

**New Hampshire
Department of Education
Bureau of Special Education Support
Monitoring Review for Approval of
Private Provider Special Education
Programs**

Nashua Children's Home

**Summary Report
2022 - 2023**

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Overview of Nashua Children’s Home Educational Programs

Nashua Children’s Home, located at 125 Amherst Street, Nashua, NH, is a New Hampshire Department of Education, Bureau of Special Education Support, Approved Special Education Program and has licensures for residential facilities issued through the Department of Health and Human Services.

As an approved 180-day school year program, Nashua Children’s Home has the capacity to serve 30 students of all genders in grades one through eight. Students enrolled in this program have disabilities in the areas of Developmental Delay, Emotional Disturbance, Intellectual Disability, Other Health Impairments and Specific Learning Disability.

The mission of Nashua Children’s Home revolves around its “commitment to the care, welfare, and educational achievement of children and youth within its residential and educational programs and the successful transition to adult living in its Transitional Living Program. Nashua Children’s Home provides care and stability to boys and girls unable to remain with their families, special education services for students who have not been successful in public school settings, and supportive housing for youth that have aged-out of care.”

The educational program at Nashua Children’s Home is designed for students who struggle with behavior, academics, and social skills and have not been successful accessing education and services in a less restrictive program in their public school. Each of the three self-contained classrooms at Nashua Children’s Home has a certified special education teacher and an aide providing students with a supportive learning environment and a favorable teacher to student ratio.

Recognizing that the optimum goal for each student is the successful reintegration into the public school setting, students engage in supervised activities inside and outside the classroom to learn essential social, living, academic, and decision-making skills. As students develop and refine their skills, they can begin to deal with their environment more effectively.

Nashua Children’s Home recognizes the importance of family partnerships and the integral source of support they provide when reintroducing a student back to the public school environment. Close communication between home and school assists the family in developing skills so they can support their child when reintroduced to the public school environment and in other future endeavors.

The leadership team at Nashua Children’s Home consists of an Executive Director and an Educational Director. All students in the educational program are assigned to a Child and Family Therapist for counseling and have access to certified school counselors.

Noteworthy Practices and Areas in Need of Refinement

Noteworthy Practices

During the monitoring visit, it had been revealed that the Nashua Children's Home approved special education programs included several practices in their teaching, lessons, and expectations which are noteworthy. Such practices are listed below.

- Mutual respect between all staff and students was observed during the program visit. Staff and students shared a trusting relationship which was evident in all classrooms. Students demonstrated feelings of being in a safe and comfortable environment while participating in both academic and social curriculum.
- The recreational spaces, both inside and outside, were observed to promote positive interactions among students and staff and offer opportunities where students can relax and practice their social skills.

Areas in Need of Refinement

During the monitoring visit, it was revealed that the Nashua Children's Home approved special education programs had a couple areas in need of refinement. The NHED identified these areas, and potential remedies. Whereas these practices do not rise to the standard of noncompliance, and therefore require no corrective actions, the NHED believes these items warrant being addressed as areas in need of refinement.

- Some of the services for Specially Designed Instruction (SDI) were written for an entire school day rather than the amount of time necessary to work on goals in specific areas. Since being made aware of this issue, staff participated in SDI training provided by NHED Bureau of Special Education Support and will continue to work closely with LEAs to amend IEPs not correctly reflecting services for SDI.

Overview of the Monitoring Review for Approval of Special Education Programs Process

Each Private Provider must meet the requirements for special education program approval pursuant to The Individuals with Disabilities Education Improvement Act (IDEA) (2004), The New Hampshire Standards for the Education of Children with Disabilities, and New Hampshire State Statutes (RSA 186-C:5, RSA 189:64).

The Monitoring Review Process for Approval of Private Provider Special Education Programs ensures that students with educational disabilities have access to; can participate in; and can demonstrate progress within the general education curriculum, thereby

improving student learning. The primary focus of the monitoring review is to improve educational results and functional outcomes for all children with disabilities.

The NHED Bureau of Special Education Support's, (the Bureau's), Approval of Private Provider Special Education Programs Monitoring Process (AP3s) consists of a review of required application materials and an on-site component with program visit(s) and random sampling. The AP3s process occurs during the last year of approval of the Private Special Education Program (Private Provider).

The spring prior to the AP3s process, the Bureau notified Nashua Children's Home of the upcoming monitoring and scheduled a time to meet with the administrative team to review the process and answer any questions. The Bureau sent written communication in the fall of the monitoring year which included an overview of the monitoring process and tentative dates for the on-site Data Collection Form training and on-site monitoring visit.

As part of the AP3s process Nashua Children's Home submitted required application materials for review and the Bureau confirmed their nonpublic school approval.

The Bureau visited the program on Thursday, March 16, 2023, to conduct the AP3s on-site monitoring visit. Prior to conducting this visit, the Bureau conducted training to Nashua Children's Home staff on how to complete the On-site Data Collection Form for the random sampling and what would be acceptable evidence.

The AP3s Process has one main component to corrective actions titled, "*Corrective Action Regarding the Implementation of the Regulations*", which typically involves the Private Provider participating in or providing professional development training to appropriate personnel for areas found in noncompliance. For any corrective action regarding the implementation of the regulations, evidence of provided trainings is required and must be submitted to the Bureau. It is recommended that all corrective actions be verified by the Bureau within three months from the date of this report but cannot go unaddressed longer than one year of the date of the on-site monitoring visit. The final close-out letter will not be issued until all corrective actions have been verified corrected.

The New Hampshire Department of Education, Bureau of Special Education Support review members for this on-site monitoring review included Heidi Clyborne and JoAnn Marchant.

Special Education Procedures and Effective Implementation

Each Private Provider must have Special Education Procedures and effective implementation of practices that are aligned and support the implementation of IDEA and the *New Hampshire Standards for the Education of Children with Disabilities*.

During their 2017-2018 AP3s process, Nashua Children's Home Special Education Procedures were verified compliant the with State and Federal regulations regarding

administration, confidentiality of information, program requirements, responsibilities of private providers of special education implementation of IEPs, behavioral interventions, RSA 126-U Limiting the use of child restraint practices in schools and treatment centers, qualifications and requirements for instructional, administrative and support personnel, change in placement or termination of enrollment, physical facilities, health and medical care, photography and audio-visual recording, and emergency planning and preparedness.

Since then, there has been one rule change, (Ed 1119.01 Confidentiality Requirements), affecting the Special Education Procedures. Private Providers monitored for program approval prior to this change needed to submit, for review, only the sections of their Special Education Procedures pertaining to the revised rule.

Based on the review of Nashua Children's Home Special Education Procedures the monitoring team determined there were **0 findings of noncompliance**.

Private Provider Curriculum and Effective Implementation

Nashua Children's Home 1-8 curriculum was verified compliant during their previous monitoring review process in the learning areas of Arts Education, English/Language Arts, Health Education, Physical Education, Family & Consumer Science, Information & Communications Technologies, Mathematics, Science, Social Studies, and Technology Education, pursuant to Ed 306.26(b)(1) and (2) & Ed 306.27(c).

Since Nashua Children's Home last AP3s process, there has been one change to the New Hampshire Minimum Standards, Ed 306.49 Holocaust and Genocide Education Program, which was widely shared with all of New Hampshire's Private Providers of Special Education Programs in 2022.

As the State is reviewing and making additional revisions to the Administration of Minimum Standards (Ed 306), the Bureau will review approved special education programs curriculum for areas where there are revisions once all changes are in effect.

Based on the previous review of Nashua Children's Home curriculum, the monitoring team determined there were **0 findings of noncompliance**.

Personnel

The Bureau of Special Education Support has reviewed Nashua Children's Home personnel certifications using the New Hampshire Educator Information System. The review process was for educators employed during 2022 – 2023 school year.

The personnel roster that was provided by Nashua Children’s Home was compared to the data in the New Hampshire Educator Information System. Each personnel member’s endorsement was compared to the subject/assignment. This process was used for personnel that hold Beginning Educator Certification (BEC) and Experienced Educator Certification (EEC). If the endorsement was appropriate to the subject/assignment, then the renewal date of the endorsement was verified to ensure that the endorsement was current.

If there was a discrepancy between endorsement and the subject/assignment, the private provider was given an opportunity to verify the data. If the discrepancy could not be resolved a finding of noncompliance was made based on Personnel Standards pursuant to Ed 1114.10(a), 34 CFR 300.18, and 34 CFR 300.156.

Based on the review of Nashua Children’s Home personnel certifications, the monitoring team determined there was **1 findings of noncompliance**.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
34 CFR 300.18; 34 CFR 300.156; Ed 1126.02(b)(1)&(2); Ed 1114.05(j); Ed 1114.10(a)	Personnel Standards
<p>Finding of Noncompliance: In reviewing Nashua Children’s Home personnel there was 1 staff member with a subject/assignment as School Counselor; however, is not credentialed in School Counseling, resulting in 1 finding of noncompliance.</p>	
<p>Corrective Action regarding the Implementation of the Regulations: Nashua Children’s Home must hire or contract with teachers that currently hold appropriate credentials.</p> <p>Provide the Bureau with evidence that resolves the discrepancies between subject/assignments and endorsements as well as a description of the method used to inform staff to NHED as soon as possible but no later than 6 months from the date of this report.</p>	

Nashua Children’s Home was last notified of the concerns listed above, via email, on 3/21/2023. Staff specific information was included in the email.

General Program Approval Requirements

Each Private Provider must meet the requirements for special education program approval pursuant to The Individuals with Disabilities Education Improvement Act (IDEA) (2004), The New Hampshire Standards for the Education of Children with Disabilities, and New Hampshire State Statutes (RSA 186-C:5, RSA 189:64).

The monitoring review for the approval of Private Provider Special Education Programs includes an application with specified materials that must be submitted to the Bureau at least 30 days prior to the onsite monitoring visit in the year monitored.

Based on the review of Nashua Children’s Home application materials, the monitoring team determined there was **1 findings of noncompliance**.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
Ed 1114.04(g)	Professional Development Master Plan
Finding of Noncompliance: In reviewing Nashua Children’s Home application materials an approved current Professional Development Master Plan is not on file with the Bureau of Credentialing resulting in 1 finding of noncompliance .	
Corrective Action regarding the Implementation of the Regulations: Nashua Children’s Home must provide the Bureau with evidence that the Professional Development Master Plan has been reviewed and accepted by the Bureau of Credentialing as soon as possible but no later than 6 months from the date of this report.	

Program Monitoring and Random Sampling

Per RSA 186-C:5 the Monitoring Process must include on-site monitoring to include program monitoring and random sampling. The AP3s Process for Nashua Children’s Home included an on-site monitoring visit during which the Bureau monitoring team was provided with a program overview, visited all approved locations for the approved program and collected random sampling data using the On-site Data Collection Form. Random sampling data consisted of comprehensive reports per Ed 1114.06(i), (j), (k) and service implementation per Ed 1114.03(a).

At least 30 days prior to the scheduled monitoring on-site visit Nashua Children’s Home submitted to the Bureau a completed On-site Data Collection Form that included the information below.

- A coded list of twenty percent of the New Hampshire students enrolled in the program the year prior to monitoring for verification of comprehensive reports.
- A coded list of the services Nashua Children’s Home was responsible for providing to all of their New Hampshire students enrolled in the program during the three-week period of October 31, 2022 - November 18, 2022, for verification of service implementation. (Nashua Children’s Home was notified by the Bureau of the three-week time period on December 12, 2022).

At the on-site monitoring visit the Bureau monitoring team used the On-site Data Collection Form to verify evidence that Nashua Children’s Home completed a minimum of three comprehensive reports for each student on the list per Ed 1114.06(i), (j), (k) and that required services were provided during the designated time period per Ed 1114.03(a).

Based on the review of Nashua Children’s Home program monitoring and random sampling, the monitoring team determined there was **1 finding of noncompliance**.

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
Comprehensive Report Regulatory Component	Review Status
Ed 1114.06(i)	Each provider of special education or other non-LEA program shall complete a minimum of 3 comprehensive reports per year on each child with a disability enrolled in the program.
100% of student codes reviewed at the Nashua Children’s Home program demonstrated evidence that a minimum of 3 comprehensive reports per year are completed on each child with a disability enrolled in the program meeting all compliance criteria. This results in 0 findings of noncompliance since comprehensive reports reviewed were in 100% compliance.	

COMPLIANCE CITATIONS	AREA OF COMPLIANCE
Service Implementation Regulatory Component	Review Status
Ed 1114.03(a)	A private provider of special education or other non-LEA program shall be responsible for providing students with disabilities all services detailed in their IEPs unless the provision of those services has been agreed upon by contract with the sending LEA.
86% of all services detailed in the IEP, that were the responsibility of the Nashua Children’s Home program, had evidence demonstrating provision. This results in 1 finding of noncompliance since service provision was not in 100% compliance.	
Corrective Action Regarding the Implementation of the Regulations: Provide training to appropriate staff to ensure that the private provider implements special education and related services as outlined in the IEP.	
Provide the dates, names of attendees, and a description of the trainings, which defines the private provider’s procedure for complying with this specific rule, to the Bureau within 3 months from the date of this report.	
Corrective Action Verified prior to written report.	

Determining Program Approval Periods

In order to determine the length of program approval the Approval of Private Provider Programs is broken down into 7 sections. Points are accumulated based on the number of findings in each section and weighted towards those areas most directly impacting the provision of FAPE.

- Application Materials, not covered in other sections, (0-5 points)
- Curriculum (0-22 points)
- Personnel Certified (0-9 points)
- Required Staff (0-9 points)
- Special Education Procedures (0-5 points)
- Service Provision (0-40 points)
- Comprehensive Reports (0-10 points)

A program is given a percent score based on the total number of points received out of the maximum possible. The higher a percentage a program receives the shorter their approval period.

- 5 years: 0-20%
- 4 years: 21-40%
- 3 years: 41-60%
- 2 years: 61-80%
- 1 year: 81-100%

Based on the findings outlined in this report **Nashua Children's Home program** received a score of 12% **and a 5 year program approval.**