

AGENCY OF EDUCATION
Barre, Vermont

TEAM: School Finance

ITEM: Will the State Board of Education grant general and special education independent school approval to serve students in grades 7-12, within the disability areas of Autism Spectrum Disorder (ASD), Emotional Disturbance (ED), Other Health Impairment (OHI), Orthopedic Impairment (OI), Speech or Language Impairment (SLI), and Specific Learning Disability (SLD) to Compass School in Westminster Station, VT with the following two conditions:

1. That the school furnish to the Secretary its financial statements as of 30 June 2020, so that actual results for the 2019-20 school year may be considered in relation to the School's financial capacity for the near future; and
2. That the school engage an independent certified public accountant to perform on an annual basis a financial statement review in accordance with AICPA standards, furnishing to the Secretary no later than 30 December 2019 a copy of the signed engagement letter for such review for the year ending 30 June 2020?

SECRETARY'S RECOMMENDED ACTION:

That the State Board of Education grants general and special education independent school approval to serve students in grades 7-12, within the disability areas of Autism Spectrum Disorder (ASD), Emotional Disturbance (ED), Other Health Impairment (OHI), Orthopedic Impairment (OI), Speech or Language Impairment (SLI), and Specific Learning Disability (SLD) to Compass School in Westminster Station, VT for a term through June 30, 2024 with the following two conditions:

- 1. That the school furnish to the Secretary its financial statements as of 30 June 2020, so that actual results for the 2019-20 school year may be considered in relation to the School's financial capacity for the near future; and**
- 2. That the school engage an independent certified public accountant to perform on an annual basis a financial statement review in accordance with AICPA standards, furnishing to the Secretary no later than 30 December 2019 a copy of the signed engagement letter for such review for the year ending 30 June 2020; and**

This approval is conditional on the requirement that the school reports to the Agency of Education within five business days whenever any changes occur in enrollment, programs, policies, facilities, financial capacity, staffing or administration during the approval period.

STATUTORY AUTHORITY: Title 16 V.S.A., Section 166 (b)
State Board Rule: 2228 et. seq.

BACKGROUND INFORMATION:

1. An independent school may operate and provide elementary or secondary education if it is either approved or recognized by the State Board of Education.
2. The State Board of Education shall approve an independent school if it substantially complies with the Board's rules for independent schools, promulgated as Series 2200 (Independent School Program Approval).
3. Compass School seeking renewal of approval to serve students in the disability areas of Autism Spectrum Disorder (ASD), Other Health Impairment (OHI), and Specific Learning Disability (SLD). Compass is also requesting the following special education categories: Emotional Disturbance (ED), Orthopedic Impairment (OI), and Speech or Language Impairment (SLI).
4. Upon receiving Compass School's applications, the Secretary appointed a review committee to visit the school and make a recommendation as required by SBE Rule 2222. Because Compass School was seeking renewal of approval to provide both general education and special education services, the recommendation consists of two separate reports.

FISCAL IMPLICATIONS: none

STAFF AVAILABLE:

Cassandra Ryan, Fiscal and Regulatory Compliance Coordinator

1. The school's educational philosophy is to inspire and educate students to gain the knowledge, skills, and personal qualities essential to pursuing their dreams and having a positive impact on the world. Compass School offers a middle and high school program that balances depth of understanding and breadth of coverage, is responsive to student needs, and involves actively in the learning process.
2. The State Board of Education last granted independent school approval to Compass School on September 15, 2015 through June 30, 2019.
3. Compass School was visited on behalf of the Commissioner by Brian Morgan on May 10, 2019.
4. The school occupies an 18,000 sq. ft. building that used to be an Elks Club. It includes 10 classrooms, three offices, a music room, a computer lab, an art lab, a student support services room and several break out spaces for individual or small group work. Classrooms are spacious (500 - 750 sq. ft.) with average class size of 14-16. There is also storage space in the basement that is fire safety approved. The basement also houses the heating system, computer networking equipment, a costume closet, storage space, and a building supplies closet. The main ballroom (approx. 6,000 sq. ft.) has space for all-school meeting, a student lounge area, cafeteria, and a small library. This large space is also used for class projects. The school also includes a commercial kitchen that is used for the school lunch and breakfast program, as well as for exploratory, health, cooking, and nutrition classes. Outdoor spaces are dedicated to a vegetable and fruit garden, a flower garden, a rock garden, a small soccer field, a basketball court, and other recreational spaces. A copy of the Certificate of Occupancy (CO) issued by the Division of Fire Safety (DFS) is on file at the school.
The facility meets all state and federal health and safety regulations and is handicapped accessible with the exception of the basement. Indeed, there is currently one student who is wheelchair bound.
5. The minimum course of study, as prescribed in §906, is provided and adapted to the age and abilities of the students. The core course blocks are at the heart of the school's academic program. All students are enrolled on one Humanities and one Science and Technology Main Lesson block throughout the year. Core course time is designed to have students learn the essential concepts and skills in the traditional academic subject areas by investigating real world examples and engaging in "hands-on, minds-on" application of learning. Through the organization of core courses, Compass seeks to develop independent learners able to pose questions, solve problems, and apply the tools and ideas of a variety of disciplines to understand and make a difference in the world around them. A balance of "teacher directed" and teacher supported "student centered" time is structured to help students develop as independent learners. As a general guideline, the percentage of student-centered time increases with the maturity and age of the students.

Mathematics. While math is incorporated within other core courses at various times, developing math skills involves a degree of concentrated study. Each student is enrolled in a math class that meets four times weekly for 55 minutes each session. Following national and state standards from

the Vermont Framework for Learning and the Common Core, math skills are developed through traditional and nontraditional approaches.

Humanities: Humanities follow what was the Vermont Framework of Standards and more recent AOE graduation proficiencies and includes history, geography, psychology, literature, economics and aspects of architecture, music, and art. English skills focus on written, verbal, and visual communication, and the study of a range of genres in literature, correlating with the social science focus when possible. Students in the middle school study Ancient Civilizations, Vermont history and current events, and the basis of American founding documents. In grades 9-10, the focus is on the United States and its Relationship with the World. Topics include Founding Principles, Colonization and Independence, Foundations of Government, Expansion, Civil War, Reform Movements, International Engagement, Civil Rights and Social Justice, Economic Expansion, and the U.S. as Superpower. In grades 11-12, the focus is on Passages to the World Beyond. Students look beyond their own borders and focus on learning about people and places around the world in different eras.

Phys. Ed. and Health. The school focuses on health and wellness throughout the year. Health classes are organized around quarter-long strands, some of which are required by state curriculum guidelines, and others that are choices. Options include: FlexFit Gym, Mindfulness, Yoga, Zumba, Substance USE Prevention, Cooking/Nutrition, Walking and Stress Reduction. Students are required to take classes on sex education, mental health, and substance use prevention every two years. All students are expected to participate in some form of physical activity throughout the year. Both competitive and non-competitive athletic activities are available. Compass has a partnership agreement with Bellows Falls Union High School, whereby Compass high school students are eligible to play on some BFUHS athletic team.

Science. The science curriculum is centered on the goals of the Next Generation Science Standards, along with the recent Vermont proficiencies. The curriculum is organized in two-year cycles: grades 7-8; grades 9-10; and grades 11-12. Subjects include Environmental Science, Biology, Chemistry, Physics, Earth and Space Science, and are taught through an integrated approach applying math and technology as appropriate.

Fine Arts. All Compass students are expected to complete at least two credits of art exploratory throughout the year or be part of an art ELO (Extended Learning Opportunity) for one semester.

6. The school has the resources including financial capacity and qualified staff to meet its objectives. In the twenty years since its founding Compass School has enjoyed financial surpluses every year but one, which occurred over a decade ago, and the school is on track to finish the current school year with a modest surplus. The school's financials project an institution that is fiscally responsible and financially sound.
In addition to the Director, the school staff consists of 9 teachers, a Director of Support Services, a 1:1 para-educator, a part-time college counselor, and a school counselor. Every member of the staff wears a variety of hats in the school's operation, and tenure at Compass varies from one year to nineteen years. The staff is a skilled and very qualified body.

7. The health, safety, attendance, and assessment records are in good order. Fire drill and evacuation drill records are also in good order.
8. The school maintains an operating schedule that includes a total number of instructional hours each year that is not less than that required of a public school serving the same grades.
9. The school has a policy on prevention and reporting of harassment, hazing, and bullying that is as stringent as the Agency's model policy.
10. The school maintains comprehensive policy handbooks that are reviewed regularly and amended as necessary.

Summary and Recommendation: Compass School is an unusual school, founded 20 years ago as a progressive alternative for youngsters who did not succeed in area public schools. In the beginning it embraced the principles of Ted Sizer's Coalition of Essential Schools and soon supplied many presenters at Coalition conferences. Since the demise of the Coalition, Compass has continued its progressive program and has enabled students to explore a whole range of proficiencies and skills, thereby enabling students to take ownership of their learning.

I recommend renewal for Independent School Approval for five (5) years.

Respectfully submitted,

Brian Morgan

Independent School Special Education Review Report

REPORT
July 22, 2019

Compass School

**Submitted by
Special Education Review Team**



Approval Recommendation

Five-year approval in the disability categories of; autism spectrum disorder (ASD), specific learning disability (SLD), other health impairment (OHI), emotional disturbance (ED), orthopedic impairment (OI), and speech or language impairment (SLI).

Note on Approval:

The AOE recommends that Compass School ensure implementation of the following prior to its next review:

- a) Consistent ongoing documentation system to confirm delivery of all IEP services, including case management services. The documentation system for all services should include;
 - a. Name of student
 - b. Specific service provided
 - c. Service provider
 - d. Date of service
 - e. Time/length of service
- b) Review staff licensure status annually to ensure a licensed special educator is on staff and able to provide the special education services outlined in student Individualized Education Programs (IEPs).

Rationale

On the date of the visit (5/30/19) Compass's data and documentation system was unable to confirm the delivery of all special education services through the provision of student schedules. Those schedules were missing student specific details, as well as provider information, particularly special educator time. These gaps did not allow the confirmation of services. Based on post-visit submissions (dated 6/14/19) from Compass, the Agency of Education finds that the submitted documentation alleviates the documentation concerns and therefore issue a five-year approval for Compass. The Agency will review in five years to ensure these recommendations are still in place.

The initial application included requests for approval in autism spectrum disorder (ASD), specific learning disability (SLD), and other health impairment (OHI). On July 8th the Agency of Education received an amendment asking for addition approvals in the areas of, emotional disturbance (ED), orthopedic impairment (OI), and speech or language impairment (SLI).

School Description

Compass School is located in Westminster Station, Vermont. Compass has 71 enrolled middle and high school students, five eligible for services pursuant to an IEP. Currently Compass is approved to service the disability categories of autism spectrum disorder (ASD), specific learning disability (SLD), other health impairment (OHI), emotional disturbance (ED), orthopedic impairment (OI), and speech or language impairment (SLI).

Review Description

During the visit the Agency employees interviewed staff, toured facilities, observed staff/student interactions and reviewed student files and IEPs. Comprehensive file reviews were conducted for five Vermont students. The students reviewed qualified under the disability categories of other health impairment and specific learning disability.

Review Findings

2228.2 - Compass demonstrated the policies, procedures, staff training and resources to support students in the disability categories of; autism spectrum disorder (ASD), specific learning disability (SLD), other health impairment (OHI), emotional disturbance (ED), orthopedic impairment (OI), and speech or language impairment (SLI).

2228.3 - Compass demonstrated that they have written policies and/or procedures in the areas of: (1) admissions, (2) least restrictive environment, (3) discipline, (4) graduation, (5) faculty qualifications, and (6) faculty-student ratios.

2228.3.1 – Compass demonstrated evidence of minimum maintenance of (1) educational records, and coordination with LEA and parents through data and file review, (2) participation in evaluation and IEP procedures through IEP review, (3) implementation of IEPs through file review and progress reporting.

Note on Evidence

At the time of the review, Compass did not provide a system that would allow the confirmation of IEP service delivery. Supplementary materials provided (6/14/19) documentation for the services present on reviewed IEPs and letters of intent to all LEAs indicating meetings to review all listed services for appropriateness and accuracy.

2228.3.2 - Compass meets expectations regarding licensed staff. On the date of visit, the special education teacher was licensed by the Agency of Education.

2228.4 - The Compass School demonstrated policies, procedures, and written agreements outlining tuition and establishment of the division of legal responsibilities with regards to students on IEPs.

Questions: Contact Chris Kane at chris.kane@vermont.gov