

AGENCY OF EDUCATION
Montpelier, Vermont

TEAM: School Finance

ITEM: Will the State Board of Education grant initial general and special education independent school approval to serve students in grades K-12 within the disability categories of Intellectual Disability, Specific Learning Disability, Emotional Disturbance, Autism Spectrum Disorder, Speech or Language Impairment, Developmental Delay and Other Health Impairment, to **Priority Placements, Inc.** in Brattleboro, VT?

SECRETARY'S RECOMMENDED ACTION:

That the State Board of Education grant initial general and special education independent school approval to serve students in grades K-12 within the disability categories of Intellectual Disability, Specific Learning Disability, Emotional Disturbance, Autism Spectrum Disorder, Speech or Language Impairment, Developmental Delay and Other Health Impairment, to Priority Placements, Inc. in Brattleboro, VT, for a term through June 30, 2021.

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 approved by the State Board of Education.
2. The State Board of Education shall approve an independent school if it substantially complies with the State Board's Rules for independent schools, promulgated as Series 2200 (Independent School Program Approval). Only independent schools that are approved by the SBE may receive public tuition dollars.

3. Priority Placements, Inc. is seeking initial general and special education approval in the disability areas of Autism Spectrum Disorder (ASD), Developmental Delay (DD), Emotional Disturbance (ED), Intellectual Disability (ID), Other Health Impairment (OHI), Specific Learning Disability (SLD), and Speech or Language Impairment (SLI).
4. On behalf of the Secretary of Education, J. Deborah Ormsbee, Pat Pallas Gray, and Tracy Harris visited Priority Placements, Inc. in August 2019.
5. Priority Placements, Inc., for the last 20 years, has operated a business which provides tutorial services to area students, many of whom are enrolled in the local public schools.
6. The Board may grant initial approval for a period of not more than two years (SBE rule 2227).

FISCAL IMPLICATIONS: none

STAFF AVAILABLE:

J. Deborah Ormsbee, Independent School Review Coordinator

Independent School Review Report

General Education & Special Education

REPORT

August 20,
2019- Gen Ed
Review

August 29,
2019 Special
Education
Review

Priority Placements, Inc.

Submitted by

Independent School Review Team Members:

General Education Representatives:

J. Deborah Ormsbee & Pat Pallas-Gray

Special Education Representative:

Tracy Harris



GENERAL EDUCATION:

Independent School Application

SBE Rule 2226.1

The description provided by Priority Placements, Inc. in the general and special education applications were accurate.

School Philosophy & Educational Objectives

SBE Rule 2225.2, 2225.5

The general education review team met with Priority Placements, Inc. staff on Tuesday, August 20, 2019. Interviews were conducted at two sites in Brattleboro and encompassed programing for grades K-12. Personnel present for interviews were the owner of the educational business, program director, six classroom teachers, the licensed special educator and the therapeutic services specialist.

Interviews revealed, consistently across each staffing area, that program philosophy and stated educational objectives will remain the same, if granted approval to operate as an independent school "... the purpose... is to provide safe, positive and predictable outcomes to distressed children and adolescents in need of an educational placement in the Windham County catchment area... [who are] unable to access education."¹

Agency staff were able to confirm evidence of stated educational objectives which included: differentiated instruction, project-based learning, Common Core curriculum, and utilization of Multi-Tiered Systems of Support. Imbedded in all areas of learning are trauma informed and social emotional practices that provide additional support to close student achievement gaps. Staff consistently communicated that a primary objective for students is to access programing that will foster a successful transition back to a mainstream public education setting after obtaining appropriate emotional supports and academic skill development.

Priority Placements, Inc. will also offer educational opportunities in life skills, physical education, the arts, and for older students, employability and personal economic skill development. Staff provide students with opportunities to develop flexible individualized learning plans that utilize authentic assessments integrating, social emotional and self-regulation with educational achievement.

¹*Approved Independent School: General Education Application and special education application. Submitted to the Agency of Education, May 17, 2019.*

Independent School Site Review Notes: Agency of Education, J. Deborah Ormsbee & Pat Pallas-Gray, August 20, 2019.

School Enrollment

SBE Rule 2225.3

16 V.S.A. §166(b)(4)

Agency review of intake documentation in conjunction with staff interviews, confirmed that student enrollment is completed in compliance with SBE Rules and 16 V.S.A. §166 (b) (4). Once approved, Priority Placements, Inc. will become a school-year program and will serve up to fourteen children/youth at each site.

After review of all appropriate student documentation (including but not limited to: IEPs, behavior plans, attendance records, guidance counselor documentation, parent and family notifications and achievement progress reports) an official enrollment team is assigned to interview parents, students and LEA staff, as indicated. Priority Placements' enrollment teams include: the executive director, the program director, the special educator (for students on IEPs) and other personnel deemed essential, based upon referred student's identified areas of need.

After the formal process has been completed, a determination is made based upon two predominate but equally important enrollment criteria: 1. Priority Placements' ability to provide required services with fidelity and 2. A student's ability to demonstrate readiness to successfully access educational supports and engage in school activities in a safe and consistent manner.

A thorough system for securing enrollment documentation exists to ensure confidentiality of referred student and family information. Additionally, student records comply with special education requirements for on-site storage, limiting personnel access to per-need basis and aligned with parent and family notification requirements.

2226.9 The school maintains a register of the daily attendance of each of its pupils and meets the requirements of law regarding the reporting of its enrollment.

Governance

<i>SBE Rule 2225.4</i>

Currently, Priority Placements, Inc. provides contracted services to surrounding LEAs. Both locations of the program are managed by the same leadership team that ensures comparable services.

Priority Placements, Inc. is a Vermont domestic profit corporation governed by a four-person Board of Directors. Both sites, including all staff and students, are overseen by a small management team. The Executive Director is responsible for the overall legal, regulatory, financial and programmatic functions of Priority Placements, Inc. She works in conjunction with the Governing Board comprised of unpaid professional members who are well aware of the purposes and principles of the company and who are able to support the continuation and well-being of the business. Legal services, if needed are provided by Thomas Costello, Esq. of Costello, Valente & Gentry, PC, in Brattleboro. Bookkeeping functions, including payroll and tax compliance responsibilities, are managed by D'Alessio and Associates, Inc. of Keene, NH; accounting services, including tax return preparation is provided by Nathan Alexander, CPA of Keene, NH. Sarah Newman, who is the Program Director, is in the process of becoming the Executive Director and owner of the company. The anticipated date of the transition is January of 2021.

Priority Placement staff meet regularly to review programing, engage in staff supervision and review student progress towards meeting academic achievement and social emotional coping skills. The owners of Priority Placements engage in regularly scheduled meetings to review fiscal concerns that include: educational supplies, staff training, operational program costs, transportation and maintenance of the facilities.

Minimum Course of Study & Required Assessments	<i>SBE Rule 2225.5 16 V.S.A. §906</i>
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2226.2 The course of study offered is adequate to meet the educational purposes of the school and to provide a minimum course of study that is age and ability appropriate.

2226.3 The school has available support services necessary to meet the requirements of a minimum course of study and its educational purposes.

Priority Placements' over-arching K–12 minimum course of study, is based upon Common Core State Standards, the Vermont Framework of Standards, and alignment with MTSS. Moreover, staff utilize effective, evidence-based best practice instructional materials, curriculums and assessments as identified by Johns Hopkins University as effective for student achievement.

Each member of the staff interviewed, were able to articulate processes for adapting curriculum to meet individualized student IEP goals and social/emotional objectives. Staff members provided, during Agency of Education interviews, examples of project-based work, and assessments regularly included in student individualized learning plans. There is a formalized plan in place for implementing and supporting state assessments for all publicly-funded students.

Other program required courses and curriculum have been developed to expand student learning to ensure life skills development, some of which include: physical education, nutrition, health and wellness (drug, tobacco and alcohol awareness), the arts and art history.

2226.10 The school maintains an operating schedule that includes a total number of instructional hours each year which is not less than that required of a public school serving the same grades.

Instructional and support staff employ a variety of techniques for delivery of educational services including peer-tutoring, individualized student practice, one-on-one direct instruction and group work. Interviewed staff members indicated that current program practices utilize community partners to enrich and support life, job and social skills curriculums and to ensure integration of authentic assessment opportunities.

Professional Staff	<i>SBE Rule 2225.8, 2226.5</i>
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2226.5 The school employs professional staff who are qualified by training and experience in the areas in which they are assigned.

Program staff includes two early childhood/elementary educators, an English/social studies teacher, a teacher for mathematics, science and social studies. There are also two local retired teachers available, if needed, throughout the school year. Additionally, a licensed special educator will provide direct services and staff supervision at both program sites and all students will have access to the licensed Speech and Language Pathologist. All members of the staff engage in annual professional development, are enrolled in graduate school proactively completing on-line programs, and partake in state-wide or locally offered professional development.

It is an expectation of the business owners that all staff remain current with either professional licensure or continue professional knowledge in their service area. In addition to supporting external professional development opportunities, owners provide whole-staff training on relevant subjects including, but not limited to: special education, trauma informed classroom management techniques, core curriculum development and assessment implementation.

2226.6 The school has an adequate program of continuing professional staff development as demonstrated in the application.

Staff curriculum vitae and professional development records are up-to-date and readily available for review. All staff files contain copies of annual evaluations which incorporate goal-setting, identified areas in need of improvement, a list of staff strengths and professional achievements.

Facilities

<i>SBE Rule 2225.6</i>

2226.4 The school has classroom and other facilities necessary to operate its program.

Priority Placement will offer two sites for students. In a quiet neighborhood in downtown Brattleboro, the program owners have completed renovations to a traditional stick-built structure. The second program is located in strip mall in West Brattleboro and has been completely renovated to accommodate the needs of all students and complies with SBE Rules, zoning and State occupancy standards.

Much time and attention have been devoted to creating the learning environments at both sites (West Brattleboro and Brattleboro). Classrooms and support facilities, including bathrooms, are clean and in good repair. All classrooms and learning spaces are soothing, welcoming and facilitate implementation of trauma informed practices.

Owners of the facility in Brattleboro have installed, at the business's expense, automatic sprinkler systems and updated all fire equipment and safety exits. The Division of Fire Safety have worked with the business to inspect and provide technical assistance regarding compliance with all regulations and best practice in fire prevention, and certificates of

occupancy are being provided to the Agency of Education.

Handicap accessible equipment will either be constructed or purchased to ensure prompt, safe evacuations of students and staff at the Brattleboro site. The West Brattleboro site is handicap accessible and complies with the American Disabilities Act (ADA).

Kitchen spaces that serve dual purposes for learning activities or meal preparations are compliant with all Health Department requirements. Cooking utensils have been secured to guard against unsupervised, unauthorized student access.

Health & Safety	<i>SBE Rule 2226.8</i>
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2226.8 The school satisfied lawful requirements relative to its facilities, fire drills, and the immunization of its pupils against disease.

Emergency Services:

Each month all occupants of the building practice fire and emergency safety evacuation protocols. A plan is in place to work with Brattleboro Police Department to develop lock-down and shelter in place protocols that will be implemented, September 2019.

All staff members are trained annually in CPR and First Aid with specific emphasis on immediate response to student crisis and injury, as well as, regular medical interventions. Proper protocols are in place for ensuring compliance with blood borne pathogen and disposal of sharps.

Parents, guardians or custodial adults will be informed of health, medical and program safety protocols, procedures and annually provided with a copy of all program policies.

Nursing Services and Medications:

Priority Placements, Inc. does not currently employ a nurse or provide visiting nursing services for students. Designated staff members are trained in proper dispensing of student medications, logging of information and a secure, locked medicine cabinet is in place at both program locations. Student immunization records are contained in a secure, confidential locked filing system.

Staffing Safeguards:

Background checks are conducted prior to start date for all newly hired employees. Finger-print supported criminal record checks and Vermont Adult/child Abuse registries are checked annually, and both reports are contained in a confidential filing system available for review upon request.

Priority Placements, Inc. has developed strong anti-bullying, anti-hazing and anti-harassment policies and corresponding procedures that will be annually reviewed by staff during in-service each August. Additionally, strategies for implementation with future students will be a part of

The future program's curriculum.

Student Behaviors and Staff Expectations:
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<i>16 V.S.A. § 1161a</i>

All staff receive professional development that ensures proper management of student educational spaces and staff offices. Therapeutic Crisis Intervention programming is offered, on-site by a certified professional, to all staff during each August in-service. Moreover, current safety programs offered include proper implementation of restraint and seclusion best practices.

Program administrators have put forth great effort in creating a welcoming, soothing student and family centered educational environment. At both the Brattleboro and West Brattleboro sites a set of well-established, and a thoroughly-articulated set of expectations regarding personal conduct and safety are visible for staff, students and program visitors. To date, student's behaviors have not required the use of extreme environmental management techniques requiring either suspension or expulsion. Parents or custodial family members are provided with a copy of entire program manual at the beginning of each school year.

All staff members are trained annually and have a thorough understanding of the program's strength-based approach toward discipline of children and youth who have varying degrees of adverse childhood experiences, and complex trauma. All training is completed taking into consideration IEPs and personal learning plans objectives.

2226.7 The school employs a sufficient number of professional staff for the population served.

Financial & Capacity

<i>SBE Rule 2225.9</i>

2226.11 The school has the financial capacity to carry out its educational purposes for the period of approval.

Priority Placements, Inc. has submitted to the Agency of Education all required fiscal documentation. Sufficient funds are available to meet educational programmatic needs, staff salaries, benefits and general operational costs of both facilities, FY20.

An accredited, external service provider has been contracted to perform payroll services for all employees, file taxes and provide annual reviews or audits as needed. Financial projections indicate continued program solvency and ability to meet typical annual increases in program operational costs. Finally, sufficient cash-on-hand will meet demands of an expanded program should the State Board grant approval as an independent school. The owners of Priority Placements, Inc. will apply to the Agency of Education, post approval, to obtain special education tuition rate, FY20.

Special Education Report

Approval Recommendation

The Agency of Education special education review team recommends a two-year initial approval in the areas of autism spectrum disorder, developmental delay, emotional disturbance, intellectual disability, other health impairment, specific learning disability, and speech or language impairment.

School Description

Priority Placements, Inc. will be accepting students in grades K-12 with the disability categories identified above. The school is currently serving both special education and non-special education students, with a 50% mix of both. Students in grades K-6 are placed at the Marlboro Road Campus while students in grades 7-12 attend the 88 High Street campus, with both campuses managed by the same leadership team. The school maintains a small student census, with a faculty to student ratio of 1:4 at most, but with 1:2 or 1:3 being more typical. This low ratio allows staff members to work intensely to meet the individual needs of each student and to attain their mission of providing safe, positive, and predictable outcomes for their students.

Review Description

A Vermont Agency of Education special education team member visited Priority Placements, Inc. located in Brattleboro, Vermont, on August 29, 2019. An initial interview was held with the leadership team of Sarah Newman, Leslie Todd, and Evan McNamara, followed by individual interviews with Timothy Caruso, Special Educator; David King, Therapeutic Services Specialist; and General Educators Kristy Garvey, Betty Leno, and James Allanach. The school also has a part-time Speech-Language Pathologist (SLP), who wasn't on site that day and therefore not interviewed. The SLP consults with the staff at Priority Placements, Inc. as needed regarding the language needs of students who require support in that area. A collaborative relationship exists with the students' sending schools that allows for direct services in speech and language to be delivered, as called for in a student's IEP, from the LEA's SLP.

All staff members interviewed conveyed similar responses related to delivery of special education services, knowing what each student's IEP was targeting, understanding their role in terms of accommodations and modifications, evaluating progress, and getting ample support from Mr. Caruso, the special educator. Likewise, all staff members showed a deep understanding of how to meet the needs of students coping with social, emotional, and behavioral challenges. Trauma-informed mindsets and practices were evident in these conversations, as was an emphasis on evidence-based and positive behavior interventions. The unity with which faculty members spoke, albeit in individual interviews, is evident of a culture of consistency and predictability. All staff members were "on the same page" in terms of what the overarching goals of the program were and how to address individual needs.

The school has a very concrete system for documenting the delivery of IEP services as well as student progress. The special educator's schedule clearly specifies which students he'll be

working with on which days and during which time intervals. He maintains running records of each student's progress and every two weeks the special educator as well as all general education teachers submit progress notes for each student to the school's director. The leadership team also maintains daily attendance records for both students and teachers. The special educator spends time at each campus every day and his schedule allows for both direct services and consultation with teachers. One of the teachers at the elementary school campus is working toward special education licensure and the school's goal is to eventually have a special educator full time at each campus.

With regard to the admissions process, the school director takes the lead but with input from both the special educator and the therapeutic services specialist. The team from Priority Placements, Inc. works with each student's IEP team to make placement decisions, both upon intake and discharge from the program. It was evident in all interviews that Priority Placements, Inc. works very collaboratively with the LEAs involved and maintains a strong, working relationship that involves shared responsibility for the students placed at Priority Placements, Inc. The transition process is exceptionally well planned; students are supported in their return to their public-school settings and the transition process can be paced as gradually or as quickly as each student requires. Priority Placements, Inc. has been working with LEAs for the students they serve for many years to individualize contracts for each student, parsing out special education from general education costs. Given the fact that many of their students attend both their local public schools in addition to Priority Placements, Inc., rates vary based upon how many minutes each student is placed at Priority Placements, Inc.

Behavior management is achieved at Priority Placements, Inc. by the formation of deep relationships between staff and students and by the fact that staff members are expected to maintain eyes-and-ears-on supervision of students at all times. That level of supervision allows teachers to recognize triggers and intervene early, prompting and supporting students to use proactive coping strategies before their behavior escalates. Priority Placements, Inc. does not seclude students, but they are trained to administer restraints using the Handle With Care protocol, approved by the Agency of Education. There are two trainers for Handle With Care on staff, but it was noted by all interviewed that the use of restraint was very rare. School members comply with all Rule 4500 requirements related to any restraints that do occur.

Lastly, each staff member interviewed commented favorably on the quality and quantity of support they receive. The special educator has ample time in his schedule to provide classroom teachers with consultation, co-teaching, and accommodations and modifications to their curriculum. School-wide trainings focus each year on a particular topic pertinent to their student population and they take a "deep dive" into that topic throughout the year. In addition, each staff member is supported to further their trainings in order to maintain their licensure.

Review Findings

2228.1 – Priority Placements, Inc. demonstrated the policies, procedures, and staff training to support students in the disability categories of: Autism Spectrum Disorders, Developmental Delay, Emotional Disturbance, Intellectual Disability, Other Health Impairment, Specific Learning Disability, and Speech or Language Impairment.

2228.3 –Priority Placements, Inc. has written policies and/or procedures in place 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 – Priority Placements, Inc. demonstrated clear evidence of systems in place regarding educational records, coordination with LEAs, participation in evaluation and IEP procedures, and implementation of IEPs, including the transition to less restrictive environments.

2228.3.2 – Priority Placements, Inc. meets expectations regarding licensed staff. The special education teacher is licensed by the Vermont Agency of Education.

2228.4 – Priority Placements, Inc. demonstrated that they have policies, procedures, and written agreements outlining tuition and establishment of legal responsibilities concerning students on IEPs.

Questions: Contact Tracy Harris at tracy.harris@vermont.gov