

**AGENCY OF EDUCATION
Barre, 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 5-12 within the disability categories of autism spectrum disorder, deaf/blindness, deaf/hearing loss, emotional disturbance, intellectual disability, multiple disabilities, orthopedic impairment, other health impairment, specific learning disability, speech or language impairment, traumatic brain injury, and visual impairment, to Two Roads Academy in Williston, VT?

SECRETARY'S RECOMMENDED ACTION:

That the State Board of Education grant initial and special education independent school approval, to serve students in grades 5-12 within the disability categories of autism spectrum disorder, deaf/blindness, deaf/hearing loss, emotional disturbance, intellectual disability, multiple disabilities, orthopedic impairment, other health impairment, specific learning disability, speech or language impairment, traumatic brain injury, and visual impairment, to Two Roads Academy in Williston, VT. This approval is for two years through June 30, 2020.

That the school reports to the Agency of Education within five days any changes in enrollment, programs, policies, facilities, financial capacity, staffing, or administration during the approval period.

STATUTORY AUTHORITY: Title 16 V.S.A. §166 (b)
SBE 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 Board's rules for independent schools, promulgated as Series 2200 (Independent School Program Approval). Only private schools that are approved by the SBE may receive public tuition dollars.

3. Two Roads Academy is seeking initial general education and special education approval in the following disability categories: autism spectrum disorder, deaf/blindness, deaf/hearing loss, emotional disturbance, intellectual disability, multiple disabilities, orthopedic impairment, other health impairment, specific learning disability, speech or language impairment, traumatic brain injury, and visual impairment.
4. The Secretary appointed a reviewer to visit the school and make a recommendation as required by SBE Rule 2222. An AOE staff member conducted the special education visit.
5. Steve Lorenz performed the general education review. He described the school facility as a leased space in a fairly new and modern facility with a full kitchen, therapy room, sensory room, ADA bathroom, a generous community space, small group and individual meeting rooms. All spaces are accessible with an elevator.
6. The reviewer found that the minimum course of study as required by 16 V.S.A. § 906 is provided and is well adapted to the age and abilities of the students. The curriculum and course of study is aligned with Vermont and National Standards. Each child has an individual learning plan.
7. Two Roads Academy has a policy on the prevention and reporting of harassment, hazing, and bullying which is as stringent as the Agency's model policy.

GENERAL EDUCATION REPORT

Two Roads Academy (otherwise for the purposes of this report TRA) is seeking to be an Approved Vermont Independent School for the 2018-2019 school year and beyond. TRA is primarily serving, but not limited to, students affected by trauma, anxiety, emotional disturbance, or other disabilities. The TRA philosophy is that "All students can achieve their full potential and become successful and valuable members of society". Most importantly, TRA is currently providing, and will continue to provide services, when a student's needs are not able to be met in an environment in a public school setting. Placements may be for a short or for a long term in this more structured therapeutic, evidence based learning environment. The school seeks to close gaps, and help students establish skills they need, that will bring them to a place that allows for reintegration in their school community.

In its first year, the enrollment of TRA will be between 3 – 5 students. Serving students in grades 5-12, TRA is anticipating (based on applications and inquiries from several regional school districts), that in their second and third years they will be serving 15-20 students.

The mission and description of the school is stated clearly on the TRA website and in their school brochure, school documents, policies and promotional materials and is the same as stated in the application. The mission, philosophy and educational objectives of the school were clearly articulated by staff and faculty. (Please find attached a copy of the current Two Roads Academy brochure).

The school's governance model as described in the application is accurate. TRA is a For Profit School and is a division of Green Mountain Behavior Consulting Inc. There are plans to expand the governing Board of Directors, from three to five members bringing on board members who have varying profiles that will benefit the successful operations of the school. The current board members have very strong backgrounds in school and therapeutic settings serving the types of students that TRA is enrolling.

Daily Program:

As evidenced, by my on- site visit, and in their application, the daily program and schedule is designed to meet the individual needs of students, whether it be via individualized or small group settings. A "personalized learning plan" is developed based on the student's academic, emotional and social needs, as well as his or her passions.

Daily instruction is "project and proficiency based" and informed by state and national standards including CCSS, NGSS and National Art Standards. All academic subjects are taught in an interdisciplinary project based manner built around the above-mentioned standards and "personalized learning plans".

Specifically the daily schedule includes academic studies, outdoor education, community based education, and on-site therapy.

School Site Visit (schedule included below)

This reviewer arrived at TRA at 7:45am and remained until 12:30-pm. I was greeted by the Director of TRA, Katie Palmer and was given a tour of the facility, an overview of the day and introduced to staff. I had the opportunity of sit in on their daily staff meeting. After the staff meeting, I began meeting individually with staff members, which carried on throughout most of the visit. I was able to meet with all staff except for one of the Behavior Interventionists. He was engaged with a relatively new student most of the visit.

I also had the opportunity to sit in with a student and two staff in an academic exercise/lesson/class for a significant amount of time. I only sat in on one class/tutoring session as was appropriate on this day. However, this gave me a very clear picture of an academic session.

My meetings with staff gave me the opportunity to engage with the Director of Special Education Services, the School Director, the Outdoor Education Director, the ACT Therapist, and most of the Behavior Interventionists. I finished the visit with the Director, Katie Palmer, to review policies, handbooks, paperwork and to review the AOE checklist. We also discussed my time with the other staff members and reviewed and discussed the financials. Katie prepared at my request a two year financial projection (condensed P &L) for TRA, for the 2018/19 and 2019/20 school years.

I received, post visit, the AOE requested finances from the parent company, Green Mountain Behavior Consulting Inc. These are attached as well and represent an Independent Accountants Report for 2015/2016/2017. This letter indicates a very successful and fiscally sound organization.

My visit allowed me ample time to see the philosophy of the school in action and to get a sense of the commitment to learning by the faculty and the student I was able to observe.

The Schedule for the Day (modified during the visit)

7:45: join in on our morning staff meeting.

8:00 - 8:45: Chat with available staff - together or one on one.

8:45-9:15: Enjoy time with one student (JF) and his staff

9:15 - 9:45: Enjoy time with another student (R.M.) and her staff if she is willing (she may be happier to not talk to a new person, but might be willing to have you hear from her staff and chime in).

10:00 - 12:00: touch base with Katherine (special educator), Katie and any other staff you would like to access regarding the items on the checklist.

Description of Facilities

The TRA is located in a 4000 square foot leased space in a fairly new and modern facility located within an office building and complex. The space includes a full kitchen, therapy room, sensory room, ADA bathroom, a very generous community space, small group and individual meeting rooms and office space. All spaces are accessible with an elevator serving the school as needed. The facility is more than adequate to meet the needs of the students and meets state and federal health and safety regulations.

Minimum Course of Study and Required Asset 16 V.S.A. § 906.

The minimum course of study, as prescribed in 16. V.S.A § 906, is provided and documented in the TRA application and is well adapted to the age and abilities of the students.

TRA has aligned its curriculum and course of study to Vermont and National Standards. The curriculum is designed to meet the individual needs of each student. Each child has an individual learning plan. The school has made an intentional and successful attempt at modeling its program in line with the various components of Vermont Act 77 including but not limited to: Personalized Learning, Proficiency Based Learning and Flexible Pathways.

The school's pedagogy, while reinforcing basic academic skill sets, goes beyond the teaching of the basics and core subjects. TRA's responsiveness to the individual student's learning, emotional and social needs, as well as the student's passions and strengths, is in the forefront of the schools program.

Staffing: Adequacy; Qualifications; Professional Development

The number of staff at TRA is currently eight people. This will grow as the program expands. Staffing is more than adequate at this time.

The staff, in all cases have college degrees, with several having advanced degrees. Their educational backgrounds (in their application) and resumes were available and complete. All have had prior teacher and/or therapeutic experience. My observations and interviews indicated a high level of skill and knowledge, a collaborative spirit, and deep respect for individual learning styles of each of the students at the school.

During my individual staff interviews, it became evident that professional and personal development needs are being met and are expected. These opportunities occur during certain staff meetings as well as in-service days at the beginning and end of the school year. These trainings include Applied Behavior Analysis, Acceptance and Commitment Training (TRA is one of a few if not the only school of this type using this method), continuing education around the academic program and more. Program and staff evaluation (which occur on a regular basis) includes self-reflection, and peer review in regards to the impact of new learning on student experiences, growth, and learning.

Financial Stability and Capacity

TRA has provided (and is attached) an Independent Accountants Report on the past and current fiscal health of Green Mountain Behavior Consulting Inc. (of which TRA is a division) for 2015/2016/2017 indicating net profits that will more than support the beginning growth of TRA. These combined with the two-year projections for the growth of TRA leaves no doubt in this reviewer's mind that this is a fiscally healthy organization and will continue to be so.

Student Attendance and Assessment Records. Fire Drill and Safety Records. These records were reviewed and found to be in very good order.

Operating Schedule; Number of Instructional Hours. The school maintains an operating schedule that includes a total number of 179 school days per year.

Policies: Admission, Health and Safety, Discipline, Harassment/Bullying. Review of the school's handbook and emergency and safety procedures reveal that the school has developed policies for health and safety, admission, discipline and more. The school has a policy on prevention of harassment, mandatory reporting of child abuse (as well as training) and all other policies required and desired to operate a school efficiently, effectively and safely.

School Improvement Plans:

There are no immediate plans for improvements or expansion at this time. The school currently uses community resources for off-site additional learning experiences.

Summary and Recommendation

Two Roads Academy provided an application that proved to be detailed and informative. They provided all of the information requested by the AOE in their application and during the site visit. The site visit was critical to giving me a complete picture of the current and future plans for the school.

It became apparent during the visit that this is a quality program that will provide much needed services for school districts in the region struggling to serve students, who need not only academic support, but therapeutic and alternative school settings to be successful in their school careers and in life.

Two Roads Academy is offering exactly what it states it is offering in its mission, philosophy and educational objectives: opportunity for individualized and small group learning in a developmentally appropriate, therapeutic learning environment for students whose needs cannot be met in their home schools and to facilitate and design a program for re-integration of each student so that they may return to the sending school.

TRA meets State Board rules and requirements for an Approved Vermont Independent Schools. TRA will be filling a need for many of the regional public school districts while supporting and serving students requiring these types of services. I recommend that the SBE grant initial GenEd Independent School Approval for grades 5-12 to TRA located in Williston, Vermont for a period of two years ending on a date to be determined by the SBE.

Respectfully submitted,

Steven Lorenz

Independent School Special Education Review Report

REPORT

**September 5,
2018**

TWO ROADS ACADEMY

**Submitted by
Special Education Review Team**



Approval Recommendation

Two year initial special education approval in the disability categories of: autism spectrum disorder, deaf/blindness, deaf/hearing loss, emotional disturbance, intellectual disability, multiple disabilities, orthopedic impairment, other health impaired, specific learning disability, speech or language impairment, traumatic brain injury, and visual impairment. Two Roads Academy initially applied for the category of developmental delay as well, but based on the interview conducted during the visit on July 12, 2018, the category approval request was withdrawn.

Note on Approval:

Two Roads has the staffing and expertise to support students in the above categories that are not in danger of harming themselves or others. Two Roads Academy is not recommended as a placement for students with those concerns.

In addition, the AOE recommends that Two Roads Academy implement the following prior to its next review:

- a) Consistent ongoing documentation system to confirm delivery of all IEP services. The documentation system should include;
 - a. Name of student
 - b. Service being provided
 - c. Service provider
 - d. Date of service
 - e. Time/length of service
- b) Documentation and reporting system to confirm progress on IEP goals
- c) Educational Agreement with Local Education Agency (LEA), signed and dated prior to the provision of services, that includes;
 - a. Amount of tuition
 - b. Services provided
 - c. Additional costs
 - d. Services not included and descriptions of how/if those services might be obtained alternately
 - e. Termination clause
 - f. Signature
 - g. Date of signature
- d) Non-Instructional Agreement initiated with LEA within 30 days of enrollment and provision of IEP services

Rationale

Based on the rules for Special Education Approval for Independent Schools, Two Roads Academy did not adequately meet expectations upon the visit date. The review found that data and documentation were missing to confirm future service delivery and progress reporting. Based on post-visit submissions (July 20, 2018, July 24, 2018, July 31, 20180) from Two Roads Academy, the Agency of Education finds that corrective actions made in the short term

can ameliorate the concerns and therefore issue an initial two-year approval for Two Roads Academy. The Agency will review in two years to ensure these recommendations are implemented systemically.

School Description

Two Roads Academy is seeking initial approval in the disability categories of: autism spectrum disorder, deaf, deaf/blindness, deaf/hearing loss, emotional disturbance, intellectual disability, multiple disabilities, orthopedic impairment, other health impaired, specific learning disability, speech or language impairment, traumatic brain injury, and visual impairment. Two Roads Academy is serving three students grades 7-12, all of whom are currently being served by an Individualized Education Plan (IEP). The documentation provided at the visit indicated that a placement decision had been made for those students even though Two Roads was not at that time an approved independent school.

Review Description

Two Roads Academy, located in Williston, Vermont, was visited by Agency of Education staff on July 12, 2018. According to student records, there are three Vermont students receiving special education services at this school. During the visit, Agency employees interviewed staff, toured facilities, observed staff/student interactions, and reviewed student files and IEPs. File reviews were conducted for all three (3) Vermont students. The students reviewed qualified under the disability categories of emotional disturbance, other health impaired, and autism spectrum disorder.

Review Findings

2228.1 – Two Roads Academy demonstrated the policies, procedures, and staff training to support students in the disability categories of; autism spectrum disorder, deaf, deaf/blindness, deaf/hearing loss, emotional disturbance, intellectual disability, multiple disabilities, orthopedic impairment, other health impaired, specific learning disability, speech or language impairment, traumatic brain injury, and visual impairment.

2228.3 – Two Roads Academy demonstrated 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 – Two Roads Academy did not demonstrate sufficient evidence in all of the following; minimum maintenance of (1) educational records, and coordination with LEA, (2) participation in evaluation, and IEP procedures, (3) implementation of IEPs.

Note on Evidence

Based on a review of three student files, school documentation of schedules, staffing interviews, and Non Instructional Agreements, all services listed on IEPs were unable to be confirmed, as no documentation system existed as of the time of visit (July 12, 2018). Post-visit submissions (July 20, 2018, July 24, 2018, and July 31, 2018) included a documentation system with all necessary components.

2228.3.2 – Two Roads Academy meets expectations regarding licensed staff. Special education teachers were licensed by the Agency of Education.

2228.4 – Two Roads Academy did demonstrate 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

COST IMPLICATIONS: none

VT AOE STAFF AVAILABLE:

Cassandra Ryan, Fiscal and Regulatory Compliance Coordinator



Pat Pallas-Gray
Vermont Agency of Education
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September 5, 2018

Dear Pat,

Thank you for sharing the reports from Chris Kane and Steve Lorenz's evaluations of Two Roads Academy in consideration for approval to become a Vermont Independent School.

I am very pleased that we are being recommended for a two year initial approval. Please allow me to share the following with the State Board of Education as they consider Two Roads Academy for approval.

I found no factual errors in either report.

As Chris indicated in the Special Education report, there were several items that were requested by him and Kascinda Fleming at their visit. These items are listed on page 2 of his report (items a, b, c, and d). I am pleased to report that in addition to having provided evidence of those items being put in place as of July 31, (as indicated on page 3 of his report) we are currently using each of those systems and would be happy to provide evidence not only of their existence, but also of their use at any time to the AOE or State Board of Education.

Also, as a result of our visit with Chris and Kascinda on July 12, 2018, we have engaged in deeper-level professional development for all staff regarding the IEP process and the importance of documentation of continued progress on IEP goals throughout each day (not just at progress reporting time). Our staff have a much more attuned level of commitment and awareness of the individual student goals and objectives and how to capture evidence of progress being made.

Continuing on the topic of professional development: We have increased our professional development time to twice weekly, in addition to 9 dedicated non-student days. Our topics include Acceptance and Commitment Training (our therapeutic model), Project Based Learning (in collaboration with Sam Nelson from CVSD), and Proficiency Based Grading/Vermont Act 77.

It was a pleasure to receive each of the visitors from the Agency, and we are eager to continue collaborative work both with the Agency of Education as well as our LEAs in service of our students and those who need similar services. We are also interested in any process at the Agency in which we can offer our perspective, insight or ideas to better serve students before



Two Roads Academy

their needs escalate to require services such as those offered at Two Roads Academy. We look forward to the day when our services are no longer needed.

Thank you again, Pat, for all your guidance in this past year as we worked our way through the approval application process. If anyone going through this process would like to hear our 'lessons learned', feel free to share my contact information as you feel appropriate.

Best regards,

Katie Palmer, M.Ed, BCBA
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