placement or Termination of the Enrollment of a Child With a Disability
Finding of Noncompliance: Sununu Youth Services Center did not include information to reflect that when an IEP meeting is convened under Ed 1114.12 it shall include: <ul style="list-style-type: none"> Review the child's needs Determine whether the current IEP meets the needs of the child and if appropriate, propose changes to the IEP Determine whether the placement can fully implement the child's IEP and provide FAPE, resulting in 3 findings of noncompliance. 	
Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect that when an IEP meeting is convened under Ed 1114.12 it shall include: <ul style="list-style-type: none"> Review the child's needs 	

- Determine whether the current IEP meets the needs of the child and if appropriate, propose changes to the IEP
- Determine whether the placement can fully implement the child's IEP and provide FAPE

Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
13. 1114.12(d)	Change in Placement or Termination of the Enrollment of a Child With a Disability
<p>Finding of Noncompliance: Sununu Youth Services Center did not include information to reflect that if a private provider of special education or other non-LEA program wishes to suspend or expel a child, it shall immediately inform the LEA. The LEA shall comply with the disciplinary procedures in 34 CFR 300.530-34 CFR 300-536. There is no mention of the LEA in the current policy regarding suspension and expulsion. This resulted in 1 finding of noncompliance.</p>	
<p>Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect that if a private provider of special education or other non-LEA program wishes to suspend or expel a child, it shall immediately inform the LEA.</p>	
<p>Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
14. Ed 1114.16(d)	Physical Facilities
<p>Finding of Noncompliance: Sununu Youth Services Center did not include information to reflect written procedures to protect children from the following hazards:</p> <ul style="list-style-type: none"> • Asbestos • Lead paint • Storage of hazardous materials • Vermin infestation • Storage of food <p>resulting in 5 findings of noncompliance.</p>	
<p>Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect written procedures to protect children from the following hazards:</p> <ul style="list-style-type: none"> • Asbestos • Lead paint • Storage of hazardous materials • Vermin infestation • Storage of food 	
<p>Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
15. Ed 1114.18(f)	Health and Medical Care
<p>Finding of Noncompliance: Sununu Youth Services Center did not include information to reflect that in the case of an accident injuring a child the private provider of special education will notify the sending LEA as well as the parent, the department and law enforcement. The LEA is not listed in the policy. This resulted in 1 finding of noncompliance.</p>	
<p>Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to that in the case of an accident injuring a child the private provider of special education will notify the sending LEA as well as the parent, the department and law enforcement. The LEA must be listed in the policy.</p>	
<p>Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
16. Ed 1114.18(g)	Health and Medical Care
<p>Finding of Noncompliance: Sununu Youth Services Center did not include information to reflect that in the case of the death of a child the private provider of special education will notify the sending LEA as well as the parent, the department and law enforcement. The LEA is not listed in the policy. This resulted in 1 finding of noncompliance.</p>	
<p>Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect that in the case of the death of a child the private provider of special education will notify the sending LEA as well as the parent, the department and law enforcement. The LEA must be listed in the policy.</p>	
<p>Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHDOE as soon as possible but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
17. Ed 1114.21(c)	Emergency Planning and Preparedness
<p>Finding of Noncompliance: Sununu Youth Services Center did not include information regarding the following conditions for each emergency drill:</p> <ul style="list-style-type: none"> • Record of emergency drills shall be maintained • All persons in the building shall participate in emergency drills • Emergency drills held at unexpected times and under varying conditions to prepare children for evacuation in case of fire or other emergencies • Provisions to ensure that all children with disabilities are evacuated safely • Establish procedures to help children with disabilities understand the nature of such drills <p>resulting in 5 findings of noncompliance:</p>	
<p>Corrective Action Regarding the Implementation of the Regulations: Sununu Youth Services Center must revise their Special Education Procedure Manual to reflect that the following conditions are included for each emergency drill:</p> <ul style="list-style-type: none"> • Record of emergency drills shall be maintained • All persons in the building shall participate in emergency drills • Emergency drills held at unexpected times and under varying conditions to prepare children for 	

evacuation in case of fire or other emergencies

- Provisions to ensure that all children with disabilities are evacuated safely
- Establish procedures to help children with disabilities understand the nature of such drills.

Provide the revised procedures manual, and a description of the method used to inform staff of the revision to the NHD OE as soon as possible but no later than 6 months from the date of this report.

Private Provider Curriculum and Effective Implementation

As part of the review, the monitoring team looked for evidence that Sununu Youth Services Center is providing students with access to the general curriculum. The monitoring team reviewed the grades 6 through 12 curriculum provided by Sununu Youth Services Center for compliance with learning areas in Arts Education, English/Language Arts, Health Education, Physical Education, Family & Consumer Science, Information & Communications Technologies, Mathematics, Science, Social Studies, and Technology Education, pursuant to Ed 306.261(b)(1) and (2) & Ed 306.27(c).

Based on the review of Sununu Youth Services Center's curriculum, the monitoring team determined that there were **59 findings of noncompliance in 14 areas.**

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
1. Ed 306.27	Program of Studies: Required Program Areas and Courses
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center's Program of Studies, the following courses were not included to meet the standards for graduation requirements:</p> <ul style="list-style-type: none"> • 1 Art Course • 3 Business Education Courses (courses need to include: Business Essentials, Business Technology Applications and Financial Literacy) • 2 Family and Consumer Science courses (courses need to be in the following areas: Foods and Nutrition, Human Growth and Development or Textiles and Design) • 1 Physical Education Course • 1 Technology Education Course • 2 Science Courses • 5 World Languages Courses <p>resulting in 15 findings of noncompliance.</p>	
<p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must revise its Program of Studies to include the following courses:</p> <ul style="list-style-type: none"> • 1 Art Course • 3 Business Education Courses (courses need to include: Business Essentials, Business Technology Applications and Financial Literacy) • 2 Family and Consumer Science courses (courses need to be in the following areas: Foods and Nutrition, Human Growth and Development or Textiles and Design) • 1 Physical Education Course • 1 Technology Education Course • 2 Science Courses • 5 World Languages Courses 	

Provide the updated Program of Study which includes the courses listed above and as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
2. Ed 306.27	Program of Studies: Required Program Areas and Courses
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center’s Program of Studies, there is no evidence of curriculum for the following courses listed in the Program of Study:</p> <ul style="list-style-type: none"> • Computer Applications • Maple Sugaring • Introduction to Film Studies • Algebra Skills • Algebra 2 • Applied Math • Geometry Skills • Geography • Introduction to Holocaust Studies • Law and Ethics <p>resulting in 10 findings of noncompliance.</p>	
<p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must submit curriculum for the following courses currently listed in their Program of Studies:</p> <ul style="list-style-type: none"> • Computer Applications • Maple Sugaring • Introduction to Film Studies • Algebra Skills • Algebra 2 • Applied Math • Geometry Skills • Geography • Introduction to Holocaust Studies • Law and Ethics 	
<p>Provide the updated curriculum for the courses as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
3. Ed 306.27	Program of Studies
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center’s Program of Studies, there is no evidence of an Introduction to Autoshop course however the curriculum was submitted for this course resulting in 1 finding of noncompliance.</p> <p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must revise its Program of Studies to include Introduction to Autoshop.</p> <p>Provide the updated Program of Study which includes Introduction to Autoshop as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
4. Ed306.261(b)(1)(j)	Kindergarten – Grade 8 School Curriculum: Technology Education
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center’s Technology Education Curriculum the curriculum does not address the program standards for digital portfolios resulting in 1 finding of noncompliance.</p> <p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must revise its Kindergarten – Grade 8 Technology Education Curriculum to include the program standards around digital portfolios.</p> <p>Provide the updated curriculum as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
5. 306.37(b)(3)(d&f)	Middle School English Language Arts Program Standards
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center’s Middle School English Language Arts Curriculum the following program standards were missing resulting in 4 finding of noncompliance:</p> <ul style="list-style-type: none"> • Increasing vocabulary skills through use of dictionary and structural analysis (prefix/suffix) • Remediation and enrichment programs • Critical thinking skills to solve problems and make informed decisions through research • Presenting information <p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must revise its English Language Arts Curriculum to include the following program standards:</p> <ul style="list-style-type: none"> • Increasing vocabulary skills through use of dictionary and structural analysis (prefix/suffix) • Remediation and enrichment programs • Critical thinking skills to solve problems and make informed decisions through research • Presenting information <p>Provide the updated Middle School English Language Arts Curriculum with the above mentioned standards as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
6. 306.38(b)(1)(e)	Middle School Family and Consumer Science Education Program Standards
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center’s Middle School Family and Consumer Science Education Curriculum and the following standard was not included: using critical thinking to solve problems and make informed decisions through research resulting in 1 finding of noncompliance.</p>	
<p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must revise its Middle School Family and Consumer Science Education Curriculum to include the use of critical thinking to solve problems and make informed decisions through research.</p> <p>Provide the updated Middle School Family and Consumer Science Education Curriculum as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
7. Ed 306.43(b)(4,5,6 & 8)	Middle School Mathematics Program Standards
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center’s Middle School Mathematics Curriculum the following program standards were missing resulting in 4 finding of noncompliance:</p> <ul style="list-style-type: none"> • Opportunities for all students to explore the historical and cultural development of mathematics • Explore mathematics related careers and have direct interaction with mathematics involved in various careers • Activities that promote developing mathematical concepts from the concrete to the representational and finally to the abstract level • Sustained projects and labs are designed to incorporate multiple mathematical ideas, research, technology, mathematical communication and interdisciplinary interaction 	
<p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must revise its Middle School Mathematics Education Curriculum to include the following Program Standards:</p> <ul style="list-style-type: none"> • Opportunities for all students to explore the historical and cultural development of mathematics • Explore mathematics related careers and have direct interaction with mathematics involved in various careers • Activities that promote developing mathematical concepts from the concrete to the representational and finally to the abstract level • Sustained projects and labs are designed to incorporate multiple mathematical ideas, research, technology, mathematical communication and interdisciplinary interaction <p>Provide the updated Middle School Mathematics Curriculum with the missing program standards as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
8. Ed 306.45(c)(3) and (4)(a,b,g & h)	Middle School Science Education Program Standards
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center’s Middle School Science Education Curriculum and the following program standards were missing resulting in 5 finding of noncompliance:</p> <ul style="list-style-type: none"> • Opportunities for students to develop a knowledge and understanding of process skills such as observing, classifying, measuring, graphing, inferring, experimenting, and communicating • Systemic instruction, laboratory experiences and activities designed to enable students to: <ul style="list-style-type: none"> ○ Gather scientific data through laboratory and field work ○ Employ safe practices and techniques in the laboratory and on field trips ○ Acquire and understanding of the history of science and its impact on society and the realization that science is a human endeavor ○ Become familiar with science and technology related careers 	
<p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must revise its Middle School Science Education Curriculum to include the following Program Standards:</p> <ul style="list-style-type: none"> • Opportunities for students to develop a knowledge and understanding of process skills such as observing, classifying, measuring, graphing, inferring, experimenting, and communicating • Systemic instruction, laboratory experiences and activities designed to enable students to: <ul style="list-style-type: none"> ○ Gather scientific data through laboratory and field work ○ Employ safe practices and techniques in the laboratory and on field trips ○ Acquire and understanding of the history of science and its impact on society and the realization that science is a human endeavor ○ Become familiar with science and technology related careers 	
<p>Provide the updated Middle School Science Curriculum with the missing standards as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
9. 306.46	Middle School Social Studies Standards
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center’s Curriculum the material submitted for Middle School Social Studies does not constitute a curriculum resulting in 1 finding of noncompliance.</p>	
<p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must submit a Middle School Social Studies Curriculum for all required Middle School Social Studies Standards.</p>	
<p>Provide the curriculum as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
10. 306.47	Middle School Technology/Engineering Education Program Standards
Finding of Noncompliance: In reviewing Sununu Youth Services Center's Curriculum the material submitted for Middle School Technology/Engineering Education Curriculum does not constitute a curriculum resulting in 1 finding of noncompliance.	
Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must submit a Middle School Technology/Engineering Curriculum for all required Middle School Technology/Engineering Education Standards.	
Provide the curriculum as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
11. Ed 306.33	High School Business Education Program Standards
Finding of Noncompliance: In reviewing Sununu Youth Services Center's Curriculum the material submitted for High School Business Education Curriculum does not constitute a curriculum resulting in 1 finding of noncompliance.	
Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must submit a High School Business Education Curriculum for all required High School Business Education Standards.	
Provide the curriculum as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
12. Ed 306.37	High School English Language Arts Program Standards
Finding of Noncompliance: In reviewing Sununu Youth Services Center's Curriculum the material submitted for High School English Language Arts Curriculum does not constitute a curriculum resulting in 1 finding of noncompliance.	
Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must submit a High School English Language Arts Curriculum for all required High School English Language Arts Education Standards.	
Provide the curriculum as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
13. Ed 306.43(c)(1)(a,d),(2),(3)(a),(4-12)	High School Mathematics Program Standards
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center’s Curriculum for High School Mathematics the following program standards were not included resulting in 10 findings of noncompliance:</p> <ul style="list-style-type: none"> • Learning multiple strategies to solve problems • Connecting mathematical ideas across multiple disciplines • Activities that involve the use of manipulatives, technology and interactions with the environment • Activities involving student decision making and questioning • Historical and cultural development of mathematics • Researching math-related careers, careers that involve math, and math requirements for college • Activities that promote the development of math concepts from concrete to representational to abstract through activities • Opportunities to develop multiple ways to approach and solve mathematical situations, appreciation of mathematical patterns, and the ability to make predictions from patterns • Projects and labs designed to incorporate multiple mathematical ideas, research, technology, mathematical communication, and interdisciplinary interaction, and to encourage students to solve problems that are meaningful and unique to their lives • Activities for solving problems outside of the classroom 	
<p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must submit a High School Mathematics Education Curriculum that includes the following program standards:</p> <ul style="list-style-type: none"> • Learning multiple strategies to solve problems • Connecting mathematical ideas across multiple disciplines • Activities that involve the use of manipulatives, technology and interactions with the environment • Activities involving student decision making and questioning • Historical and cultural development of mathematics • Researching math-related careers, careers that involve math, and math requirements for college • Activities that promote the development of math concepts from concrete to representational to abstract through activities • Opportunities to develop multiple ways to approach and solve mathematical situations, appreciation of mathematical patterns, and the ability to make predictions from patterns • Projects and labs designed to incorporate multiple mathematical ideas, research, technology, mathematical communication, and interdisciplinary interaction, and to encourage students to solve problems that are meaningful and unique to their lives • Activities for solving problems outside of the classroom 	
<p>Provide the curriculum as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.</p>	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
14. Ed 306.45	High School Science Education Program Standards
<p>Finding of Noncompliance: In reviewing Sununu Youth Services Center’s Curriculum for High School Science the following program standards were not included resulting in 4 findings of noncompliance:</p> <ul style="list-style-type: none"> • Learn process skills such as observation, hypothesizing, experimentation, and the drawing of conclusions • Gather scientific data through laboratory and field work • Communicate observations and experimental results both quantitatively, through the use of mathematical relationships, and qualitatively • History of science and the impact on society and science as a human endeavor 	
<p>Corrective Action regarding the Implementation of the Regulations: Sununu Youth Services Center must submit a High School Science Curriculum that includes the following program standards:</p> <ul style="list-style-type: none"> • Learn process skills such as observation, hypothesizing, experimentation, and the drawing of conclusions • Gather scientific data through laboratory and field work • Communicate observations and experimental results both quantitatively, through the use of mathematical relationships, and qualitatively • History of science and the impact on society and science as a human endeavor 	
<p>Provide the curriculum as well as a description of the method used to inform staff of the revision to the NHDOE as soon as possible, but no later than 6 months from the date of this report.</p>	

Personnel

The Bureau of Special Education has reviewed Sununu Youth Services Center personnel certifications using the New Hampshire Educator Information System. The review process was for educators employed during 2018 – 2019 school year.

The personnel roster that was provided by Sununu Youth Services Center was compared to the data in the New Hampshire Educator Information System. Each personnel member’s endorsement was compared to the subject/assignment. This process was used for personnel that hold Beginning Educator Certification (BEC) and Experienced Educator Certification (EEC). If the endorsement was appropriate to the subject/ assignment, then the renewal date of the endorsement was verified to ensure that the endorsement was current.

If there was a discrepancy between endorsement and the subject/assignment, the private provider was given an opportunity to verify the data. If the discrepancy could not be resolved a finding of noncompliance was made based on Personnel Standards pursuant to Ed 1114.10(a), 34 CFR 300.18, and 34 CFR 300.156.

Based on the review of Sununu Youth Services Center's personnel certifications, the monitoring team determined there were **no findings of noncompliance.**

Approval Requirements

Each private provider must meet the requirements for special education program approval pursuant to The Individuals with Disabilities Education Improvement Act (IDEA) (2004), The New Hampshire Standards for the Education of Children with Disabilities, and New Hampshire State Statutes (RSA 186-C:5, RSA 189:64). If seeking nonpublic school approval each private provider must meet the requirements of The New Hampshire Rules for the Approval of Nonpublic Schools (Ed 400, 2005).

The monitoring review for the approval of private provider special education programs includes an application with specified materials that must be submitted to the Bureau by October 15 in the year they are monitored.

Based on the review of the Sununu Youth Services Center's application materials, the monitoring team determined there were **no findings of noncompliance**.

Monitoring of the Implementation of Special Education Process

Private providers are responsible for implementing the special education process in accordance with IDEA and the *New Hampshire Standards for the Education of Children with Disabilities*. The self-assessment data collection form highlights the private providers' understanding of the requirements of IDEA and the *New Hampshire Standards for the Education of Children with Disabilities* and was reviewed during the monitoring visit. Each area of compliance on the self-assessment data collection form clearly outlines whether the compliance is either a requirement of both IDEA and the *New Hampshire Standards for the Education of Children with Disabilities* or a requirement of solely the *New Hampshire Standards for the Education of Children with Disabilities*. The private provider cites the evidence of compliance in the self-assessment prior to the monitoring visit. During the monitoring visit, the monitoring team verified the evidence of compliance based on review of the student file, using the private providers' self-assessment as a resource. In the case of student specific finding(s) of noncompliance, the sending District is cited for noncompliance, as well as the private provider.

Based on this review, the Bureau of Student Support identified findings of noncompliance with IDEA and the *New Hampshire Standards for the Education of Children with Disabilities*. The findings include the citation, the area of noncompliance, and the required corrective actions, which include timelines for demonstrating correction of noncompliance. Student specific information will not be included in the report but will be provided to the private provider and, when appropriate, a district's Administrator of Special Education.

There are two main components to the corrective actions entitled, "*Corrective Action of Individual Instance of Noncompliance*" and "*Corrective Action Regarding the Implementation of the Regulations*". The first component, "corrective action of individual instance of noncompliance," is for any noncompliance concerning a child-specific requirement. There

must be evidence that the private provider has corrected each individual case of noncompliance, unless the child is no longer placed at the program. These areas must be corrected as soon as possible with state timelines given in the report for each area. The Bureau will return to the program, typically within 3 months of the date of the report, to verify compliance for each individual instance identified in the report. The second component, “corrective action regarding the implementation of the regulations” would typically involve the private provider’s participating in professional development training to appropriate personnel with regards to areas found to be in noncompliance. The Bureau will review updated data collected after the identification of noncompliance to demonstrate that the program is correctly implementing the specific requirement. This involves a follow-up on-site review of new student files, selected typically within one year of the original on-site compliance & improvement monitoring.

Overview of the Student Specific Findings of Noncompliance

The chart below identifies the area of compliance based on student files that were reviewed by the compliance & improvement monitoring team during the onsite visit. The chart is broken down into the **compliance citations** and **area of compliance**. The compliance citations are based on the *CFR* found in the federal regulations of IDEA and the *Ed* found in *The New Hampshire Standards for the Education of Children with Disabilities*. The chart aligns the regulatory components to the numbered questions in the self-assessment. Regulatory components and self-assessment numbers are bolded in instances where noncompliance was noted by the compliance & improvement monitoring team.

The **review status** identifies the **number of files reviewed** for the self-assessment question as well as the number of files that were found to be in compliance. For example “5 out of 6 files demonstrated evidence that a copy of the procedural safeguards, available to the parents of a child with a disability, was given to the parent one time in the school year.” This means that 6 files were reviewed and 5 files were found to be in compliance.

In cases where there was a finding of noncompliance for a particular student, the chart identifies the **First Stage Corrective Action of Individual Instance(s) of Noncompliance**. In the case of an individual instance of noncompliance, the corrective action would generally involve the IEP team convening to resolve the finding of noncompliance. Timelines for these corrective actions are also noted. For the First Stage Corrective Actions, the Bureau will return to the private provider program within 3 months following the program receiving written notification of noncompliance (the report) to review all student files in which there were findings of noncompliance in order to verify compliance with the corrective action stated in the report.

In cases where there was a finding of noncompliance for a particular student, the next section of the chart identifies the **First Stage Corrective Action Regarding the Implementation of the Regulation**. This section informs the private provider program of

any practices or procedures which need to be corrected as well as trainings for personnel to inform them of the corrections as a result of the findings of noncompliance. The required corrective action for the program and a timeline for the corrective action is also provided.

In cases where there was a finding of noncompliance for a particular student, the final section of the chart identifies the **Second Stage Corrective Action Regarding the Implementation of the Regulation**. Identified in this section will be the number of new student files that will be selected at the program to demonstrate correct implementation of the regulations for the section of the self-assessment in which noncompliance was found. For the Second Stage Corrective Actions, the Bureau will verify compliance through a subsequent on-site review of the new files within one year from the date of the report. **The total number of student files selected for the Second Stage Corrective Action Regarding the Implementation of the Regulation will not exceed the original number of files reviewed at the private provider program.**

Findings of Noncompliance

When determining compliance, the NHDOE reviews the currently agreed upon/signed IEP at the on-site monitoring visit. During the on-site monitoring visit there were **no files** which could not be reviewed for sections B(#2), D(#11-17), E(#18-23), F(#24), G (#25-27), H(#28), I(#30), J(#31-32), K(#33-42), L(#43), and M(#44-46) as there was no parent and/or LEA signature indicating consent / approval of the provisions of the IEP.

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
Ed 1114.05		A. Record of Access; Confidentiality Requirements
Self-Assessment Question Number & Regulatory Component		Review Status
1.	34 CFR 300.614 Ed 1119.01(a)	2 out of 2 IEP files demonstrated evidence of a record of parties that have obtained access to the education records collected, maintained or used under Part B of the Act, including the name of the party, the date access was given, and the purpose for which the party is authorized to use the records.

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
34 CFR 300.323 Ed 1109		B. Individualized Education Program
Self-Assessment Question Number & Regulatory Component		Review Status
2.	Ed 1109.04(a)	2 out of 2 IEP files demonstrated evidence that a copy of the IEP has been provided to each teacher and service provider listed as having responsibilities for implementing the IEP.
3.	34 CFR 300.324(b)(1)(i) Ed 1109.03(d)	2 out of 2 IEP files demonstrated evidence that the IEP was reviewed at least annually. <i>(No student files were of students with initial IEPs or moved from another state or district.)</i>

4.	34 CFR 300.323(a) Ed 1109.03(d)	1 out of 1 IEP files demonstrated evidence that the IEP was in place at the beginning of the school year. <i>(1 student file was placed after beginning of school year)</i>
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COMPLIANCE CITATIONS		AREA OF COMPLIANCE
34 CFR 300.321 Ed 1103.01		C. IEP Team; Participants in the Special Education Process
Self-Assessment Question Number & Regulatory Component		Review Status
5.	34 CFR 300.321(a)(1) Ed 1103.01(a)	1 out of 2 IEP files demonstrated evidence that one or both of the parents are present at the IEP team meeting or are afforded the opportunity to participate For student code A there was insufficient evidence demonstrating compliance with this requirement.
6.	34 CFR 300.321(a)(2) Ed 1103.01(a)	2 out of 2 IEP files demonstrated evidence that not less than one regular education teacher of the child (if the child is, or may be, participating in the regular education environment) participated in the meeting. <i>(No student files had regular education teacher(s) excused per 34 CFR 300.321(e).) (No student files were of students that are not and will not participate in the regular education environment.)</i>
7.	34 CFR 300.321(a)(3) Ed 1103.01(a)	2 out of 2 IEP files demonstrated evidence that not less than one special education teacher or, where appropriate, not less than one special education provider of the child participated in the meeting. <i>(No student files had special education teacher(s) or special education provider(s) excused per 34 CFR 300.321(e).)</i>
8.	34 CFR 300.321(a)(4) Ed 1103.01(a)	2 out of 2 IEP files demonstrated evidence that the IEP Team included an LEA representative.
9.	Ed 1103.01(d)	2 out of 2 IEP files demonstrated evidence that, if vocational, career or technical education components are being considered, the IEP team membership included an individual knowledgeable about the vocational education programs and/or career technical education being considered. <i>(No student files were students for whom vocational education/CTE were not considered.)</i>
10.	Ed 1103.02(a),(c), (d)	0 out of 0 IEP files demonstrated evidence that the parent(s) received a written invitation no fewer than 10 days before an IEP meeting which included the purpose, time, location and identification of the participants or the parent agreed in writing that the LEA could satisfy this requirement via transmittal by electronic mail <u>or</u> demonstrated evidence of written consent of the parent(s) that the notice requirement were waived [Ed 1103.02(b)]. <i>(No student files were students for whom the written invitation is the responsibility of the LEA.)</i>
<p>First Stage Corrective Action Regarding the Implementation of the Regulations: Provide trainings to appropriate staff for ensuring that one or both of the parents are present at the IEP team meeting or are afforded the opportunity to participate.</p> <p>Provide the dates, names of attendees, and a description of the trainings, which defines the private provider's procedure for complying with this specific rule, to the NHDOE within 3 months from the date of this report.</p> <p>Second Stage Corrective Action Regarding the Implementation of the Regulations: The NHDOE will review 2 new student files at Sununu Youth Services Center School Year program for updated data demonstrating compliance with this requirement.</p>		

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
34 CFR 300.320		D. Individualized Education Program (Present Levels of Academic Achievement and Functional Performance)
Self-Assessment Question Number & Regulatory Component		Review Status
11.	34 CFR 300.324(a)(1)(i)	2 out of 2 IEP files demonstrated evidence that the team considered the strengths of the child.
12.	34 CFR 300.324(a)(1)(iv)	2 out of 2 IEP files demonstrated evidence that the team considered the academic, developmental, and functional needs of the child.
13.	34 CFR 300.324(a)(1)(ii)	1 out of 2 IEP files demonstrated evidence that the concerns of the parents for enhancing the education of their child were considered. For student code B there was insufficient evidence demonstrating compliance with this requirement.
14.	34 CFR 300.324(a)(1)(iii)	2 out of 2 IEP files demonstrated evidence that the results of the initial or most recent evaluation of the child were considered.
15.	34 CFR 300.320(a)(1)(i)	2 out of 2 IEP files demonstrated evidence of a statement in the IEP that describes how the student's disability affects the student's involvement and progress in the general education curriculum. <i>(No student files were preschool age students.)</i>
16.	34 CFR 300.320(a)(4)(ii)	2 out of 2 IEP files demonstrated evidence of a statement in the IEP that describes how the student's disability affects non-academic areas.
17.	34 CFR 300.320(a)(1)(ii)	For preschool children, 0 out of 0 IEP files demonstrated evidence of a statement in the IEP that describes how the disability affects the child's participation in appropriate activities. <i>(2 student files were not of preschool age students.)</i>
<p>First Stage Corrective Action of Student Specific Instance(s) of Noncompliance: As soon as possible, but no later than 2 months from the date of this report, Sununu Youth Services Center, in conjunction with the District must convene the IEP team to review the IEPs and provide evidence that the concerns of the parents for enhancing the education of their child were considered.</p> <p>The NHDOE will verify this through a subsequent on-site review.</p>		
<p>First Stage Corrective Action Regarding the Implementation of the Regulations: Provide training to appropriate staff to include in student's IEPs a statement of the parent's concern's for improving the student's education in the IEP.</p> <p>Provide the dates, names of attendees, and a description of the trainings, which defines the private provider's procedure for complying with this specific rule, to the NHDOE within 3 months from the date of this report.</p>		
<p>Second Stage Corrective Action Regarding the Implementation of the Regulations: The NHDOE will review 2 new student files at Sununu Youth Services Center School Year program for updated data demonstrating compliance with this requirement.</p>		

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
34 CFR 300.324(a)(2)(i) Ed 1109.03(h)		E. Consideration of Special Factors
Self-Assessment Question Number & Regulatory Component		Review Status
18.	34 CFR 300.324(a)(2)(i) Ed 1109.03(h)	When a child's behavior impedes the child's learning or that of others, 2 out of 2 IEP files demonstrated evidence that the team considered the use of positive behavioral interventions and supports, and other strategies, to address that behavior. <i>(No student files were not of students whose behavior impedes learning.)</i>
19.	34 CFR 300.324(a)(2)(ii) Ed 1109.03(h)	When a child demonstrates limited English proficiency, 0 out of 0 IEP files demonstrated evidence that the team considered the language needs of the child as those needs relate to the child's IEP. <i>(2 student files were not of students who demonstrated limited English proficiency.)</i>
20.	34 CFR 300.324(a)(2)(iii) Ed 1109.03(h)	When a child is blind or visually impaired, 0 out of 0 IEP files demonstrated evidence that the team provided for instruction in Braille and the use of Braille unless the IEP team determined, after an evaluation of the child's reading and writing skills, needs, and appropriate reading and writing media (including an evaluation of the child's future needs for instruction in Braille or the use of Braille), that instruction in Braille or the use of Braille was not appropriate for the child. <i>(No child was blind or visually impaired of the files reviewed.)</i>
21.	34 CFR 300.324(a)(2)(iv) Ed 1109.03(h)	2 out of 2 IEP files demonstrated evidence that the IEP Team considered the communication needs of the child.
22.	34 CFR 300.324(a)(2)(iv) Ed 1109.03(h)	When a child is deaf or hard of hearing, 0 out of 0 IEP files demonstrated evidence that the team considered the child's language and communication needs, opportunities for direct communications with peers and professional personnel in the child's language and communication mode, academic level, and full range of needs, including opportunities for direct instruction in the child's language and communication mode. <i>(No child was deaf or hard of hearing of the files reviewed.)</i>
23.	34 CFR 300.324(a)(2)(v) Ed 1109.03(h)	2 out of 2 IEP files demonstrated evidence that the IEP Team considered whether the child needs assistive technology devices and services.

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
Ed 1109.01(a)(10)		F. Courses of Study
Self-Assessment Question Number & Regulatory Component		Review Status
24.	Ed 1109.01(a)(10)	For each student with a disability beginning at age 14 or younger, if determined appropriate by the IEP team, 1 out of 2 IEP files demonstrated evidence of a statement of the transition service needs of the student under the applicable components of the student's IEP that focuses on the student's courses of study such as participation in advanced-placement courses or a vocational education. <i>(1 student file was students aged 13 or younger who will not be turning 14 during the IEP period and no evidence the IEP team determined this is necessary.)</i> For student code B there was insufficient evidence demonstrating compliance with this requirement.

First Stage Corrective Action of Student Specific Instance(s) of Noncompliance: As soon as possible, but no later than 2 months from the date of this report, Sununu Youth Services Center, in conjunction with the sending District must convene the IEP teams to review the IEPs and provide evidence that for each student with a disability beginning at age 14 or younger, if determined appropriate by the IEP team, the IEP includes a statement of the transition service needs of the student under the applicable components of the student's IEP that focuses on the student's courses of study such as participation in advanced-placement courses or a vocational education.

The NHDOE will verify this through a subsequent on-site review.

First Stage Corrective Action Regarding the Implementation of the Regulations: Provide training to appropriate staff to ensure that for each student with a disability beginning at age 14 or younger, if determined appropriate by the IEP team, the IEP includes a statement of the transition service needs of the student under the applicable components of the student's IEP that focuses on the student's courses of study such as participation in advanced-placement courses or a vocational education.

Provide the dates, names of attendees, and a description of the trainings, which defines the private provider's procedure for complying with this specific rule, to the NHDOE within 3 months from the date of this report.

Second Stage Corrective Action Regarding the Implementation of the Regulations: The NHDOE will review 2 new student files at Sununu Youth Services Center School Year program for updated data demonstrating compliance with this requirement.

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
34 CFR 300.320(a)(2)(i) Ed 1109.01(a)		G. Measurable Annual Goals; Short-term Objectives or Benchmarks
Self-Assessment Question Number & Regulatory Component		Review Status
25.	34 CFR 300.320(a)(2)(i) Ed 1109.01(a)(1)	0 out of 2 IEP files demonstrated evidence of a statement of measurable annual goals, including academic and functional goals. For student code(s) A & B there was insufficient evidence demonstrating compliance with this requirement.
26.	34 CFR 300.320(a)(2)(i)(A) Ed 1109.01(a)(1)	1 out of 2 IEP files demonstrated evidence that the measurable annual goals meet the child's needs that result from the child's disability to enable the child to be involved in and make progress in the general education curriculum as well as the child's other educational needs that results from the child's disability. For student code B there was insufficient evidence demonstrating compliance with this requirement.
27.	Ed 1109.01(a)(6)	2 out of 2 IEP files demonstrated evidence of short-term objectives or benchmarks for all children unless the parent determines them unnecessary for all or some of the child's annual goals.

First Stage Corrective Action of Student Specific Instance(s) of Noncompliance: As soon as possible, but no later than 2 months of the date of this report, Sununu Youth Services Center, in conjunction with the sending District must amend the IEPs to include measurable annual goals; and measurable goals that meet the child's needs that result from the child's disability and / or other educational needs.

The NHDOE will verify this through a subsequent on-site review.

First Stage Corrective Action Regarding the Implementation of the Regulations: Provide training to appropriate staff to address writing measurable annual goals; and including goals that meet the child’s needs that result from the child’s disability and other educational needs.

Provide the dates, names of attendees, and a description of the trainings, which defines the private provider’s procedure for complying with this specific rule, to the NHDOE within 3 months from the date of this report.

Second Stage Corrective Action Regarding the Implementation of the Regulations: The NHDOE will review 2 new student files at Sununu Youth Services Center School Year program for updated data demonstrating compliance with this requirement.

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
Ed 1109.01(a)(8)		H. Review and Revision of IEPs (Measuring Progress)
Self-Assessment Question Number & Regulatory Component		Review Status
28.	Ed 1109.01(a)(8)	<p>1 out of 2 IEP files demonstrated evidence that the IEP includes a statement of how the child’s progress toward meeting the annual goals shall be provided to the parents.</p> <p>For student code A there was insufficient evidence demonstrating compliance with this requirement.</p>
<p>First Stage Corrective Action of Student Specific Instance(s) of Noncompliance: As soon as possible, but no later than 2 months of the date of this report, Sununu Youth Services Center, in conjunction with the sending District must amend the IEPs to include a statement of how the child’s progress toward meeting the annual goals shall be provided to the parents.</p> <p>The NHDOE will verify this through a subsequent on-site review.</p>		
<p>First Stage Corrective Action Regarding the Implementation of the Regulations: Provide training to appropriate staff to address that IEP’s include a statement of how the child’s progress toward meeting the annual goals shall be provided to the parents.</p> <p>Provide the dates, names of attendees, and a description of the trainings, which defines the private provider’s procedure for complying with this specific rule, to the NHDOE within 3 months from the date of this report.</p>		
<p>Second Stage Corrective Action Regarding the Implementation of the Regulations: The NHDOE will review 2 new student files at Sununu Youth Services Center School Year program for updated data demonstrating compliance with this requirement.</p>		

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
Ed 1114.06(b)		I. Responsibilities of Private Providers of Special Education or other Non-LEA Programs in the Implementation of IEPs
Self-Assessment Question Number & Regulatory Component		Review Status
29.	34 CFR 300.325(b) Ed 1109.05 Ed 1114.06(a);	<p>For the purpose of initiating the process for all matters concerning possible changes and/or modification in the identification, evaluation, development and/or revision of an IEP or changes in placement of a child with a disability, 0 out of 0 IEP files demonstrated evidence that the private provider contacted the sending school district. <i>(2 student files had no changes in the child’s identification, evaluation, development or revision of the IEP or placement)</i></p>

30.	Ed 1114.06(i), (j), (k)	<p>0 out of 2 IEP files demonstrated evidence that a minimum of 3 comprehensive reports per year are completed on each child with a disability enrolled in the program.</p> <p>For student code(s) A & B there was insufficient evidence demonstrating compliance with this requirement.</p>
<p>First Stage Corrective Action Regarding the Implementation of the Regulations: Provide training to appropriate staff to ensure that a minimum of 3 comprehensive reports per year are completed on each child with a disability enrolled in the program.</p> <p>Provide the dates, names of attendees, and a description of the trainings, which defines the private provider's procedure for complying with this specific rule, to the NHDOE within 3 months from the date of this report.</p>		
<p>Second Stage Corrective Action Regarding the Implementation of the Regulations: The NHDOE will review 2 new student files at Sununu Youth Services Center School Year program for updated data demonstrating compliance with this requirement.</p>		

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
34 CFR 300.323(d)(2)(ii) Ed 1109.03(a); Ed 1109.03(v); Ed 1102.01(b)		J. Accessibility of Child's IEP to Teachers and Others (General Accommodations and General Modifications)
Self-Assessment Question Number & Regulatory Component		Review Status
31.	Ed 1102.01(b)	If accommodations are included, 2 out of 2 IEP files demonstrated evidence that the accommodations are changes in instruction or evaluation determined necessary by the IEP team that do not impact the rigor, validity, or both of the subject matter being taught or assessed. <i>(No student files were students with no accommodations.)</i>
32.	Ed 1102.03(v)	If modifications are included, 0 out of 0 IEP files demonstrated evidence that the modifications are changes in instruction or evaluation determined necessary by the IEP team that impact the rigor, validity, or both of the subject matter being taught or assessed. <i>(2 student files were students with no modifications.)</i>

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
34 CFR 300.320(a) Ed 1109.01(a)(1); 1109.04(b)		K. Definition of Individualized Education Program (Special Education and Related Services, Supplementary Aids and Services, and Program Modifications or Supports for School Personnel)
Self-Assessment Question Number & Regulatory Component		Review Status
33.	34 CFR 300.320(a)(4) Ed 1109.01(a)(1)	<p>0 out of 2 IEP files demonstrated evidence of a statement of special education.</p> <p>For student code(s) A & B there was insufficient evidence demonstrating compliance with this requirement.</p>

34.	Ed 1109.04(b)(1)	<p>1 out of 2 IEP files demonstrated written evidence documenting implementation of the IEP with regards to all special education services provided.</p> <p>For student code A there was insufficient evidence demonstrating compliance with this requirement.</p>
35.	34 CFR 300.320(a)(4) Ed 1109.01(a)(1)	2 out of 2 IEP files demonstrated evidence of a statement of related services. <i>(No student files were students for whom there was no evidence that the IEP team determined this is necessary.)</i>
36.	Ed 1109.04(b)(1)	2 out of 2 IEP files demonstrated written evidence documenting implementation of the IEP with regards to all related services provided. <i>(No student files were students for whom there were no related services in the IEP.)</i>
37.	34 CFR 300.320(a)(4) Ed 1109.01(a)(1)	0 out of 0 IEP files demonstrated evidence of a statement of supplementary aids and services. <i>(2 student files were students for whom there was no evidence that the IEP team determined this is necessary.)</i>
38.	Ed 1109.04(b)(2)	0 out of 0 IEP files demonstrated written evidence documenting implementation of the IEP with regards to any supplementary aids and services provided. <i>(2 student files were students for whom there were no supplementary aids and services in the IEP.)</i>
39.	34 CFR 300.320(a)(4) Ed 1109.01(a)(1)	0 out of 0 IEP files demonstrated evidence of a statement of the supports for school personnel. <i>(2 student files were students for whom there was no evidence that the IEP team determined this is necessary.)</i>
40.	Ed 1109.04(b)(4)	0 out of 0 IEP files demonstrated written evidence documenting implementation of the IEP with regards to supports for school personnel. <i>(2 student files were students for whom there were no supports for personnel in the IEP.)</i>
41.	34 CFR 300.320(a)(7) Ed 1109.01(a)(1)	2 out of 2 IEP files demonstrated evidence of a projected date for the beginning of the services and modifications described in the supports and services section of the IEP.
42.	34 CFR 300.320(a)(7) Ed 1109.01(a)(1)	2 out of 2 IEP files demonstrated evidence of the anticipated frequency, location, and duration of those services and modifications described in the supports and services section of the IEP.
<p>First Stage Corrective Action of Student Specific Instance(s) of Noncompliance: As soon as possible, but no later than 2 months from the date of this report, Sununu Youth Services Center in conjunction with the sending District must convene the IEP teams to review the IEPs and provide evidence of a statement of special education.</p> <p>As soon as possible, but no later than 2 months from the date of this report, Sununu Youth Services Center will provide documentation for evidence of the implementation of special education services provided.</p> <p>The NHDOE will verify this through a subsequent on-site review.</p>		
<p>First Stage Corrective Action Regarding the Implementation of the Regulations: Provide training to appropriate staff to ensure that the IEP includes applicable special education services as well as written evidence documenting the implementation of the IEP with regards to all special education services provided.</p> <p>Provide the dates, names of attendees, and a description of the trainings, which defines the private provider's procedure for complying with this specific rule, to the NHDOE within 3 months from the date of this report.</p>		
<p>Second Stage Corrective Action Regarding the Implementation of the Regulations: The NHDOE will review 2 new student files at Sununu Youth Services Center School Year program for updated data demonstrating compliance with this requirement.</p>		

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
34 CFR 300.320(a)(5) Ed 1109.01(a)(1)		L. Definition of Individualized Education Program (Justification for Non-Participation)
Self-Assessment Question Number & Regulatory Component		Review Status
43.	34CFR 300.320(a)(5) Ed 1109.01(a)(1)	2 out of 2 IEP files demonstrated evidence of an explanation of the extent, if any, to which the child will not participate with nondisabled children in the regular class and in the activities described in the supports and services section of the IEP.

COMPLIANCE CITATIONS		AREA OF COMPLIANCE
34 CFR 300.320(a)(6) Ed 1109.01(a)(1)		M. Definition of Individualized Education Program (State and District Wide Assessments)
Self-Assessment Question Number & Regulatory Component		Review Status
44.	34 CFR 300.320(a)(6)(i) Ed 1109.01(a)(1) RSA 193-C Ed 1114.05(k)	2 out of 2 IEP files demonstrated evidence of a statement of any individual appropriate accommodations that are necessary to measure the academic achievement and functional performance of the child on State and district wide assessments. <i>(No student files were of students for whom there were no state or district wide assessments for the student's age/grade level.)</i>
45.	34 CFR 300.320(a)(6)(ii)(A) Ed 1109.01(a)(1) RSA 193-C Ed 1114.05(k)	When the IEP Team determines that the child must take an alternate assessment instead of a particular regular State or district wide assessment of student achievement, 0 out of 0 IEP files demonstrated evidence of a statement of why the child cannot participate in the regular assessment. <i>(2 student files were of students not taking an alternate assessment.)</i>
46.	34 CFR 300.320(a)(6)(ii)(B) Ed 1109.01(a)(1) RSA 193-C Ed 1114.05(k)	When the child is taking an alternate assessment, 0 out of 0 IEP files demonstrated evidence describing why the particular alternate assessment selected is appropriate for the child. <i>(2 student files were of students not taking an alternate assessment.)</i>