

Focused Monitoring Report

❖ Colchester School District ❖

On-site Review: March 14 - March 18, 2011



General Supervision and Monitoring Division

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The Monitoring Team wants to thank everyone in the Colchester School District for being gracious and flexible hosts!

I. Description of Monitoring Authority and Focused Monitoring

The Individuals with Disabilities Education Act (IDEA), (20 U.S.C. 1400 (c)(1)), provides federal funds to assist states in educating children with disabilities and requires each participating state to ensure that school districts and other publicly-funded educational agencies in the state comply with the requirements of IDEA and its implementing regulations. Further, Section 616 of IDEA states that the primary focus of Federal and State monitoring activities shall be on improving education results and functional outcomes for all children with disabilities and ensuring that States meet the program requirements with a particular emphasis on those requirements that are most closely related to improving educational results for children with disabilities. Vermont state law requires local education agencies to provide appropriate special education and related services and requires the Vermont Department of Education (VTDOE) to establish, monitor and enforce regulations governing special education programs in the Vermont public schools and all institutions wholly or partly supported by the state. The state has adopted regulations implementing those requirements which are administered by VTDOE. VTDOE supervises and conducts the general supervision process in furtherance of the state's obligations under IDEA and Vermont law.

Focused Monitoring is a new approach to assess compliance with federal and state special education law and regulations while also addressing critical performance areas. It is a shift from a culture of compliance to a culture of accountability. It places the focus of a monitoring review on results versus process. The principles of Focused Monitoring are identified as follows:

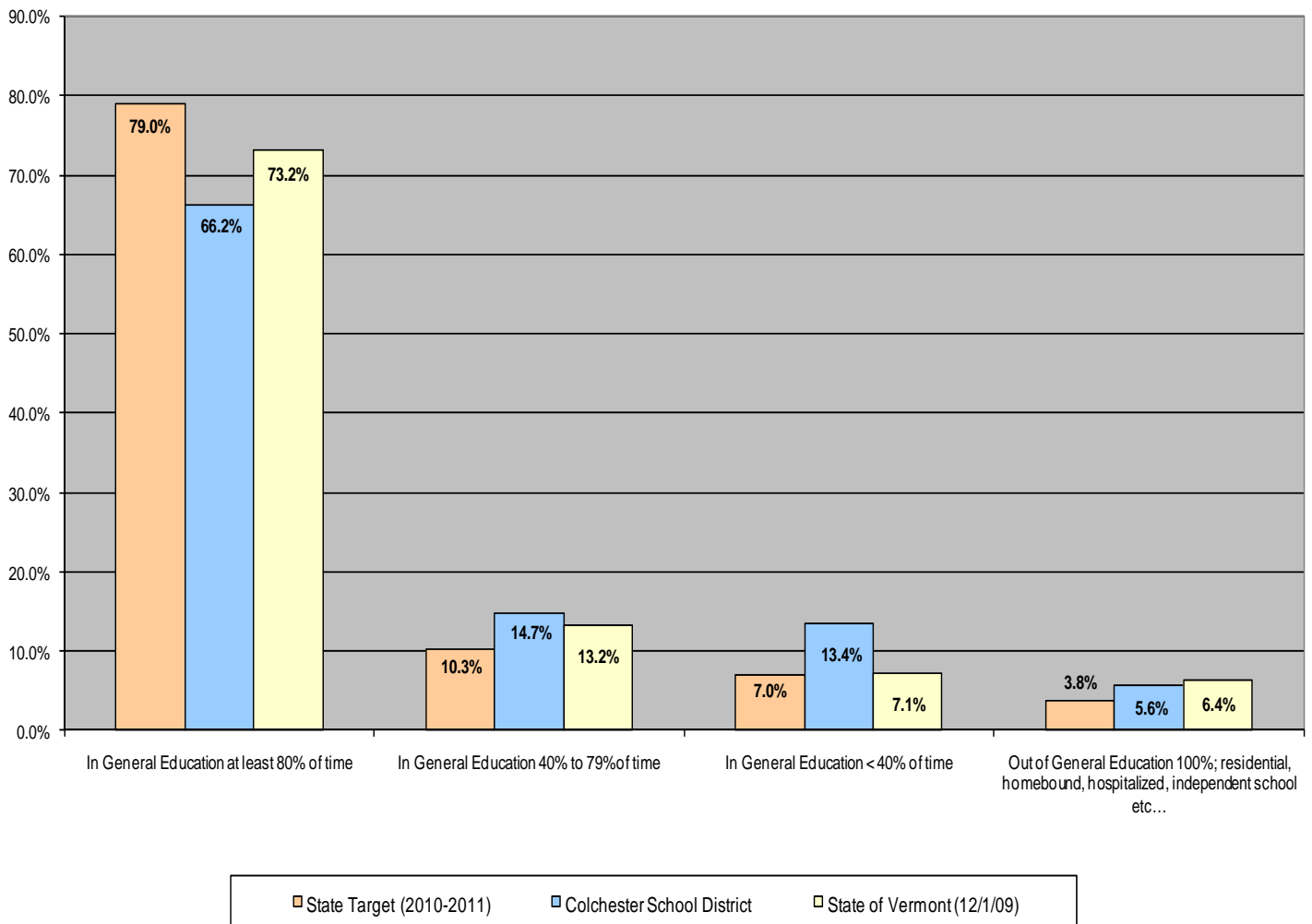
- Focused Monitoring includes a limited number of priorities chosen by a diverse group of stakeholders.
- Available data are used to select priorities that will improve student educational performance, increase independence for children with disabilities and lead to full participation in society.
- A limited number of indicators are identified within each priority area and are used as the basis for district ranking and selection for on-site reviews.
- A Focused Monitoring system is data and information-based. Data-based information is used to allocate limited resources in the direction of most need, which are determined by identifying what is most likely to lead to improvement in student performance.
- There is a relationship between monitoring and corrective actions—solutions are linked to identified problems. Corrective actions are designed to create systemic changes that result in improved student performance.
- Families have the opportunity to provide information on a continuous basis.

II. Focused Monitoring Methodology

The Colchester School District (CSD) was selected for an on-site visit during the 2010-2011 school year based upon their performance on the State Performance Plan (SPP) Indicators 5 and 6 (Least Restrictive Environment (LRE)) and Indicator 2 (Drop Out) for the 2009-2010 school year. Colchester was also selected as Mallet's Bay School did not make Adequate Yearly Progress (AYP) for students with disabilities during the 2009-2010 school year.

Even though CSD was selected on 2009-2010 school year data, VTDOE staff reviewed the most recent information to have a more accurate picture of the supervisory union. The graphs below document the 2009-2010 state target, the state's average performance and Colchester School District's performance in regards to the indicator(s); please note that both graphs include students aged 6-21.

Colchester Least Restrictive Environment (LRE) Data 12/1/09



Another criteria used in the ranking and selection of schools for a Focused Monitoring visit is Drop Out data for students with disabilities. What follows in CSD's Drop Out data:

School Year	Statewide Special Education Dropout Rate	CSD Special Education Dropout Rate	State Performance Plan Target	Meets or Exceeds Target?
2008-2009	3.9%	2.17%	No Target: Baseline Data Year	

The data indicates that CSD is below the Statewide Special Education Drop Out Rate for students with disabilities.

The last piece of data analyzed in the selection of Supervisory Unions/School Districts included whether or not a school within an SU/SD was determined not to have made AYP (Adequate Yearly Progress) for students with disabilities. Mallets Bay School fits this criterion.

The on-site Focused Monitoring review was conducted during the week of March 14-18, 2011. The team visited the following schools:

Colchester SD Schools	Grades
Colchester High School	9-12
Colchester Middle School	6-8
Mallets Bay School	3-5
Porters Point School	K-2
Union Memorial School	EEE-2

In addition to the five schools, The Monitoring Team also visited three alternative programs and the Essential Early Education (EEE) Program.

1. Colchester Alternative Program (CAP) which is located off campus for grades 9-12
2. Crossroads ~ an alternative program at the High School
3. Infinity ~ an alternative program at the Middle School

The Monitoring Team also reviewed and analyzed the following data prior to, during and after the on-site review.

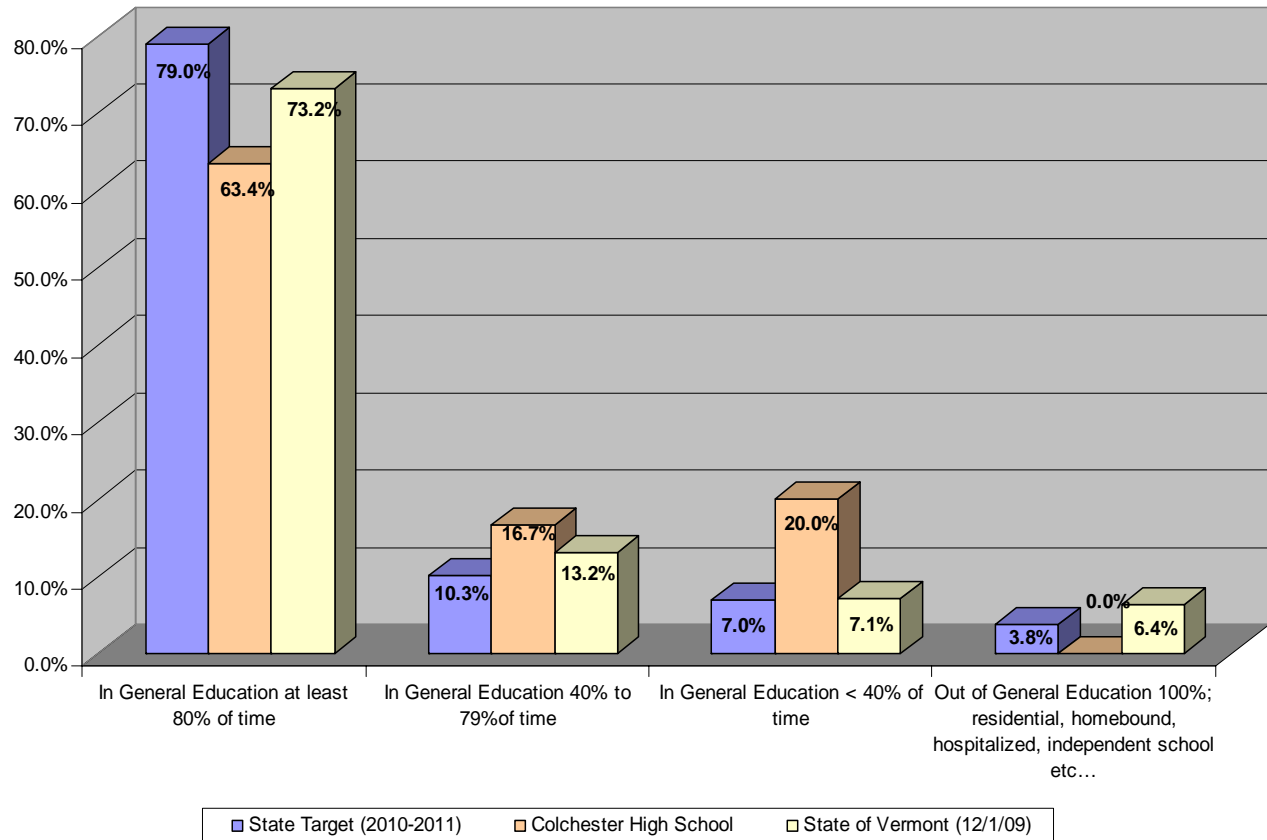
Data Reviewed

- Various data by disability, grade, school building and Indicator (not an exhaustive list)
- LEA Profile
- Vermont Agency of Human Services Community Profile 2007
- Local Report of State Performance Plan indicators
- Special education policies/procedures/forms/practices
- Family/school collaboration related to the indicator(s) via parent survey monkey and parent interviews (in person and by phone)

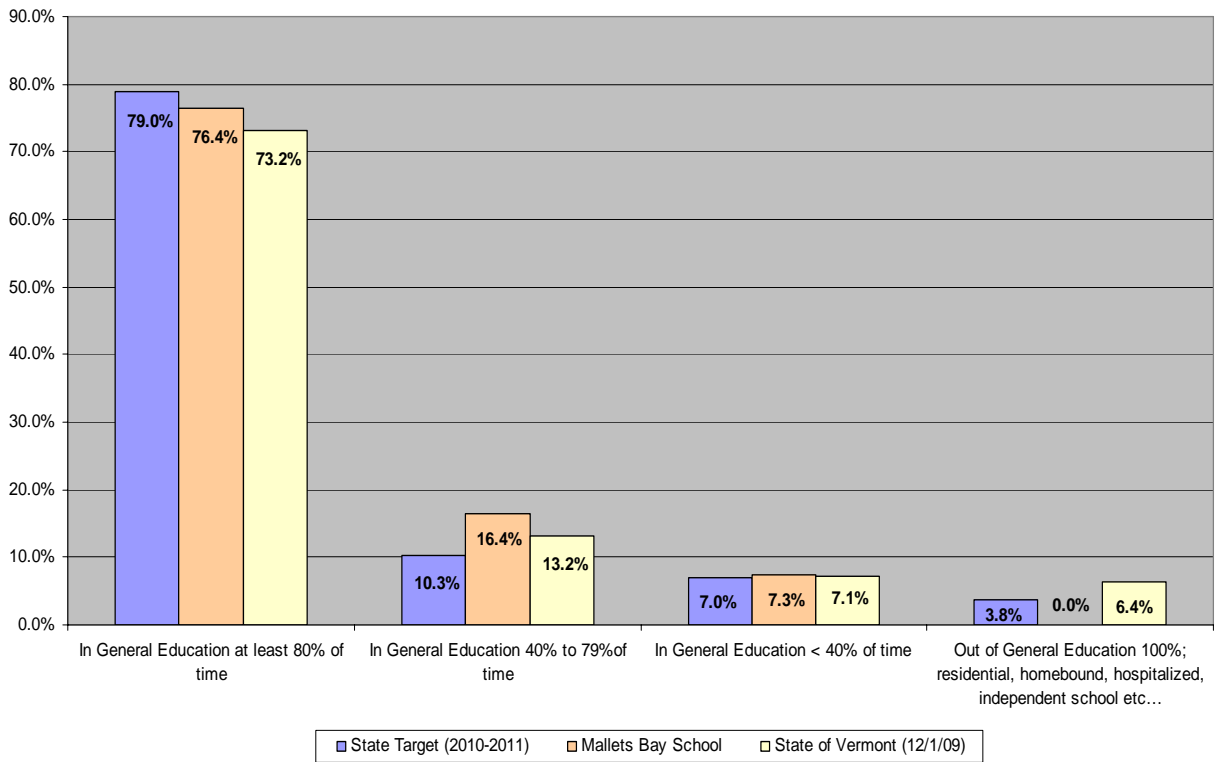
Various data by disability, grade, school building and Indicator

What follows is the LRE data by school. Please note that these graphs are based on December 1, 2009 Child Count (most recent, verified data available)

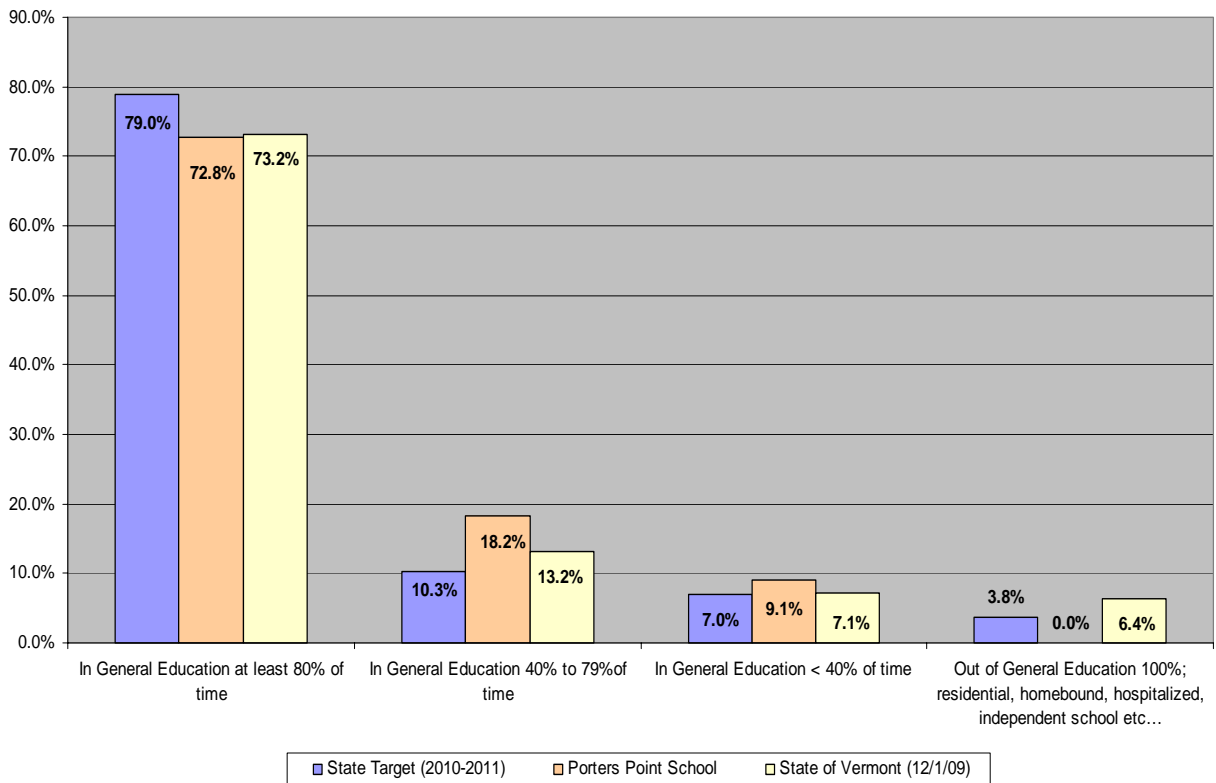
Colchester HS LRE



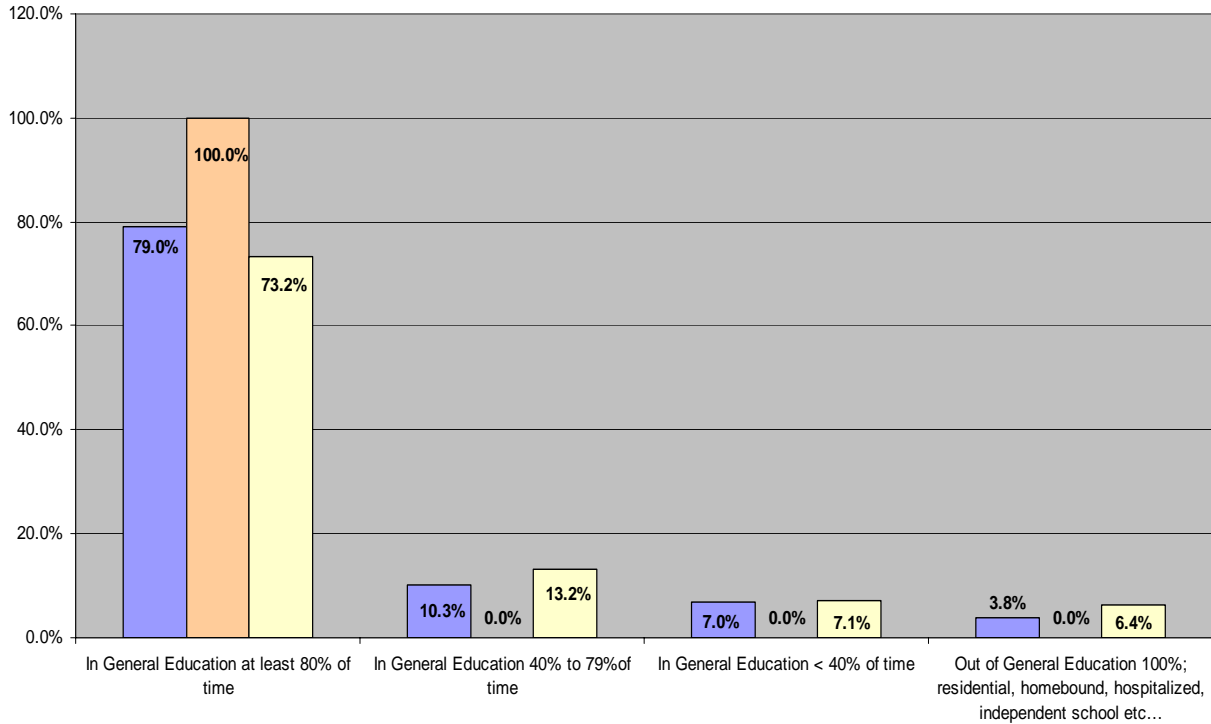
Mallets Bay School ~ LRE



Porters Point School ~ LRE



Union Memorial School ~ LRE



Based on the above graph, Union Memorial School's Least Restrictive Environment more than 80% of the time. Colchester High School's LRE data indicates that fewer students are more than 80% in the general education environment when compared to the State Target and Vermont's percentage.

While it's not reflected in the above graphs by building, Colchester School District had 10 students whose Least Restrictive Environment placement was outside of the general education environment at one of the following Independent Schools:

1. Baird Center
2. Bennington School
3. Centerpoint
4. Jean Garvin
5. Augmentative Learning and Movement Center
6. Vermont Alternative Program

The chart below identifies the most prevalent disability categories in the Colchester School District in the last five school years.

Colchester	2005 2006	2006 2007	2007 2008	2008 2009	2009 2010
Autism Spectrum Disability	*	*	13	20	30
Developmental Delay	26	33	35	34	31
Emotional Disturbance	63	70	70	66	58
Learning Impairment	25	26	21	23	19
Other Health Impairment	45	52	47	47	43
Specific Learning Disability	59	58	47	53	54
Speech or Language Impairment	20	17	17	19	17

*denotes 10 or less

The chart indicates that in the last three years, the Autism Spectrum Disability (ASD) Category has more than doubled. The Emotional Disturbance category has decreased while the remaining disability categories have remained relatively constant.

Colchester	2005 2006	2006 2007	2007 2008	2008 2009	2009 2010
TOTAL child count	249	274	259	274	262

In the last five years, the overall number of students with disabilities has increased however; CSD's child count has decreased by 12 students between the 2008/9 and 2009/10 school years.

The chart below identifies how CSD compares to State percentages for the 2009-2010 school year. The data indicates that CSD's percentage for ASD is more than double the State percentage. As well, the Emotional Disturbance (ED) percentage in CSD is more than eight (8) percentage points above the state percentage.

Conversely, the Colchester School District's percentage for Developmental Delay (DD), Specific Learning Disability (SLD) and Speech/Language Impairment (SLI) are much lower than the State percentage during the same time frame (2009-2010).

While Colchester School District's percentage of students eligible for special education (12.27%) is below the State percentage (15.35%), CSD may want to examine

Disability	State	Colchester School District
Autism Spectrum Disorder	5.32%	11.45%
Developmental Delay	17.07%	11.83%
Emotional Disturbance	13.84%	22.14%
Learning Impairment	6.18%	7.25%
Other Health Impairment	14.52%	16.41%
Specific Learning Disability	29.14%	20.61%
Speech/Language Impairment	10.99%	6.49%
Overall	15.35%	12.27%

Parent Survey and Input

A letter was sent to all parents of students (with disabilities and without disabilities) in the Colchester School District prior to the on-site visit. Included in the letter was a link to a survey monkey. Parents were asked to submit their responses to the survey prior to the on-site visit with their answers based on their families' experiences in school district. CSD adequately and appropriately notified parents of the FM on-site visit. More than 30 parents and students were interviewed in person or over the phone or submitted responses to the survey monkey.

What follows are some examples of the responses generated from the parent survey:

In what ways has the school supported you in helping your child, such as providing you with information about school resources, programs, supports and services?

- *His Case Manager tries to find a nice balance between what my son needs and what he wants.*
- *They have been awesome working my child and accommodating her needs.*
- *The school has listened to my concerns and been open to learning about my son's special needs. He really has not used much in the way of special services since he has been in middle school.*
- *Sharing information at IEP meetings*
- *They try different strategies when one doesn't work. They include me in meetings once a month and they listen to me and each other.*
- *Only Title one. Which I don't think is enough.*
- *Through periodic 504 update meetings and emails*
- *School is finally giving her some help but I have been after them for years. I did a lot of research on my own. Did not always have the support of the school.*

- *The Student Support Services expressed concerns about grades and possible ways to accommodate and/or test my son for ways to help him learn.*
- *They have been very good in establishing the 504 plan and making sure that all the teachers follow through with the requirements. With the first mid-term exams we were nervous. The teachers were all great and followed the 504 plan to a tee. We were very happy with the teachers.*
- *The EEE Program has been very helpful in providing us with Support information and programs for our son*
- *They follow his IEP, always responsive when I call and helping him to become a confident student*
- *I have not received supports. I feel it has been myself who has had to initiate any communication between his teachers and spec educator.*

How does the school provide opportunities for you to express your concerns with your child's IEP and educational placement?

- *We have case management as well as teacher parent conferences. I communicate via email often with his CM.*
- *Open communication with special educator. Treated as a 'true' team member.*
- *This year's principal sat down w/us and helped create a plan w/ the staff.*
- *Open invitation to communicate at anytime with Special Education Dept.*
- *I feel free to call whenever a problem or question arises (not often does this happen).*
- *Meetings with the teacher and special educator(s)*
- *100% cooperative*
- *I have contact with his special educator.*

On-Site Interviews

Interviews were conducted with 12 general and special education administrators from the district schools and CSD Central Office staff and 50 general and special education teachers and various other personnel.

Record Reviews

Focused file reviews were conducted for 39 students with Individualized Education Programs (IEPs) and at least 25 Section 504 Plans and Educational Support Team (EST) Plans. Other documents including EST referral forms, discipline reports, policies and procedures were also reviewed as appropriate.

Classroom Observations

At least ten classroom observations were conducted throughout CSD. These observations were conducted in both general education and special education classes/programs including three alternative programs (Crossroads, Infinity and the Colchester Alternative Program (CAP)).

III. School District Background

The following information is taken from the 2007 Agency of Human Services (AHS) Community Profile. The AHS profiles use supervisory union/school district boundaries when presenting data for a particular community. Thus, the information below concerns the town of Colchester.

Colchester School District		
School Name	Grades Served	2010-2011 Approximate Enrollment
Colchester High School	9-12	780
Colchester Middle School	6-8	490
Mallets Bay School	EEE & 3-5	490
Porters Point School	K-2	235
Union Memorial School	K-2	200

According to the Agency of Human Services, the total population for this community in 2006 was 17, 180. The following information comes directly from the AHS profile:

2006 AHS Profile	CSD/Community Percentage	Vermont	Difference
Percent children in families receiving food stamps (proxy for children in poverty)	8.0%	13.7%	-5.7%
Percent of children (ages 5-17) in families receiving welfare (proxy for poverty)	2.4%	4.3%	-1.9%
Custody rate for children (per 10,000 ages 10-17) deemed unmanageable	19.9%	28.5%	-8.6%
Custody rate for children (per 10,000 ages 10-17) deemed delinquent	57.7%	52.7%	+5.0%
Percent of high school seniors with aspirations for education, vocational training or employment (2005)	90.0%	85.0%	+5.0%
Percent of graduating high school seniors who continue their education within 6 months	74.0	69.0%	+5.0%

IV. Commendations for the LEA

Relative to the State Performance Plan Indicators 5 and 6 (LRE), State Performance Plan Indicator 2 (Drop Out) and AYP (Adequate Yearly Progress) determinations for students with disabilities (no indicator, but VTDOE priority), the following efforts and/or initiatives have been implemented by the Colchester School District. These activities have been recognized as effective components in CSD's system for improving student outcomes.

- Staff at the Middle School, High School, and Union Memorial School have a common philosophy of shared ownership which embraces inclusionary practices.
- CSD is commended for being proactive in examining the CSD paraeducator model (Project Evolve).
- Parents (Survey Monkey) reported that communication with the special education staff is excellent.
- The use of technology (i.e. POWERSCHOOL, Sharepoint, SpEd.Doc) enhances communication within the CSD and between staff and families.
- Parents and staff at Malletts Bay School report that the current principal has had a positive impact on the school climate and on the implementation of best practices reported that special educators
- Staff reported a purposeful transition process for students entering and exiting the Middle School.
- The CHS has a positive and supported school environment that ensures that the needs of all students are respected, valued and addressed.
- All students have access to extracurricular activities at the high school.
- CSD has supported the implementation of the Social Cognition Program through a well structured, tiered level of district-wide training. VTDOE encourages the continuation of this program within the CSD.
- CSD collaborates with various local agencies and resources to support all students (i.e. Colchester Recreation Department, Stern Center for Language and Learning and Howard Mental Health)
- The alternative programs (Infinity and CAP) have a positive impact on student attendance and engagement.
- The Infinity Program staff is commended for their work this year in restructuring and revitalizing the program to meet the needs of the students.
- CSD has increased their focus on the collection and analysis of data to inform decisions.
- Despite some budgetary cuts, there are a wide variety of supports and services available to all students within the CSD:
 - Emergent Reader (Union, Porters Point)
 - Homework Clubs (Middle School, High School)
 - Social Work Positions (all schools)
 - Strategic Math and Reading (Middle School)
 - Title I Programs
- Leadership Teams are commended for their efforts in providing comprehensive professional development opportunities that reflect the needs of each school community
- Professional Development in CSD has focused on some of the following areas:
 - Differentiated Instruction
 - Climate
 - Collaboration

- Social Cognition
- Despite time constraints, special education staff make an effort to communicate and collaborate with general educators and paraeducators on a regular basis.
- Paraeducators and teachers expressed that special education staff are approachable and are always willing to provide consultation and discuss specific students or other issues.
- The Middle School and High School employ professional staff in their Planning Rooms. This staff collects and analyzes data to inform appropriate actions or next steps.
- CHS offers various ways for students to recover lost academic credits:
 - CAP
 - Transition Classes
 - Senior Camp
 - High School Completion
 - Summer School
 - Target Grad
- The High School has fully implemented POWERSCHOOL in less than one year providing access to parents, students and staff. A weekly review of POWERSCHOOL by the administration ensures staff accountability.
- Special education files are well organized and undoubtedly makes it easier to access information.
- The Crossroads and the Colchester Alternative Program are commended for providing educational, vocational, and community experiences to its special education population.

V. Triangulated Areas for Improvement (TAFI)

The Monitoring Team must validate a concern through three separate sources of data to determine that the concern is a triangulated area for improvement. These triangulations of data make certain that the information is truly valid and reliable. CSD must respond to these areas of improvement in the Improvement Plan. Other issues or areas of concern (see Section VI of this report) that cannot be triangulated are identified, but they do not rise to the level of an area for improvement. The Colchester School District is encouraged to consider these issues and concerns within their Improvement Plan.

- ***TAFI I: Colchester School District (CSD) does not currently have a comprehensive Early Childhood system that includes a full continuum of services for children ages 3-5.***

Supporting Evidence:

1. There are 29 children identified as eligible to receive Essential Early Education (EEE) services within the CSD.
2. 11 of the students receive direct speech services as their **only** special education service. Staff and parent interviews reported that these students are not afforded the opportunity to attend an early childhood classroom environment (which may be the Least Restrictive Environment ~ LRE)
3. The LRE for the remaining 18 students is a separate special education classroom, which is a non-inclusive educational environment.
4. An observation of the EEE classroom (10 students) identified that 80% of the children are eligible for Early Childhood special education (an inclusive setting requires that at least 50% need to be typically developing peers)
(As defined by the Office of Special Education Programs)
5. The current Early Childhood classroom at CSD does not include a general education teacher. **(also a instance of noncompliance and is reflected in the compliance section of this report)**
6. The current Early Childhood Individualized Education Programs (IEPs) do not identify a general education teacher as being invited and in attendance at Evaluation and Planning Team (EPT) or IEP meetings. **(also a instance of noncompliance and is reflected in the compliance section of this report)**

VI. Areas of Concern/Recommendations

- 504 Plans should be reviewed as often as IEPs are reviewed (annually).
- Reevaluations for 504 eligibility should occur at least every three years
- The 504 “binder” at the Middle School should be updated regularly to be an effective tool.
- Staff and Administration at Mallets Bay should continue the discussion regarding the shared ownership and inclusionary practices for special education students.
- CSD should consider revisiting the school board decision to opt-out of Act 62. The benefit of Act 62 would likely increase opportunities for all children to access an early childhood education experience in support of kindergarten readiness.
- Partnerships with community based preschool programs would increase opportunities for children with disabilities in CSD to participate in developmentally appropriate inclusive environments.
- The “Time Away” space at Porters Point will be in direct violation of the new seclusion and restraint regulations (effective August 2011). As PBiS will be implemented during the 2011-2012 school year, it is imperative that this space be redesigned to address students’ social and emotional needs in a positive manner which follows evidence based practices.
- On the IEP, Present Levels of Performance for each basic skill within the goal/objective section should be completed
- According to the service pages in several IEPs and via interviews, all specialized instruction for students is being delivered by paraeducators. CSD should review the current service delivery model to ensure that this is an effective and efficient way of providing services (supervision of paraeducators) to students with disabilities.
- It is recommended that the Crossroads Program and CAP develop a system to target and track student post graduation outcomes to inform their program planning.

VII. Non-Compliance with State and Federal Rules & Regulations

Findings of Non-Compliance

Non-compliance findings are violations of state and/or federal rules and regulations. The following findings of non-compliance must be corrected within one year from the date of this report. Colchester School District must include a response to each of these findings in the Improvement Plan. A separate list will be sent to the Special Education Administrator with student specific information.

Individual and/or Systemic Findings of Non-Compliance:

1. Special education goals do not always have a corresponding service
2. At Porters Point School, not all special education services are being provided as written in IEPs as special educators are called to attend to other students' behavioral crises
3. IEP meetings held for Grand Isle Supervisory Union (GISU) students do not always have a GISU LEA Representative
4. Postsecondary Transition planning for students does not always include the required components
 - a. i.e. inviting outside agencies, inviting students
5. There is not a continuum of LRE or services in EEE
6. At least one reevaluation was not completed by the triennial date
7. Not all required team members are documented as invited or in attendance at IEP or EPT meetings
 - a. General educators at EEE
 - b. Outside agencies for post secondary transition
8. The location of services cannot read **in or out** of the classroom
9. The provider of services cannot read as "special educator **or** paraeducator" ~ "SLP **or** SLPA"
10. EEE files did not include information from Part C, including evaluations or Individualized Family Service Plans (IFSP)
11. Not all files included an Access to Records form (already corrected)
12. **Personal Care** is not a special education service (individual special education basic skills must be identified on the service page)
13. IEPs for students who have moved into CSD have not been re-written (minimum of new cover page with new IEP membership)
14. At least two files did not appropriately document the Disability Determination
15. At least two files did not appropriately document Adverse Effect
16. One student's file identified one disability in the evaluation, and a different one on the IEP (child count)
17. Child Find activities are not identifying all pre-school children with disabilities
18. Budgetary constraints cannot be identified as the reason for services not being made available to eligible students
19. The current Early Childhood Individualized Education Programs (IEPs) do not identify a general education teacher as being invited and in attendance at Evaluation and Planning Team (EPT) or IEP meetings.

VIII. Improvement Planning Process

Upon receiving the final report following a Focused Monitoring visit, the LEA is required to initiate the development of an Improvement Plan (which includes improvement activities related to the priority indicator and correction of non-compliance) with your VTDOE Monitoring Facilitator (if appropriate) within a period of 60 calendar days from the date of the final report. The Improvement Plan should be a comprehensive, interdisciplinary plan that targets LEA-wide improvement. In developing the plan, the LEA should consider the *Triangulated Areas for Improvement* (TAFI) and supporting evidence, *Recommendations*, *Findings of Non-Compliance*. As needed, the VTDOE Monitoring Facilitator will provide technical assistance and consultation during the development of the Improvement Plan. It is important to note that improvement activities may extend beyond one year, but the correction of non-compliance must happen within one year from the date of written notification via the final report.

In order to assure that the Improvement Plan is comprehensive, interdisciplinary and LEA-wide, the plan must be developed by a collaborative team which includes general and special education stakeholders. This plan must not be a uniquely special education response developed in isolation from other LEA initiatives. The VTDOE Monitoring Facilitator provides technical assistance to the team in the vein of a facilitator. The Monitoring Facilitator may not provide the technical assistance that the LEA identifies it needs, but rather functions as a liaison for needed services.

Development of the Improvement Plan will include:

- Use of the VTDOE template to develop the Improvement Plan
- Review of the areas of non-compliance and the expected evidence of change in the final report
- Coordination of the Improvement Plan with other LEA initiatives
- Addressing the following components per activity:
 - What specific tasks/activities are planned to address the targeted area?
 - Why were these particular tasks/activities deemed most appropriate?
 - When will the tasks/activities be completed?
 - Who will complete the tasks/activities?
 - Why will this activity work to bring the LEA into compliance?
 - Who will monitor the progress and completion of activities?
 - What are the needed resources (fiscal, human) within/outside the LEA that will be used to implement change?
 - What are the deliverables, products, materials, documentation or action plans that will be developed?
 - How will progress be monitored to ensure that the expected changes take place (self-assessment)?
 - What are the intended outcomes/impact related to the targeted area?

The VTDOE Monitoring Team reviews the LEA's proposed Improvement Plan, requesting clarifications and revisions, as necessary. Upon approval of the Improvement Plan, the LEA is issued an approval letter that outlines the schedule of reporting the LEA's progress monitoring to VTDOE. The purpose of this Monitoring Progress Report is to provide the LEA with a format in which to demonstrate evidence of their efforts to correct the deficiencies identified through the Focused Monitoring process. In addition, the process allows the LEA to monitor and evaluate the

success of their Improvement Plan activities. The scheduling of the progress reports depends on the complexity of the Improvement Plan and the individual needs of the LEA.

Prior to the one year anniversary of notification via the final monitoring report, review meeting is scheduled between LEA representatives and the VTDOE Monitoring Facilitator to assess whether the LEA has met or is making adequate progress towards meeting the required evidence of change at the expected standard as set by the collaborative team and approved by the VTDOE. Based on the results of the meeting, the VTDOE determines whether (1) the LEA has met the standards required and the Improvement Plan is officially closed, (2) the LEA has not met the standards required and additional time will be allowed with Improvement Plan amendments or (3) sanctions will be imposed. The correction of non-compliance must occur within the one year timeline; the above refers to improvement activities related to the priority indicator.