

Site Review

Initial Approval – Expeditionary School at Black River (ESBR)

Independent School Review Report General Education

Site Review Conducted - March 30, 2022

Submitted by Independent School Review Team:
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Site Review Scope of Work and Purpose

The Expeditionary School at Black River (ESBR) requested consideration for initial approval, from the State Board of Education, to become a general education independent school. The approval application and requested supporting documentation was received by the Agency of Education's Independent School team, as established under current Rule Series 2200.

The school indicated, on the initial application, that ESBR's program was designed to serve children with a particular disability or disabilities generally. ESBR did not submit an accompanying special education application.

General Education

State Board of Education Rule 2225.2, 2225.5

School Philosophy & Educational Objectives

Members of the agency's Independent School team met with ESBR staff on Wednesday, March 30, 2022. Interviews were conducted at the school's only facility, located on Main Street in Ludlow, VT. This building previously served as Black River High School, which closed at the end of the 2018 school year. ESBR personnel present for interviews were the head of school, part time STEM instructor, part time math instructor, part time literary interventionist, part time one on one life coach who also provides school counseling services one day a week. The math teacher is an unpaid community volunteer. During the exit interview, two Governance Board members were also present to receive feedback from AOE review team members as well as obtain technical assistance pertaining to statutory and Board Rule initial approval requirements.

School Philosophy

ESBR's initial approval application states that:

"The Expeditionary School at Black River's (ESBR) philosophy is anchored in the principles mandated by Act 77: Flexible Pathways to Post-Secondary Completion (2014). Guided by personalized learning and proficiency-based grading, ESBR uses an integrated curriculum design to offer 7th -12th grade students the opportunity to learn anytime, anywhere. ESBR's philosophy is predicated on the belief that when learning is self-paced and self-directed, all students are more likely to be fully engaged and empowered to develop their skills. A strength-based approach to personalized learning, coupled with a proficiency-based grading system, invites each individual to be at the center of their learning in all aspects of their life."

Program Objectives

Expeditionary School at Black River's initial approval application states ESBR's mission is "to educate students to be intellectually curious, resourceful, and confident in themselves for a life of personal fulfillment and civic engagement. As described in the Profile of a Graduate (page 7 of the Program of Studies), the school's educational objectives are to develop each student's college and career readiness skills. "Over the course of their 7th-12th grade learning trajectory, ESBR students are expected to demonstrate evidence of these dispositions: learner agency, critical thinking and problem-solving, well-being, global citizenship, communication, and academic proficiency. Ultimately, the school's goal is to establish a system of flexible

pathways, where each student is able to self-direct and pace where, how, and when they hone each of the dispositions outlined in the Profile of a Graduate.”

ESBR’s mission and stated objectives are included in the school’s manual of operations and provided to parents at the time of student enrollment. The head of school reported that the school is moving toward implementation of Empower Learning’s digital system that includes components for grading, generation of student progress reports, curriculum development and assessment to support student learning choices.

School Enrollment

16 V.S.A. §166(b)(4), State Board of Education Rule 2225.3

Agency review team members confirmed that ESBR’s enrollment is currently sixteen students in grades, seven through twelve. The head of ESBR is seeking a maximum enrollment of 40 students. Once approved the school will follow a traditional academic calendar, of 179 -181 days. ESBR’s current students are enrolled by parents/guardians. Currently ESBR is a recognized independent school and not eligible to receive public tuition.

ESBR’s student enrollment filing system was reviewed by independent school team members and found to be incomplete. AOE’s review team, prior to site review, received special education information from Two Rivers Supervisory Union (TRSU). The LEA’s special education director informed AOE review team that it had developed four service delivery plans for Mt. Holly students. These service delivery plans were not included in each Mt. Holly student’s official file. TRSU sends a licensed special educator to the Expeditionary School to provide push-in specialized instruction in math, weekly.

ESBR is currently revising the school’s criteria for admissions. ESBR admissions committee, starting FY23, will require interested students/families to provide a letter of intent, a copy of LEA transcripts, verification of student behavioral data and copy of school attendance records with the application. The agency’s review team members provided technical assistance, during exit interview, regarding implementation of Act 173’s admission requirements as well as new independent school rules.

Governance

State Board of Education Rule 2225.4

ESBR is a 501(c)(3) organization. The Governance Board is comprised of volunteers that serve three-year terms. A board chair and vice chair work to ensure both school staff and board members “adhere to the 108-page school [operations] manual.” Additionally, a member of the board serves as fiscal officer and another board member serves as a secretary. ESBR’s operation manual includes polices for both school and board members to guard against conflicts of interest as well as enumerates specific prohibitions against discrimination throughout the entire school community.

Governance Board members take a regular and active role in the daily running of the school, fund raising, oversight of business management, development of school programming including annual evaluation of head of the school. The head of ESBR reports directly to the Governance Board. Additionally, the head of ESBR is responsible for “...managing faculty and student body.”

Minimum Course of Study & Required Assessments

16 V.S.A. §166(b), State Board of Education Rule 2225.5

ESBR's initial approval application states that the academic program is based upon proficiency-based curriculum, personalized student learning plans and provides opportunities for student engagement in project-based learning activities. Students must also complete financial literacy courses and attend classes in fine arts, performing arts, cultural studies, music, outdoor education, and environmental studies.

Instruction is provided using several modalities, virtual 1:1, in-person small group activities, a traditional classroom setting, in-person individualized project-based learning, one-on-one direct instruction, outdoor education, and community-based education programming that utilizes community partners to enrich academic program goals.

The Agency of Education's review team found that classroom instruction did align with the school's stated philosophy and objectives. Core classes are scheduled for 30 - 60 minutes three times a week by either part time instructors or volunteers from the broader community. English Language Arts and history instruction is provided by the head of school, who is currently the only full-time instructional staff member. The school counselor provides some instruction in humanities, part time. It was difficult to discern how much of each week's academic instruction time is offered on-site vs virtually through Google classroom. When in school, students access Google classroom to post completed work, receive assignments from instructional staff and directions for activities scheduled for the following day.

The agency's review team observed classes in English, Science Technology Engineering and Math (STEM) and history. Each of the traditional classrooms, when scheduled, include students in grades seven through twelve. At the time of class observations, formal lesson plans were not available, for review. AOE review team members did not find that ESBR teachers' instruction methods for addressing appropriate multi-grade, differentiated instruction, as needed, to determine grade-level proficiencies, skill and cognitive development or methods of authentic assessment reflective of student progress.

It appeared to the AOE representatives, during STEM class observation, that class is not regularly provided in-person throughout the week. The observed lesson's directions required students to use specific tools to complete a summary activity; however, the instructor did not provide all the necessary materials or know how to locate them in the classroom. Students were organized in groups of three to promote peer tutoring, and to promote high interest engagement throughout the class. Students were receptive to the activity and engaged. It is unclear to the review team how long the STEM instructor has been employed by ESBR and if STEM opportunities were provided previously. ESBR supports the school's science program by visiting Vermont Institute of Natural Science (VINS) in Quechee, Vermont. History and social studies instruction are provided as part of a humanities curriculum.

Math instruction is provided by a community volunteer, three times a week and consists of pre-algebra, algebra I & II, and practical math. Math support services are provided by a "math intern." A financial literacy course is a required as part of ESBR's curriculum and provided by a

volunteer from the local branch of People’s United Bank, in Ludlow. To graduate, students are required to “articulate foundational strategies for being a financially literate citizen.”

When meeting with instructional staff individually, AOE representatives asked if written lesson plans were required by the head of school, as well as reviewed as part of regular staff supervision. Each interviewee reported formal lesson plans were neither required nor part of an instructor’s informal, conversations with the head of school. When asked, the head of school, reported that it is not currently an expectation that: instructors align curriculum with ESBR’s stated objectives, develop formal lesson plans to include identified learning goals by student grade, include evidence/documentation of proficiency-based student evaluations or attend regular staff supervision.

At the time of review, the Agency of Education’s review team found that ESBR’s academic programming did not meet Minimum Course of Study requirements, as mandated, by Rule 2225.5.

Mt. Holly’s director of special education forwarded service delivery plans to ESBR for several students. Each of Mt. Holly’s student IEPs provided evaluation data on each student’s deficits as either “far below”, “well below” or “below average” grade-level student achievement, in both math and English. Each of the IEP/504 Plan students were identified as requiring significant support in cognition in both math and English, requiring specific supports in decoding language and needing extra time as well as access to instructional tools for accessing each content area of the curriculum.

Currently, Mt. Holly provides limited, push-in math specialized instruction services, as required by each student individualized education plan (IEP). Services are delivered by the LEA for forty-five minutes sessions, twice a week. ESBR’s volunteer math instructor indicated that she has not met with and does not collaborate with Mt. Holly’s special education service provider for purposes of accommodating curriculum for IEP/504 Plan students. Furthermore, some of the math instruction is delivered by a 19-year-old college freshman volunteer. The math instructor stated that the head of school updates and provides student information, when needed.

A part time reading specialist at ESBR provides nine hours of remote literary skill support per week via Google Classroom. Services are provided through small, intensive need, homogeneously grouped classes comprised of two – three students, or provides one-on-one specialized instruction. Students identified as needing additional support in English were evaluated by the literary specialist using her own assessment tools and based in Orton Gillingham approach. All support services are conducted via Google Classroom remotely. No in-person literacy support is provided by the school’s literary specialist.

Agency review team asked the literary specialist to describe how she works with LEA staff to support student learning, by grade and per IEP/504 Plan requirements. The specialist reported that she has not met and does not work with LEA staff and has not read student IEPs, 504 Plans or the service delivery plans provided by Mt. Holly school district. Instead, the literary specialist prefers not to be “biased by LEA’s student eligibility information” and “assess

student's needs using my own assessment methods." Literary support interventions are not provided on campus and specialized support for each of the three student groups, or one-on-one interventions are scheduled virtually for one hour each day.

Professional Staff

State Board of Education Rule 2225.8

Most of ESBR's instructional staff are either paid part time employees or volunteers. Currently, three of the part time staff are paid, the remaining instructors volunteer their services. The head of school, who also instructs in English and in history, is the only full-time staff member. A part time literary specialist is trained and credentialed in Orton Gillingham and provides 1:1 literacy support for most students virtually or as stated previously, in small group setting, virtually. Of the sixteen students currently enrolled, eight are new to ESBR this year, and have participated in the literacy specialist's independent evaluation assessments.

High interest activities are provided by part time paid and pro-bono community members in languages, performing arts, fine arts and arts and crafts.

During interviews with instructional staff and the head of school, it was revealed that ESBR staff do not participate in any annual or required professional development. Staff do not currently engage in individualized, content area professional development. AOE staff cited, for the head of school, the State Board Rule 2225.8 .2 requirements for professional development and the need to develop clear expectations for all staff. ESBR does not currently evaluate staff members. The head of school is currently working with school staff to outline a template for conducting future staff evaluations.

ESBR does not engage in regularly scheduled staff meetings with mandatory attendance by classroom instructors or support specialists. Student progress is not currently reviewed by entire staff through regularly scheduled progress meetings. Currently, student needs are addressed informally, in conversation, between the head of school and each instructor. The head of school confirmed that student progress conversations were not currently documented. Given the current lack of documentation for formal curriculum, lesson plans and evaluation of student progress, it is unclear how ESBR will help students meet graduation requirements.

Staff curriculum vitae records were sent to the Agency of Education with initial approval application. During the exit interview with two Board members and head of school, AOE personnel reminded ESBR of requirements to meet professional development requirements under Rule 2225.8.2 to maintain approval status, specifically to address subsections:

- (1) A general statement of the institution's expectations for professional growth of staff.
- (2) A statement describing the school's in-service training and financial and other support given to staff for professional development.

Staffing Safeguards:

Interviews with all ESBR's instructors and the head of school revealed that some current staff have not completed the fingerprinting or child/adult abuse registry process. Two staff members

disclosed, during individual interviews, that they had completed finger printing requirements, in the past, while employed at different educational entities. The head of school was instructed by review team members, to have the entire staff fingerprinted and to conduct child/adult abuse registry checks.

Mandatory Reporting Procedures:

ESBR does not have a published mandatory reporting policy, or a list of procedures with accompanying expectations in the current staff handbook, that complies with 16 V.S.A. § 251-260. ESBR's staff is not annually trained in mandatory reporting requirements or on how to address issues that arise during the school day, or to whom a staff member must report to in order to ensure the provisions of statutory requirements are met.

Health & Safety

At the time of the site review, ESBR did not have formal plans in place for fire drills, active shooter or remain in place polices for ensuring student safety during times of crisis. Staff are not regularly trained in emergency crisis management. Agency of Education review team members were unable to collect documentation of published polices to reflect the school's ability to comply with State Board Rule 2225.7.

None of ESBR's staff members are currently trained in or are required to hold CPR and First Aid certifications. During site review exit interview, the head of school, indicated that only two fire drills were conducted this year, and all emergency service policies are currently under consideration. When asked how the school currently addresses any emergencies that might arise, the head of school indicated that parents are contacted directly by phone.

Nursing Services, Medications, and Immunization Records:

ESBR does not employ a school nurse and does not administer any student medications. The school does not have any formal written policies for medical services. A review of student files revealed that student immunization records are not consistently included with other important information in each student's official file.

Only two of the sixteen student files, currently enrolled at ESBR, included immunization records. During the exit interview with the head of school, it was reported that ESBR did have an immunization record for each student; however, not properly included in each student's official file.

Hazing, Harassment & Bullying Policies

At the time of review, agency personnel confirmed that ESBR's discipline practices are an extension of the school's stated philosophy. No formal policy documents were available to indicate the school's compliance with 16 V.S.A. §1161a, which requires an approved independent school to adopt and implement a comprehensive plan for responding to student misbehavior. Student "infractions are dealt with one-on-one." However, the Expeditionary School at Black River does have a formal written policy for hazing, harassment and bullying which complies with statutory requirements under 16 V.S.A. §565.

Facilities

State Board of Education Rule 2225.6

ESBR currently utilizes the second and third floor of the former Black River High School building. The classrooms and all school spaces are clean, neat and student work is prominently displayed in each classroom and in common spaces. There is sufficient space to conduct academic, programming for each grade, seven through twelve.

At the time of review, the available certificate of occupancy (CO) was issued to the supervisory union, which was the former owner prior to Town of Ludlow's purchase of the building. The Division of Fire Safety was contacted to conduct an inspection of the facility. The school and the Town of Ludlow have signed a multi-year lease agreement through June 30, 2022 and renewal of the lease is currently under consideration. AOE representatives confirmed that emergency exits are unobstructed throughout the building.

Financial Capacity:

ESBR is 100% philanthropically funded, but only fifteen students can attend tuition free. If approved by the State Board of Education, the school's Governance Board and head of school expects to double student enrollment based on revenues they expect to receive through public funding.

ESBR provided a letter of the commitment and ability of the school to sustain its existence and to continue to fund its operation for the academic year 2021-2022 and beyond. This letter was signed/notarized by all the governance board members. Accompanying this document was an operating budget and net fund statement.

In 2020 ESBR's Governance Board adopted a plan to open for the academic year, 2020 – 2021 as a recognized school. The inaugural pilot year targeted an enrollment of 15 students with an operating budget of \$140,000.00. A sustained fundraising effort generated necessary funds for the school to operate for the entire school year. ESBR's Board began fundraising and applying for grants for the 2021-2022 academic year in March of 2021. As of June 30, 2021, ESBR had cash on hand substantially equal to the 2021- 2022 operating budget. Funding for the remaining budget will be raised through continued business/community donations and by employing the same fundraising model as this school year, an annual silent auction and wine tasting event which, in 2020, raised \$13,000.00.

The Expeditionary School at Black River has not undergone a fiscal audit. When agency reviewers inquired about ESBR's request for a line of credit with People's National Bank, the head of school stated it was denied.

Initial Approval Recommendation:

The Independent School review team cannot recommend initial approval, at this time, for the Expeditionary School at Black River due to identified deficiencies in the school's program. Program deficiencies have been confirmed in the following areas: Minimum Course of Study 2225.5, Title 16 §906, 2228.1, Mandatory Reporting Procedures 16 V.S.A. § 251-260, School Discipline Policy 16 V.S.A. § 1161a, Health and Safety requirements 2225.7, Professional Staff requirements 2225.8.2. The review team also questions whether ESBR has the financial capacity to remain viable.

Point-in-Time Site Review Addendum

Introduction:

Expeditionary School at Black River's (ESBR) initial approval site review visit was conducted on March 30, 2021, and the Agency forwarded the approved site report to ESBR on August 8, 2022. ESBR's administration and governance board members sent their response to this report to the Agency of Education on August 22, 2022.

This addendum will serve to address the questions and provide clarification being sought by the school's administrator and governance board members in their response to the independent school team's site review visit report. It will also provide an update to the State Board of Education Independent School Approval Review Committee and the State Board of Education relevant to the initial site review.

Note: the information provided below is presented in the order and under the SBE rules in which ESBR provided their response.

Independent School Post-Review Program Updates

State Board of Education Rule 2225.2, 2225.5

All the State Board of Education rules for general education independent schools are in section 2200. The application introduction includes a reference to SBE Rule 2200. The application contains section headers listing citations for statute and SBE Rules as applicable.

The draft SBE rules were adopted on May 10, 2022. The rulemaking process was followed which included a public comment period and publishing. The review team discussed the SBE rule changes during the exit interview.

School Philosophy & Objectives

16 V.S.A. §166(b)(4), State Board of Education Rule 2225.3

The report stated that Black River High School closed in 2018. AOE acknowledges the school closed in June of 2020.

The agency's Independent School team requested to meet with the core subject area instructors. This is consistent with how all onsite visits are conducted to determine if the school meets the minimum course of study requirements. It was not necessary to meet with all instructors at ESBR.

One of the individuals interviewed referred to herself as a "life coach"; hence that is how it was written in the school's draft report.

AOE acknowledges that ESBR's math instructor is not referred to as volunteer, but rather as providing pro-bono services.

Enrollment

During the exit interview, the ESBR's head of school communicated to the agency's Independent School team that ESBR was seeking approval for a maximum enrollment of 40 students. The review team included this information received during the onsite visit as part of the visit report.

AOE acknowledges that ESBR will be open for 175 days per school year.

The review visit is a "point and time" review of the school's compliance. At the time of the onsite visit, the AOE review team was only able to verify that two of the 16 student files contained immunization records. The head of school was unable to verify on the day of the visit that all records were available but mentioned she had more that had not been filed. AOE acknowledges that ESBR stated that now all the student files are up to date. AOE is unable to verify this.

As part of a standard onsite visit the agency's Independent School team reviews service plans to determine if the minimum course of study is age and ability appropriate. Service plans were not included in student files. The team was informed by ESBR that the service plans were maintained in a binder separate from student files; however, the Independent School team was not presented with access to this binder.

At the exit interview, after hearing ESBR's intent to change its admission procedures, the Independent School team members pointed out changes in Act 173 and SBE Rules Series 2200 regarding having two types of approved independent schools. Those schools that do not accept all students may not be able to receive public tuition funding.

<https://legislature.vermont.gov/Documents/2018/Docs/ACTS/ACT173/ACT173%20As%20Enacted.pdf>

<https://education.vermont.gov/sites/aoe/files/documents/SBE%20Rule%202200%20Adopted%20Rule%20Filing-2022.pdf>

Minimum Course of Study

16 V.S.A. §166(b), State Board of Education Rule 2225.5

ESBR's instructors were unable to align their classroom instruction with the school's stated philosophy and objectives.

ESBR scheduled time for the agency's Independent School team to meet with all "staff." Per standard review protocol, the agency's team only interviews available core subject teachers. Core subject staff are interviewed to determine how and if the school meets the minimum course of study requirements.

The Independent School team did seek information on compulsory attendance but does not consider the method(s) of instruction to address this statutory requirement or SBE rule 2226.9-maintenance of attendance.

The report included the professional observation of the delivery of instruction and methods used during a live classroom. The Agency's review team could not determine the amount of in-person instruction time provided directly to students in the STEM classroom daily and weekly. Additionally, lesson plans are a tool that the reviewers use to determine compliance with other rules as a method of evidence to ensure Minimum Course of Study requirements are met. SBE Rules: 2225.8, 2225.8.1 and 2225.8.2

SBE Rule 2225.8.3 requires that the applicant provide a list of staff, instructors, and length of service.

At the time of review, the AOE review team was neither able to find evidence of identified learning goals by student grade nor documentation of proficiency-based student evaluations in compliance with SBE Rule 2229.8 relevant to Minimum Course of Study. ESBR has stated that they will adopt Empower Learning as a strategy to address these issues; but until then, ESBR needs to have a track student learning goals by grade and proficiency-based student evaluations.

Mt. Holly's director of special education forwarded service delivery plans to ESBR for four students.

ESBR's pro bono math instructor indicated that she has not met with and does not collaborate with Mt. Holly's special education service provider for purposes of accommodating curriculum for IEP/504 Plan students. Furthermore, the math instructor said assistance in math instruction is provided by a 19-year-old volunteer.

A part time reading specialist at ESBR provides nine hours of literary skill support per week. Services are provided through small, intensive need groups determined by common student needs in literacy skill development.

No in-person literacy support is provided by the school's literary specialist with the exception of the four students on service plans from Two Rivers Supervisory Union, who receive supplemental services from a TRSU special educator employee.

ESBR's instructional staff are either paid part-time employees or pro-bono independent contractors.

Professional Staff

State Board of Education Rule 2225.8

ESBR's instructional staff are either paid part-time employees or pro-bono independent contractors. Math instruction is provided by a pro-bono independent contractor. Additionally, high interest activities are provided by part time, paid community members in the areas of languages, performing arts, fine arts, and arts & crafts.

ESBR staff interviewed by the agency's Independent School team indicated that they neither participate in nor have a plan for minimum required professional development required under SBE Rules 2227.5.1 and 2227.6.

At the time of AOE team visit, the head of school confirmed that student progress conversations were not currently documented. Given the current lack of documentation for formal curriculum, lesson plans and evaluation of student progress, it is unclear how ESBR will help students meet graduation requirements.

SBE Rule 2227.7 (under the new rules) does not define sufficient. One total FTE for all core content areas is of concern to the review team.

Health and Safety Safeguards:

Mandatory Reporting Policy

At the time of the team visit, ESBR did not have a published mandatory reporting policy. Additionally, the review team provided technical assistance on the importance of publishing such a policy. The administrator said she is the only full-time staff; she stated staff means full-time employees.

At the time of the visit, some current instructors had not completed a fingerprint supported criminal record check or been checked through the child/adult abuse registry.

The administrator said 11 out of the 18 families devote time as instructors or provide general supervision. It is unknown whether these family members are required to complete a criminal record check or been checked through the child/adult abuse registry.

At the time of ESBR's site review, no formal plans or policies were published to address crisis management for fire, active shooter, or shelter in place drills.

While ESBR has created a Positive Learning Agreement that is shared with the school community, there was not a comprehensive discipline plan that indicates the school's

compliance with 16 V.S.A. § 1161a. The Positive Learning Agreement does not address the components of the statute.

<https://legislature.vermont.gov/statutes/section/16/025/01161A>

ESBR needs to adopt the Agency's model policy on hazing, harassment, and bullying or create one of its own. If the school chooses the latter option, the one created by the school must be more stringent than the Agency's model policy. This will be determined by the Agency's general counsel.

<https://education.vermont.gov/documents/healthy-safe-schools-hhb-model->

<https://education.vermont.gov/sites/aoe/files/documents/edu-healthy-safe-schools-hhb-model-procedures.docx>

Facilities:

After the visit was completed and the report was submitted, ESBR developed a corrective action plan to remediate the violations. The AOE cannot confirm which violations have been fully addressed or when all will be remediated.

Financials:

The agency's Independent School team is concerned whether ESBR has the financial capacity to remain viable. ESBR is entering its third year operating as a recognized school, and the school continues to be 100% philanthropically funded. ESBR is "calculating" how many enrollees would come from the choice towns and using this as the basis of determining if it will be financially viable upon approval, when the public funding can follow the student. The agency's Independent School team explained to the head of school and the two governance board members in the exit interview that not all approved schools will be able to receive public funding after July 1, 2023.

Post-Site Review Interventions

The head of school requested technical assistance from the agency's Independent School team to develop an efficient and effective remedy to mediate deficiencies identified during the site review on March 30, 2021. The Agency's independent school team has reached out on numerous occasions to provide information on the requirements for an independent school to be considered for approval through the State Board of Education.

Note: The process of preparing the draft visit report and submitting it to ESBR for its consideration and response was delayed due to the time lag in obtaining the Certificate of Occupancy (CO).

Recommendation:

The Independent School review team cannot recommend initial approval, at this time, for the Expeditionary School at Black River due to identified deficiencies in the school's program. Program deficiencies have been confirmed in the following areas: Minimum Course of Study 2225.5, Title 16 §906, 2228.1, Mandatory Reporting Procedures 16 V.S.A. § 251-260, School Discipline Policy 16 V.S.A. § 1161a, Health and Safety requirements 2225.7, Professional Staff requirements 2225.8.2. The review team also questions whether ESBR has the financial capacity to remain viable.