

**New Hampshire
Department of Education
Bureau of Special Education Support**

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

Strafford Learning Center:

**Charles Ott Academy
John Powers School
Rochester Learning Academy**

**Summary Report
2023 - 2024**

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**Monitoring Visit Conducted on March 12, 2024
Report Date: May 22, 2024**

Overview of the Strafford Learning Center Programs

Strafford Learning Center has four New Hampshire Department of Education, Bureau of Special Education Support Approved Programs, Charles Ott Academy, John Powers School, Rochester Learning Academy, and John Powers Primary School. John Powers Primary School is a newly approved special education program and was not part of this program approval monitoring process. This report will only focus on Strafford Learning Center's previously approved programs, Charles Ott Academy, John Powers School, and Rochester Learning Academy.

With a mission to be "leaders in educational equity", Strafford Learning Center is dedicated to being responsive to the needs of area school districts. Understanding that student behaviors are primarily the reason for why students are placed at one of Strafford Learning Centers approved special education programs, and that student aggression may be the result of past trauma, Strafford Learning Center strives to create trauma sensitive environments and utilizes a Trauma Informed Care approach. Staff at all three approved programs are trained in Therapeutic Crisis Intervention. Strafford Learning Center's approved special education programs also engage in Positive Behavior Interventions and Supports (PBIS) and a Multi-Tiered System of Supports (MTSS). These educational frameworks of support help staff use data to make well-informed decisions about programming that will result in the best outcomes for each of their students. Strafford Learning Center's leadership team consists of an executive director and assistant director, overseeing all programs, and program directors for each of the approved special education programs.

The **Charles Ott Academy** program (COA) is in a historic mill district located at 36 Canal Street in Somersworth, NH. It operates a 180 day school year schedule and has approval to serve 16 students, (both in state and out of state), of all genders in grades 9-12 with a primary educational disability of Emotional Disturbance, Other Health Impairments, Specific Learning Disabilities, or Speech-Language Impairment. COA believes, "every student can achieve success". Its small class sizes (1:4 staff to student ratio) supports COA's ability to provide personalized programming that meets the unique needs of each of their students.

COA operates two-three hour sessions each day with no more than 8 students in each session. Half of the day students receive academic instruction at COA and the other half they either attend their sending school district, participate in classes in a local Career and Technical Center, or attend Strafford Learning Center's Transition Support Center.

COA staff maintain a high standard for student academic engagement by providing a dynamic and innovative academic program that relates to real life occurrences and includes hands-on learning opportunities. Educational programming consists of Competency Based Learning, Experiential Learning, and Project Based Learning. With the understanding that academics alone cannot prepare a student for life after high school, COA also provides a high level of counseling support to promote social/emotional learning and integrates life skills instruction into everyday components of the curriculum.

COA is not a diploma granting program. Students receive credit from their sending school district and follow that district's graduation requirements. Upon completion of their sending school district's graduation requirements through COA, students receive a high school diploma from their high school of record.

The **John Powers School** program (JPS), located at 317 Main Street in Somersworth, NH, has the capacity for 28 students, (both in state and out of state), of all genders in grades 3-8 with a primary educational disability of Emotion Disturbance, Other Health Impairment, Specific Learning Disability, and Speech-Language Impairment. JPS operates a 180 day school year schedule and is eligible to provide summer ESY services to students with the primary educational disabilities and grade ranges for which they have program approval.

Staff at JPS work collaboratively to provide a consistent, structured setting with a strong therapeutic component to address the underlying reasons for why each student has struggled in a traditional school environment. Believing that "every child deserves a positive and meaningful educational experience and should have the opportunity to excel and feel pride in their achievements," the JPS staff focuses on the intellectual, social, emotional, and creative abilities of each student. JPS realizes learning can only occur when student needs are met and strives to create a learning environment where students feel safe, have a sense of belonging, and feel useful and successful.

The staff at JPS are deeply committed to students and their families and "help students learn the skills they need to increase success not only within the school setting but also at home with the family and in the public domain". JPS provides a supportive learning environment consisting of a high staff-to-student ratio (1:2) where students receive a rigorous, differentiated, and engaging academic education.

Students participate in hands-on learning, are provided multiple opportunities to make real-life connections to their learning and benefit from certified Orton-Gillingham practitioners. Time is designated each day for students to experience and discuss literature outside of their language arts class during Literature Out Loud. During this time teachers read out loud to their class modeling reading fluency. JPS staff creates opportunities to have fun with their students too, especially with the annual talent show.

The **Rochester Learning Academy** program (RLA), located at 35 E Industrial Way in Rochester, NH, operates a 180 day school year schedule and has the capacity for 28 students (both in state and out of state), of all genders in grades 6-12 with a primary educational disability of Autism, Emotional Disturbance, Other Health Impairment, Specific Learning Disability, Speech-Language Impairment, or Traumatic Brain Injury.

RLA utilizes a variety of learning modalities, including a project based learning model, competency based education model, integrated instructional model, differentiated instruction model, inquiry based learning model, experience based learning, and remote learning to engage and meet the needs of every student. These multiple pathways accommodate different learning styles while applying the same universally high academic expectations. To provide these various learning modalities, RLA has designed a creative

schedule to meet the needs of students. Core academics are taught Monday-Thursday with Fridays reserved for Advisory and Integrated curriculum to include Unified Arts/PE and experience and exposure to focused areas such as outdoor adventure, arts, and museum visits. Daily scheduling includes social emotional learning experiences promoting positive socialization and peer to peer connections and club activities.

RLA's values include community, problem solving, self-advocacy, participation, work ethic, positivity, and honesty. RLA incorporates student directed transition planning to assist in the development of a meaningful and coordinated set of transition activities that motivates students and helps them build the necessary skills to achieve their long term goals for after high school.

Students attending RLA have the opportunity to earn a standard high school diploma from Spaulding High School (26 credits) or from Strafford Learning Center (20 credits). The decision regarding diploma options is individualized and based on the student's credit history and personal goals. Students have multiple pathways of earning high school credits. They can earn credits through courses taken at RLA, Spaulding High School, the Regional Career Technical Centers, VLACS, Rochester Continuing Education, or participate in Extended Learning Opportunities where students work towards mastery of specific competencies outside of the traditional classroom.

Program Strengths and Notable Achievements and Recommended Preventive Actions

Program Strengths and Notable Achievements

During the monitoring visit, it had been revealed that the approved special education programs at **Strafford Learning Center** includes several practices in their teaching, lessons, and expectations which are noteworthy. Such practices include:

- Working in conjunction with the sending School Districts to keep students connected to their communities.
- Closely collaborating with districts to plan for a smooth transition when students are at a point of being able to return to their local school district.
- Consistent messaging and methodology throughout all programs; encompassing positive behavior supports; student engagement, curriculum access and rigor; and transition.
- Having multiple counselors in each program working consistently with students.

- Multiple curriculums for Social Emotional Learning: Choose Love, Zones of Regulation, and Skillstreaming.
- Project based learning with creative scheduling to support the interests and needs of the students.
- Incorporating real-life activities that promote opportunities to support outside interests and build a skill set leading to possible future employment.
- Transition planning which includes Academic Readiness, Work Readiness, Independent Living, Self- Determination, Wellness, and Career Connections.

Recommended Preventative Actions

During the monitoring visit, the NHED did not identify any recommended preventative actions at Strafford Learning Center.

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 **Strafford Learning Center** 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 **Strafford Learning Center** submitted required application materials for review and the Bureau confirmed their nonpublic school approval.

The Bureau visited the program on March 12, 2024 to conduct the AP3s on-site monitoring visit. Prior to conducting this visit, the Bureau provided training to **Strafford Learning Center's** 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 Bureau review members for **Strafford Learning Center's** on-site monitoring review included Heidi Clyborne and Sabrina Congram.

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 2018-2019 AP3s process, **Strafford Learning Center's** Special Education Procedures were verified compliant the 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.

Since then, there has been one rule change, (Ed 1119.01 Confidentiality Requirements), affecting the Special Education Procedures. Private Providers monitored for program approval prior to this change needed to submit, for review, only the sections of their Special Education Procedures pertaining to the revised rule.

Strafford Learning Center made changes to their Special Education Procedures since being monitored last and submitted updated procedures for the Bureau's review.

Based on the review of **Strafford Learning Center's** Special Education Procedures the monitoring team determined there were **0 findings of noncompliance**.

Private Provider Curriculum and Effective Implementation

Strafford Learning Center's K-12 curriculum was verified compliant during the 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 **Strafford Learning Center'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.

Strafford Learning Center's Charles Ott Academy is not a diploma granting program. Students receive credit from their sending school district and follow that district's graduation requirements. Student attending **Rochester Learning Academy** can earn a standard high school diploma from Spaulding High School (26 credits) or from Strafford Learning Center (20 credits).

Based on the previous review of Strafford Learning Center's curriculum, the monitoring team determined there were **0 findings of noncompliance**.

Personnel

The Bureau of Special Education Support has reviewed **Strafford Learning Center'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 **Strafford Learning 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 **Strafford Learning Center's** personnel certifications, the monitoring team determined there were **0 findings of noncompliance**.

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 on-site monitoring visit in the year monitored.

Based on the review of the **Strafford Learning Center'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 **Strafford Learning Center** included an on-site monitoring visit during which the Bureau monitoring team was provided with a program overview and visited all approved locations for the approved program. Collected random sampling data using the On-site Data Collection Form was reviewed prior to the on-site visit since **Strafford Learning Center** submitted required evidence with their application materials. 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 **Strafford Learning Center** submitted to the Bureau completed On-site Data Collection Forms for their three programs. The Data Collection Forms included a coded list of twenty percent of the New Hampshire students enrolled in each program the year prior to monitoring for verification of comprehensive reports and a coded list of the services **Strafford Learning Center** was responsible for providing to all of their NH students enrolled in each program during the

three-week period of October 23, 2023 - November 10, 2023 for verification of service implementation. **Strafford Learning Center** was notified by the Bureau of the three-week time period on December 14, 2023.

Since **Strafford Learning Center** submitted documentation for implementation of services and comprehensive reports with their application materials the Bureau was able to review the evidence and complete the random sampling using their submitted Data Collection Forms prior to the on-site visit.

Based on the review of the **Strafford Learning Center's** program monitoring and random sampling, the monitoring team determined there were **3 findings of noncompliance**:

- **1 finding of noncompliance at the Charles Ott Academy program**
- **1 finding of noncompliance at the John Powers School program**
- **1 finding of noncompliance at the Rochester Learning Academy program**

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

Charles Ott Academy program

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 Charles Ott Academy 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.

<p>96% of services, that were the responsibility of Charles Ott Academy program had evidence demonstrating provision. This results in 1 finding of noncompliance since service provision was not in 100% compliance.</p> <p>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.</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 Bureau within 3 months from the date of this report.</p> <p>Corrections Verified Compliant prior to written report.</p>
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John Powers School program

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.
<p>100% of student codes reviewed at the John Powers 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.</p>	

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.
<p>97% of services, that were the responsibility of John Powers School program had evidence demonstrating provision. This results in 1 finding of noncompliance since service provision was not in 100% compliance.</p> <p>Corrections Verified Compliant prior to written report.</p> <p>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.</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 Bureau within 3 months from the date of this report.</p>	

Rochester Learning Academy program

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.
<p>100% of student codes reviewed at the Rochester Learning Academy 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.</p>	

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.
<p>99% of services, that were the responsibility of Rochester Learning Academy program had evidence demonstrating provision. This results in 1 finding of noncompliance since service provision was not in 100% compliance.</p> <p>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.</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 Bureau within 3 months from the date of this report.</p> <p>Corrections Verified Compliant prior to written report.</p>	

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 **Strafford Learning Center's Charles Ott Academy** program received a score of **5%** and a **5 year program approval**.

Based on the findings outlined in this report **Strafford Learning Center's John Powers School** program received a score of **5%** and a **5 year program approval**.

Based on the findings outlined in this report **Strafford Learning Center's Rochester Learning Academy** program received a score of **5%** and a **5 year program approval**.