

**New Hampshire
Department of Education**

**Bureau of Special Education Support
Monitoring Review for Approval of
Private Provider Special Education
Programs**

**NFI North
Contoocook School Program**

**Summary Report
2023 - 2024**

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Monitoring Visit Conducted on **March 15, 2024**
Report Date: May 8, 2024

Overview of the Contoocook School Program

NFI North's Contoocook School Program is a New Hampshire Department of Education (NHED), Bureau of Special Education Support (Bureau) Approved Private Provider of Special Education Program. Located at 40 Park Lane in Contoocook, NH, the Contoocook School Program provides an innovative special education program for youth requiring behavioral health services.

Operating a 180 day school year program for up to 14 students of all genders in grades 6 – 12, this day program provides a full curriculum, following the New Hampshire Minimum Standards, and offers a regular high school diploma. Students enrolled in this program have primary educational disabilities of Autism, Emotional Disturbance, Other Health Impairment, and Specific Learning Disability. The Contoocook School Program is eligible to provide summer ESY services to students with the primary educational disabilities and grade ranges for which they have program approval.

Learning experiences at the Contoocook School Program are designed to promote social, behavioral, and academic development. The supportive, trauma-informed teaching environments naturally supports student participation and builds a strong sense of community. The Contoocook School Program fosters a positive peer culture where students work to develop skills necessary to make successful transitions to employment, in their families, and when possible, back to their school district. Classroom environments are small and comfortable, allowing students to concentrate on their studies with minimal distractions.

Staff at the Contoocook School Program addresses all areas of a student's growth simultaneously to promote long-term change. They believe students want to learn and that enhanced academic performance can be obtained when issues outside the academic realm are addressed. They also believe that experience enhances concept development and skills can be best grasped when experiences provide content.

To best support the social, emotional, and behavioral needs of their students, the Contoocook School Program has adopted Trust-Based Relational Intervention (TBRI), an attachment-based, trauma-informed, whole-child approach to meeting the needs of children and youth who have experienced adversity, toxic stress, and/or trauma. This model focuses on three main principles, empowerment, connection, and correction.

The Contoocook School Program has partnered with Youth MOVE New Hampshire (YMNH). This program is a peer-led, student-driven enrichment group with the mission of "promoting youth empowerment, leadership, and advocacy". One afternoon each week, students engage with YMNH Youth Peer Specialists who cultivate and facilitate "pro-social opportunities for mutual learning and further development of personal leadership and advocacy skills".

The Contoocook School Program utilizes the RENEW program (Resilience, Empowerment, and Natural Support for Education and Work), organized through the UNH Institute on

Disability. and supports students as they navigate from school to adulthood by helping them design and pursue a plan. RENEW is a structured school-to-career transition planning and individualized wraparound process for youth with emotional and behavioral challenges. It focuses on supporting each student to design and pursue a plan for transitioning from school to adult life. This program is designed to increase high school completion, employment, and post-secondary education participation rates among vulnerable youth.

The leadership team at Contoocook School Program includes a regional director, program director, special education administrator/assistant program director, special education teacher, clinical coordinator, and paraprofessionals.

Program Strengths and Notable Achievements and Recommended Preventive Actions

Program Strengths and Notable Achievements

During the monitoring visit, it had been revealed that the **Contoocook School Program** included several practices in their teaching, lessons, and expectations which are noteworthy. Such practices include:

- Displaying student created educational materials on bulletin boards throughout the school.
- A monthly newsletter sent to students and families that shares upcoming events, programming initiatives, helpful tips/tools/information regarding health and behavior and showcases students' accomplishments.
- Working in conjunction with the sending school districts to keep students connected to their communities.
- Commitment to working with students on transition planning for life after high school.
- Implementing programs to support social, emotional, and behavioral learning.
- Incorporating differentiated instruction, established within the curriculum and through daily lesson planning.
- Teaching specially designed instruction to master IEP goals within the classroom setting enhancing overall learning.
- Mutual respect between all staff and students where staff and students share a trusting relationship.

- Comfortable and supportive classroom atmosphere that fosters a multi-sensory approach to teaching, including multiple modes of communicating knowledge of learned material.

Recommended Preventative Actions

During the monitoring visit, the NHED did not identify any recommended preventative actions at the **Contoocook School Program**.

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

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).

The Monitoring Review Process for Approval of Private Provider Special Education Programs 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.

The NHED Bureau of Special Education Support's Approval of Private Provider Special Education Programs Monitoring Process (AP3s) consists of a review of required application materials and an on-site component with program visit(s) and random sampling. The AP3s process occurs during the last year of approval of the Private Special Education Program (Private Provider).

The spring prior to the AP3s process, the Bureau notified **NFI North's Contoocook School Program** of the upcoming monitoring and scheduled a time to meet with the administrative team to review the process and answer any questions. The Bureau sent written communication in the fall of the monitoring year which included an overview of the monitoring process and tentative dates for the on-site Data Collection Form training and on-site monitoring visit.

As part of the AP3s process the **Contoocook School Program** submitted required application materials for review and the Bureau confirmed their nonpublic school approval.

The Bureau visited the **Contoocook School Program** on March 15, 2024 to conduct the AP3s on-site monitoring visit. Prior to conducting this visit, the Bureau provided training to

Contoocook School Program staff on how to complete the On-site Data Collection Form for the random sampling and what would be acceptable evidence.

Based on the on-site monitoring components for the AP3s Process there is one main component to corrective actions titled, *“Corrective Action Regarding the Implementation of the Regulations”*, which typically involves the Private Provider participating in or providing professional development training to appropriate personnel for areas found in noncompliance. For any corrective action regarding the implementation of the regulations, evidence of provided trainings is required and must be submitted to the Bureau. It is recommended that all corrective actions be verified by the Bureau within three months from the date of this report but cannot go unaddressed longer than one year of the date of the on-site monitoring visit. Any required Corrective Action completed and verified compliant prior to the report meeting will be noted as verified compliant in the written report. The final close-out letter will not be issued until all corrective actions have been verified corrected.

The New Hampshire Department of Education, Bureau of Special Education Support review members for **NFI North’s Contoocook School Program** on-site monitoring review included Heidi Clyborne and Alexandra Ferraro.

Special Education 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*.

During their 2019-2020 AP3s process, **Contoocook School Program’s** Special Education Procedures were verified compliant 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.

Private Providers monitored for program approval prior to the last rule change (Ed 1119.01 Confidentiality Requirements) needed to submit, for review, only the sections of their Special Education Procedures pertaining to the revised rule. Since there have been no changes in the rules affecting the Special Education Procedures since **Contoocook School Program’s** 2019-2020 AP3s process, submission was not required.

Based on the review of the **Contoocook School Program’s** Special Education Procedures the monitoring team determined there were **0 findings of noncompliance**.

Private Provider Curriculum and Effective Implementation

Contoocook School Program's curriculum for grades 6-12 was verified compliant during their previous monitoring review process in the learning areas of 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 306.26(b)(1) and (2) & Ed 306.27(c).

Since **NFI North's Contoocook School Program's** last AP3s process, there has been one change to the New Hampshire Minimum Standards, Ed 306.49 Holocaust and Genocide Education Program, which was widely shared with all of New Hampshire's Private Providers of Special Education Programs in 2022. With the understanding that the State is currently reviewing and making recommendations for some revisions to the Administration of Minimum Standards (Ed 306), the Bureau has determined that reviewing curriculum for the addition of Ed 306.49 is not warranted at this time.

Contoocook School Program grants a high school diploma.

Based on the previous review of the **Contoocook School Program's** curriculum, the monitoring team determined there were **0 findings of noncompliance**.

Personnel

The Bureau has reviewed **Contoocook School Program's** personnel certifications using the New Hampshire Educator Information System. The review process was for educators employed during 2023 – 2024 school year.

The personnel roster provided by **Contoocook School Program** 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 **Contoocook School Program's** personnel certifications, the monitoring team determined there was **1 finding of noncompliance**.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
34 CFR 300.18; 34 CFR 300.156; Ed 1114.10(a)	Personnel Standards
Findings of Noncompliance: NFI North’s Contoocook School Program does not have a full-time, certified special education administrator or principal resulting in 1 finding of noncompliance .	
Corrective Action regarding the Implementation of the Regulations: The NFI North Contoocook School Program must hire a special education administrator or principal who holds appropriate credentials.	
Provide the Bureau with evidence that resolves the discrepancies between subject/assignments and endorsements as well as a description of the method used to inform staff to NHED as soon as possible but no later than 6 months from the date of this report.	

Contoocook School Program was notified of the concerns listed above, via email, on February 21, 2024. Staff specific information was included in the email.

General Program 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).

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 at least 30 days prior to the onsite monitoring visit in the year monitored.

Based on the review of the **Contoocook School Program’s** application materials, the monitoring team determined there were **0 findings of noncompliance**.

Program Monitoring and Random Sampling

Per RSA 186-C:5 the Monitoring Process must include on-site monitoring to include program monitoring and random sampling. The AP3s Process for **Contoocook School Program** included an on-site monitoring visit during which the Bureau monitoring team was provided with a program overview, visited all approved locations for the approved program and collected random sampling data using the On-site Data Collection Form. Random sampling data consisted of comprehensive reports per Ed 1114.06(i), Ed 1114.06 (j), Ed 1114.06 (k) and service implementation per Ed 1114.03(a).

At least 30 days prior to the scheduled monitoring on-site visit **Contoocook School Program** submitted to the Bureau a completed On-site Data Collection Form that included a coded list of twenty percent of the New Hampshire students enrolled in the program the year prior to monitoring for verification of comprehensive reports and a coded list of the services

Contoocook School Program was responsible for providing to all of their NH students enrolled in the program during the three-week period of October 23, 2023 - November 10, 2023 for verification of service implementation. The **Contoocook School Program** was notified by the Bureau of the three-week time period on December 14, 2023.

At the on-site monitoring visit the Bureau monitoring team used the On-site Data Collection Form to verify evidence that the **Contoocook School Program** completed a minimum of three comprehensive reports for each student listed on the form per Ed 1114.06(i), Ed 1114.06 (j), Ed 1114.06 (k) and that required services were provided during the designated time period per Ed 1114.03(a).

Based on the review of the **Contoocook School Program** monitoring and random sampling, the monitoring team determined there was **1 finding of noncompliance**.

Required Corrective Action was completed and verified compliant by the Bureau prior to the written report.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
Comprehensive Report Regulatory Component	Review Status
Ed 1114.06(i) Ed 1114.06(j) Ed 1114.06(k)	Each private provider of special education or other non-LEA program shall complete a minimum of 3 comprehensive reports per year on each child with a disability enrolled in the program. The reports shall describe the child’s progress toward meeting the IEP goals, include a record of attendance, be written in terminology understandable to the parent, and be provided to the sending LEA and the parent of the child. Reports shall be provided to parents in the native language or other mode of communication used by the parent.
100% of student codes reviewed at the Contoocook School Program demonstrated evidence that a minimum of 3 comprehensive reports per year are completed on each child with a disability enrolled in the program meeting all compliance criteria. This results in 0 findings of noncompliance since comprehensive reports reviewed were in 100% compliance.	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
Service Implementation Regulatory Component	Review Status
Ed 1114.03(a)	A private provider of special education or other non-LEA program shall be responsible for providing students with disabilities all services detailed in their IEPs unless the provision of those services has been agreed upon by contract with the sending LEA.
91% of services, that were the responsibility of the Contoocook School Program had evidence demonstrating provision. This results in 1 finding of noncompliance since service provision was not in 100% compliance.	

Corrective Action Regarding the Implementation of the Regulations: Provide training to appropriate staff to ensure that the private provider implements special education and related services as outlined in the IEP.

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 Bureau within 3 months from the date of this report.

Corrections Verified Compliant prior to written report.

Determining Program Approval Periods

To determine the length of program approval the Approval of Private Provider Programs is broken down into 7 sections. Points are accumulated based on the number of findings in each section and weighted towards those areas most directly impacting the provision of FAPE.

- Application Materials, not covered in other sections, (0-5 points)
- Curriculum (0-22 points)
- Personnel Certified (0-9 points)
- Required Staff (0-9 points)
- Special Education Procedures (0-5 points)
- Service Provision (0-40 points)
- Comprehensive Reports (0-10 points)

A program is given a percent score based on the total number of points received out of the maximum possible. The higher a percentage a program receives the shorter their approval period.

- 5 years: 0-20%
- 4 years: 21-40%
- 3 years: 41-60%
- 2 years: 61-80%
- 1 year: 81-100%

Based on the findings outlined in this report **NFI North's Contoocook School Program** received a score of **7%** and a **5 year program approval**.