

**Foundations Upper Valley**  
*An S<sup>D</sup> Associates Special Education Program*



**Program Handbook**

**Please Contact**  
**Jessica Speckert, MA, BCBA, LBA**  
**Head of School**  
**for further information**

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## Contents

***Introduction to Foundations.....pg. 3-5***

Program Philosophy, Goals and Objectives  
Foundations Population  
Family Participation and Collaboration  
Organizational Structure

***Scope of the Program .....pg. 6-7***

Independent School Goals  
Daily Schedule  
Description of Daily Routine  
School Requirements

***Policies and Procedures.....pg. 8-19***

School Closures Due to Weather  
Student Illness  
Anti-Bullying/Anti-Hazing Policy  
Student and Parents Rights  
Behavior Management  
Suspension and Termination  
Filing a Formal Complaint  
Independent School Assurances Statement

# **Foundations Program Philosophy, Goals and Objectives**

## ***Mission Statement***

It is our mission at S<sup>D</sup> Associates to provide evidence-based services that will enrich the lives of individuals with disabilities and their families. We believe that all individuals can learn regardless of their challenges. We teach pro-social skills that enable meaningful community integration and support effective life-long learning.

## ***Foundations Population***

Foundations is approved by the Vermont Agency of Education to serve students within the following disability categories: Intellectual Disability, Other Health Impairment, Autism Spectrum Disorder, Developmental Delay, Multiple Disabilities, Traumatic Brain Injury, Speech or Language Delay, Emotional Disturbance, Orthopedic Impairment, and Deaf/Blindness.

## ***Program Philosophy***

Foundations, like all S<sup>D</sup> Associates programs, are based upon the principles of applied behavior analysis (ABA) and applied verbal behavior (AVB). Programmatic decisions are based upon the individual needs of the student and upon the supporting formative data. Functional assessment results and inventory of the students' behavioral and communicative repertoires will be used to develop individualized instructional programs for each student. Group program decisions will be based upon the needs of the participating students and upon current best-practice standards and guidelines.

Individuals with disabilities require structure and support in order to become more efficient learners. These supports include, but are not limited to:

- Structured positive reinforcement
- Predictable staff responding
- The use of structured teaching/learning opportunities
- Carefully controlled ecology/setting
- Instruction in cusp, or 'readiness for learning' skills (attention, cooperative responding and imitation) functional communication training (both listener and speaker behavior)
- Access to "natural" environments / materials for instruction.

Instruction will capitalize on students' strengths and preferences and use them as points of departure for increasing repertoires.

## ***Program Goals and Objectives***

- To provide a healthy and effective learning environment
- To teach the fundamental skills necessary to become as independent as possible
- To provide our students with programming that will make them the most successful adults that they can be
- To teach essential, effective communication skills
- To reduce and eliminate challenging behavior and other barriers to learning

## **Family Involvement and the Parent Advisory Group**

Extensive research has been done to show that family involvement greatly improves the outcome of treatment programs. The team at Foundations is dedicated to assisting families in every way that they can to ensure the highest quality of care for our students. Ongoing communication between home and school is consistent and is an important part of success. Home consultation services are available at an additional cost privately and/or through Medicaid, private insurance or ARIS funding sources. Through these services, professional staff are available to assist with skill generalization and to help our students become successful across all environments. If you are interested, please contact your BA for further information.

Parents, families, and community members are encouraged to take part in educational programming and contribute to school planning and decision-making. To assist with collaboration the Foundations administrative team will assist in the start-up of a Parent Advisory Group (PAG). The PAG is a group that allows parents and community members to be an active part in advising the school on matters concerning education, safety, and the wellness of students. At the time of enrollment and on an annual basis all parents will be invited to participate with the PAG. Meeting notices will be distributed at least 1 month in advance, at that time all parents will be invited to attend.

As our student population grows and parent involvement grows, roles will be assigned such as PAG Leader and PAG Administrator. During early development the Foundations Head of School will assist in the organization of meetings, agenda items, areas of discussion, etc. Upon steady attendance and participation, the Head of School will relinquish responsibilities to the chosen PAG Leader. Meetings will occur on a quarterly basis, will abide by Roberts Rules of Order, and will include the following standing agenda topics:

- Program Updates
- A Q&A session for administrators
- Legislative updates, Advocacy Opportunities and Community Resources.

Requests for additional agenda items will be taken up to 1 week prior to the meeting. Relevant school policies such as anti-bullying, anti-hazing, and other such policies as

required by VT AOE will be reviewed on an annual basis and subsequently as changes or adjustments are made. The professional staff team at Foundations will provide ongoing trainings; PAG members may request specific topics at any time. All meeting schedules, agendas, recommendations, along with any other PAG documents will be maintained on file both with the PAG Administrator and in the Foundations Administrative offices.

Specific questions regarding the formation of the PAG can be directed to [Jessica.speckert@sdplus.org](mailto:Jessica.speckert@sdplus.org).

### **The Foundations Leadership Team**

Jessica Speckert, M.A., BCBA, LBA	Head of School
Molly Smith, B.A., RBT	Special Educator
Amanda Clark, M.Ed., BCBA, LBA	Behavior Analyst
Carissa Courtemanche, B.A, RBT	Asst. Behavior Consultant
Erika Joy, M.A., RBT	Asst. Behavior Consultant
Taylor Anderson, B.A., RBT	Asst. Behavior Consultant
Megan Flye, B.S.	Regional Program Manager
Shannon Harrington, B.S, RBT	Program Support Instructor
Linda Gould, M.S., CCC/SLP	Consulting Speech/Language Pathologist
David Powsner, M.Ed., BCBA, LBA	Admin. and Clinical Support

*Please feel free to contact Foundations regarding any specific questions that you might have. Our contact information is as follows*

**147 Main St.  
Windsor VT, 05089  
Phone: 802-674-4428  
Fax: 802-674-4439  
E-mail: [Windsor.Admin@sdplus.org](mailto:Windsor.Admin@sdplus.org)**

**Questions pertaining to day-to-day operations, referrals, and enrollment can be directed to  
Jessica Speckert, Head of School**

**Questions regarding educational matters for currently enrolled students can be directed to  
Molly Smith, Special Educator**

**Questions regarding clinical matters for currently enrolled students can be directed to**

Jessica Speckert, Clinical Supervisor, or to the assigned Board Certified Behavior Analyst (BCBA) or assistant behavioral consultant (ABC).

**Independent School Goals**

Given the population of students at Foundations, the majority of the school day is spent working on their individualized education goals as stated in their IEPs. Goals related to their verbal behavior and adaptive behavior skills are addressed through ABA programming. Academic goals include reading, writing and math. Science and social study activities are imbedded in their daily programming. Along with the content areas, post-secondary opportunities are explored along with independent life skills, community participation skills, pre-vocational goal skills and functional communication training. In addition, following simple directions, responding to cues and directions from a teacher, are all skills that are being developed on a continuous basis across all activities. Please refer to our general schedule for more specifics. Structured teaching/learning procedures are developed to address these areas and to guide instructors on implementation. Data is collected during each session and are analyzed on a weekly basis to assess progress and program success. Speech/language consultation and training is provided to staff. Leadership team members collaborate to provide group instruction that meet fine and gross motor needs so that those content areas can be addressed on an integrated and ongoing basis.

**School Program Requirements**

Materials: Foundations will provide all program and instructional materials and supplies.

Meals: Foundations will provide all meals. Students will need to bring in their own lunches if they do not like what is offered or have dietary restrictions. A menu from a local source that provides student lunches will be sent home monthly. There is a refrigerator and microwave available for student use.

Extra Clothing and Contenance/Hygiene Supplies: Each student should bring in at least 1 full set of clothing to keep at school. If a student uses sanitary napkins, pull ups or other disposable products, at least a daily supply of these items should be sent in to keep on hand. Additionally, students should bring in any sunscreen, specific hygiene products such as deodorant, face wash, or face cream, which parents/guardians would like us to use on their child.

Over the Counter and Prescription Medications: If a student is to be administered medications, over the counter or prescription, we will need a consent form completed by a parent/guardian. For prescription medication, we will also need a copy of a physician's

order and medication delivered to a Foundations staff person directly from a parent. Medications sent in the backpack cannot be accepted. See attached health policies manual for additional information.

We will need to be notified if a student has allergies, and what the course of action would need to be taken if a student has exposed to the allergen.

### **Foundations Daily Schedule:**

\*Sample schedule is subject to change at discretion of staff

\*Individual student schedules vary

8:00-9:15	<b>Morning Chores and Hygiene</b> Put belongings away Sign In/Check In Make morning schedule as described in BSP Breakfast/Snack & Bathroom
9:15-10:30	<b><u>Morning Meetings</u></b> Calendar, weather, verbal behavior skills, social skills
10:30-11:15	<b>IEP / Individual Academics</b> Math
11:15-12:00	<b>IEP / Individual Academics</b> Reading/Writing
12:00-12:30	<b><u>Lunch</u></b>
12:30-12:45	<b><u>Clean up and prep for afternoon</u></b>
12:45-1:15	<b><u>PE</u></b>
1:15-2:00	<b>IEP / Individual Academics</b>
2:00-2:30	<b>Group Activities: Art, Health, Library, Board Games/Social Skills, STEAM</b>
2:30- 3:00	<b>Clean and Prepare for Home</b> Daily Chores Home school logs Bathroom Gather belongings

## Foundations Policies and Procedures

*Please note that all policies and procedures are kept on site and may be viewed by parents at any time.*

### **Policy Regarding Snow, Inclement Weather or Other Act of Nature**

**Please note:** Foundations Upper Valley retains the right to make all final decisions regarding school closures for any reason, regardless of the decisions of all other local or sending schools.

- Closures and delays will be posted on WCAX by 7 am. Other listing agents may be used as well and will be provided upon confirmation. All families will also be notified by phone (“robo-call”) with as much notice as possible.

Unless otherwise notified by a Foundations staff member, the following applies:

If sending school/district is closed, there will be no transportation provided to students coming from that district. Parents/guardians can elect to transport their child in the event that Foundations is still open. Please call the program phone @ (802) 558-3356 to let us know if your child will be attending school that day. When a winter weather advisory or winter storm warning is in effect, staff will not transport students in their cars. All snow days will be made up in accordance with AOE regulations.

#### **Definitions:**

**[Winter] Weather Advisory:** Issued when 2-4 inches of snow, alone or in combination with sleet and freezing rain, is expected to cause a significant inconvenience, but not serious enough to warrant a warning.

**Weather [Winter Storm] Warning:** Issued with a significant combination of hazardous weather is occurring or imminent. Significant and hazardous weather is defined as a combination of:

- 5 inches or more of snow or snow/sleet within a 12-hour period or 7 inches or more of snow/sleet within a 24-hour period.
- Enough ice accumulation to cause damage to trees or power lines.
- Life threatening or damaging combination of snow and/or ice accumulation with wind.

#### **Illness and Exclusion Policy**

At Foundations, we realize that all children have minor illnesses that do not prevent them from receiving regularly scheduled programming; if, however, your child is exhibiting any of the following symptoms we request that the parent call the program phone @



(802) 558-3356 as well as your transportation coordinator/dispatcher to notify the bus that they will not need to pick up your child, if symptoms appear before school.

**Please keep your child home if s/he is sick.** If your child is sent home sick from school, s/he will need to **remain home for at least the following school day** and may not return until s/he has been free of fever without the use of fever reducing medications (antipyretics) for **at least 24 hours** AND other symptoms are either **improving** or **resolved, depending on the symptom** (see below). A child should be well enough to meaningfully participate in their school day before returning to school.

All of the following symptoms can be highly contagious and if your child is experiencing any of them before school, please keep them home. If the symptoms appear at school, the student will be sent home.

- Fever of 100 degrees Fahrenheit or above.
- Diarrhea is a bowel movement that is loose, watery and frequent. If a student has two or more bouts of diarrhea at school, s/he may be excluded. A student with diarrhea must be symptom free for at least 24 hours before returning to school. In the case of blood in the stool, the student must be cleared by a physician before returning.
- Noisy/difficult breathing (wheezing, rattling chest, etc.) or severe/persistent cough. A student with difficulty breathing / cough must be fever free for at least 24 hours and symptoms improved before returning to school.
- Sore throat with a fever and/or an observable behavior change/inability to swallow (acting ill, lethargic). A student with sore throat and fever must be fever free for at least 24 hours and symptoms improved before returning to school.
- Vomiting. Stomachache with fever and/or an observable behavior change (acting ill, lethargic). A student with vomiting must be symptom free for at least 24 hours before returning to school.
- Rash with a fever and/or an observable behavior change (acting ill, lethargic) or with oozing open sores, or that is tender to the touch. The student may return once on antibiotics if needed, fever free for at least 24 hours and symptoms are improving.
- Conjunctivitis. Students may return once cleared by a physician or once symptoms have abated/resolved.
- Infectious illness such as: chicken pox, scabies, impetigo, mumps, measles etc. Students may return once cleared by a physician or once symptoms have abated/resolved.
- Insect infestations and parasites such as head lice, will not result in the student being sent home but will require that successful treatment begins before returning to school.
- Severe Headache. Severe headache with no other symptoms may result in a child being sent home from school. Child may return the following day if the headache is resolved. Headaches accompanied by other symptoms will require the student to be home the following day.

### COVID-19 Considerations

Because Foundations is a private, special-education school, many of our students have medical or developmental conditions which may make them especially vulnerable to the COVID-19 virus. This consideration has been factored into the development of our COVID-19 health policy.

If a student has a symptom or symptoms consistent with COVID-19, they may be sent home with a COVID-19 antigen test kit\*. If the student tests negative and meets the other health criteria described above (fever free and symptoms improved), they may return to school. Student should additionally take a second antigen test as close to 24 hours after the first test as possible. If the student remains negative and healthy, they may continue attending school as usual.

If a parent elects **not** to test their child, s/he will need to remain home for at least 1 additional school day. The student may return when their symptoms have completely abated/resolved and they have been fever free without the use of medication for 24 hours.

If a child tests positive for COVID-19, the student may return to school after 5 days of isolation (day 6 from onset of symptoms or positive test) IF their symptoms have improved and they have been fever-free for 24+ hours without the use of medication. The student will be required to wear a mask that completely covers the nose and mouth while in the building for days 6-10. If the student is not able to tolerate covering both nose and mouth throughout the school day, s/he may not be eligible to attend school until day 11.

Our COVID 19 policy may be updated at any time based on factors including, but not limited to changing guidance from the VT Department of Health and/or Centers for Disease Control.

*\*If we are not able to provide a test kit, the parent may use an over-the-counter antigen test, LAMP test, or PCR test.*

### **Anti-Bullying/Anti-Harassment Policy & Procedure**

At Foundations, we are dedicated to providing a safe and enriching environment for all students. Any form of harassment or bullying including cyber bullying and retaliation of any kind are strictly prohibited. All acts of bullying are prohibited on school grounds, during any and all school events or activities, and in any school or agency vehicles. The following procedure is designed to monitor and protect students against potential, accidental, or intentional bullying. The following policy and procedure is developed in conjunction with the Vermont Model for Bullying Prevention and Intervention Plan and

the Vermont Model Policy on the Prevention of Harassment and can be found on the Vermont Agency of Education Website.

Foundations recognizes that all students should have a safe, orderly, civil and positive learning environment.<sup>1</sup> Bullying is a form of dangerous and disrespectful behavior that will not be permitted or tolerated. Bullying may involve a range of misconduct that, based on the severity, will warrant corrective action and/or discipline. Behaviors that do not rise to the level of bullying may still be subject to intervention and/or discipline under another section of the discipline plan or policy.

For the purposes of this policy, “bullying” is defined as any overt act or combination of acts, including an act conducted by electronic means, directed against a student by another student or group of students and which:

- A. is repeated over time;
- B. is intended to ridicule, humiliate, or intimidate the student; and
- C. either:
  - a. occurs during the school day on school property, on a school bus or at a school- sponsored activity; or
  - b. does not occur during the school day on school property, on a school bus, or at a school-sponsored activity and can be shown to pose a clear and substantial interference with another student’s right to access educational programs.<sup>2</sup>

Examples of bullying include:

- Name-calling and verbal taunts
- Physical threats or actual physical harm
- Off-campus text messages or social media posts that ridicule or intimidate to the extent that the targeted student is not able to fully access the school’s programs

In order to be bullying, incidents such as the ones described above must be *repeated over time, directed at a particular student, and intended to ridicule, humiliate or intimidate.*

In some cases, acts of bullying may constitute unlawful harassment, where the conduct is based on or motivated by a student’s or student’s family member’s actual or perceived beliefs.

The Head of School for Foundations and Program manager have been designated to receive complaints of bullying and harassment. The names and contact information for those individuals are identified at the end of this section.

All staff at Foundations are subject to the anti-hazing / anti-harassment policies outlined the S<sup>D</sup> Associates Personnel Policy Manual.

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<sup>1</sup> 16 V.S.A. §570(a)

<sup>2</sup> 16 V.S.A. §11(a)(32)

Data reporting:

Foundation Upper Valley delegates the responsibility of data collection to the Program Manager. S/he shall collect data on the number of reported incidents of bullying and the number of incidents that have been verified and shall make such data available to the Vermont Department of Education.

**Relationship to Other Laws**

As indicated in the Vermont Model Policy on the Prevention of Bullying of Students and consistent with state and federal laws, and school philosophy, no person regardless of age shall be discriminated against in admission to the school or in obtaining the advantages, privilege and courses of study of such public school on account of race, color, sex, religion, national origin, or sexual orientation. Action will be taken by administration from any acts of discrimination or harassment.

**References and Applicable Standards**

Vermont Model Policy on the Prevention of Bullying of Students  
Vermont 16 V.S.A § 11(32)  
Vermont 16 V.S.A § 11(26), (A) & (B)

Alternative Complaint Process

In addition to, or as an alternative to filing a harassment complaint pursuant to this policy, a person may file a harassment complaint with the Vermont Human Rights Commission or the Office for Civil Rights of the U.S. Department of Education at the addresses noted below:

Vermont Human Rights Commission  
14-16 Baldwin Street  
Montpelier, VT 05633-6301  
(800) 416-2010 or (802) 828-2480 (voice)  
(877) 294-9200 (tty)  
(802) 828-2481 (fax)  
Email: [human.rights@state.vt.us](mailto:human.rights@state.vt.us)

Office of Civil Rights  
U.S. Department of Education  
5 Post Office Square, 8th Floor  
Boston, MA 02109-3921  
617-289-0111 (voice)  
877-521-2172 (tdd)  
617-289-0150 (fax)  
Email: [OCR.Boston@ed.gov](mailto:OCR.Boston@ed.gov)

## Legal References:

Title V, Section B, 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794 et seq.;  
Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d;  
Title IX of the Educational Amendments Act of 1972, 20 U.S.C. §§ 1681 et seq.;  
Family Education Rights Privacy Act; 20 U.S.C. 1232g;  
Public Accommodations, 9 V.S.A. §§ 4500 et seq.;  
Education, Classifications and Definitions, 16 V.S.A. § 11a (26);  
Education, Harassment, Notice and Response, 16 V.S.A. § 14;  
Education, 16 V.S.A. § 140(a)(1);  
Education, 16 V.S.A. § 166(e);  
Education, Harassment, Chpt. 9, Subchpt. 5  
Education, Discipline, 16 V.S.A. § 1161a;  
Education, Suspension or Expulsion of Pupils, 16 V.S.A. § 1162;  
Student Abuse, 33 V.S.A. §§ 4911 et seq.;  
Adult Protective Services, 33 V.S.A. § 6901 et seq., all as they may be amended from time to time.

## Designated Employees

The following employees of the FUV school campus have been designated to receive harassment complaints pursuant to this policy and 16 V.S.A. § 570a(a)(7)

Name: Jessica Speckert  
Title: Foundations Head of School  
Contact information: [Jessica.speckert@sdplus.org](mailto:Jessica.speckert@sdplus.org)

Name: Megan Flye  
Title: Regional Program Manager  
Contact information: [Windsor.Admin@sdplus.org](mailto:Windsor.Admin@sdplus.org)

## **Reporting and Responding to Incidences of Bullying/Harassment**

Any reports of hazing, or suspected hazing, may be made by staff, students, parents or guardians, or other involved parties orally or in writing. All oral reports should be formally followed up in writing. Should any of these events occur staff members are required to report the incident immediately to the designated administrator on call, either the head of school or program manager. If the reporter would like, any report may be made anonymously to ensure the protection of individuals involved during any investigation. All anonymous reports should be made directly to the program manager or head of school. During the annual training time, administrators will train all employees on the reporting procedure and have incident report forms available.

Any reports made to any other supervisory staff, will be reported to the head of school within 12 hours of the initial report. Upon determining if hazing has occurred, the head of school will conduct (or shall cause to be conducted) a formal investigation. If the head of school or her designee decides that disciplinary action is appropriate, the consequence will be determined on the basis of the facts found during the investigation, including the nature of the conduct, the age of the student(s) involved, and the need to balance consequences for behaviors exhibited.

If it is determined that a false allegation was made, that student may be subject to disciplinary action.

During the course of the investigation, investigators will take all appropriate steps to assess the need to restore a sense of safety to the alleged target and/or to protect the alleged target from possible further incidents. Portions of the investigation and follow up may include the following: creating a personal and/or group safety plan; determining appropriate preventative positioning for the target and/or aggressor in the classroom, while in transport or for offsite field trips or other school related activities. Following any and all incidents, or suspected incidents, anti-hazing policies, procedures, and follow up will be reviewed by the administrative team to ensure that all safety needs were met and will continue to be met on an ongoing basis.

At the point that it is determined that hazing has occurred parents/guardians of involved parties will be notified.

If it is determined that any criminal charges may be pursued against the aggressor, the Head of School will notify the local law enforcement agencies.

### **Student and Parents Rights**

At Foundations, all students will be treated with respect regardless of age, race, gender, skills or other distinguishing characteristics. This is a value that is strongly held at S<sup>D</sup> Associates and reflects and responds to the fact that each student is an individual and unique human being who exists within the context of an equally unique family.

Parents and students have the right to confidentiality. All student and family records will be kept in locked cabinets and information will only be disclosed as it aligns with FERPA guidelines. At the time of enrollment, and annually thereafter, parents/guardians will sign documentation indicating whom we can and cannot share information with. Data collected in the program will also be kept in locked cabinets and only shared on an as needed basis, consistent with written consents from families.

Families have the right to participate in IEP meetings and receive regular reports on progress. An IEP meeting may be requested by a parent/guardian at any time. Invitations will be extended to anyone that the family requests participate.

Families have the right to understand the details of their student's school day and program. Foundations staff will provide tours, observation time, or answer any questions that may arise upon request. Requests for tours or observation time should be directed to the head of school. Requests for clinical or educational information should be directed to the clinical supervisor or assigned behavior analyst. Additionally, parents have the right to read any school policy or procedure that they would like. These documents are kept on site and are available for viewing upon request.

In an effort to keep records current, the Foundations team requests that any changes to personal information, including address, phone number, medications, emergency contact information, etc. to be reported within 24 hours of the change. Any changes to informed consent or release of information must be made in writing (or by email) and addressed to an administrator. Additionally, any changes to a student's legal status such as guardianship or, in drastic cases, arrest or community restrictions, must be made as soon as possible and no later than 24 hours following and judicial or administrative proceedings.

## **Behavior Management and Physical Interventions**

### **Physical Intervention Policy**

A preventative and behavioral (scientific, systematic, data driven, evidence-based) approach to the reduction of challenging behavior shall be used at all times, in accordance with the program philosophy described in the program policies and procedures guidelines.

The use of dense, structured, differential positive reinforcement shall be the primary method used to prevent the expression of challenging behavior and to increase the expression of pro-social and increasingly adaptive behavior in students enrolled at Foundations. Other preventative tools and measures include:

- Well-equipped classroom w/ minimal distractions
- Highly trained, supported and supervised teachers & Behavior Technicians
- Teaching attending & communication skills
- Following a consistent schedule & maintaining an effective pace of instruction
- Giving students many opportunities to respond
- Basing activities and reinforcers on demonstrable student preferences
- Treating students with respect (no threats or sarcasm) and with concern for their personal safety and dignity
- Providing for structured transitions and breaks
- Ignoring or re-directing challenging behaviors

- Teaching and reinforcing appropriate alternative and incompatible behaviors
- Finding students' strengths and building on them
- Teaching students to cope with new, different, or challenging setting events (e.g. new shoes, fear of dogs, food desensitization, tolerating short delays, etc.)
- Establishing clear and consistent expectations and reviewing them often
- Role modeling appropriate behaviors
- Making the instruction fun and interesting
- Using cooperative work groups
- Making data-based programmatic decisions

When despite best efforts at prevention, a student begins to respond in potentially dangerous ways, program staff are instructed and trained to interrupt predictably occurring challenging precursor behavior at the lowest perceptible level and to use a variety of tools (based on both individualized behavior support plans, standard classroom practices and professional direction/supervision) to direct that student back to the activity in progress and a schedule of structured positive reinforcement.

Under Vermont law, restraint is defined as: “the use of bodily force to limit a student’s freedom of movement.” Acting to prevent a student from engaging in a specific motor behavior while simultaneously allowing him/her to engage in other motor behaviors by engaging in preventative positioning or response blocking (e.g. placing a hand between a student’s head and a desk or standing between a student and a dangerous object or area or preventing a student from accessing a particular [reinforcing] object or item) do not, under this definition, meet the criteria for calling that process a restraint. Using a hand over hand technique to prompt a specific motor behavior (point to, touch, give, put in, etc.) does not meet the criteria for calling that process a restraint.

When a student engages in a potentially dangerous behavior and/or attempts to engage in a potentially dangerous behavior (in accordance with Vermont Rule 4500 and/or, with the consent of parents as part of a student’s individualized behavior support plan), restraint may need to be implemented. At which point, Vermont Rule 4500 reporting procedures will be implemented.

### **Suspension and Termination**

Foundations does not use suspension or expulsion as a form of discipline. A student would only be suspended or expelled in the event that the student presents such a severe safety risk that his/her safety or the safety of other students could not be reasonably guaranteed.

Foundations will try every available means to maintain the placement of each student until the sending district is able to identify an alternative placement for that student.



In the unlikely event that a student is suspended, Foundations will immediately notify the parents or guardian and the sending district. Within 24 hours Foundations will send a written statement explaining the reasons for suspension to the above-listed parties. Once a student has been suspended for three consecutive school days or five non-consecutive school days in a school year, the school, parents, and sending district, consistent with federal requirements, shall explore together all possible program modifications within the school in an attempt to prevent total suspension of the student from the program.

### **Termination**

Upon admission of a student, Foundations will ascertain a sending school district contact person. This contact person and the IEP team will be kept informed of the student's progress and will be immediately notified if termination or discharge of the student is being discussed.

Foundations makes a commitment to all sending districts or other responsible parties that we will attempt every possible means of maintaining the student's placement until the local administrator of special education or officials of the appropriate human service agency have had sufficient time to search for an alternative placement.

### **Planned Terminations**

Except in emergency cases, Foundations will notify the sending school district of the need for an IEP review meeting. The sending district will arrange such meeting and provide to all parties including the parent and if appropriate, the student, notice of this meeting (10) days in advance of the intended date of the meeting. The meeting will be held for the purpose of planning and developing a written termination plan for the student. The following criteria will be met:

1. The plan will describe the student's specific program needs, the short and long term educational goals of the program, and recommendations for follow-up and/or transitional services.
2. Foundations will thoroughly explain termination procedures to the student, the parents, the Administrator of Special Education and officials of the appropriate human service agency.
3. The written termination plan shall be implemented in no less than (30) days unless all parties agree to an earlier termination date.

### **Emergency Termination**

In the case of an emergency termination in circumstances in which the student presents a clear and present threat to the health and safety of himself or others, Foundations will follow the procedures set forth in paragraph 4311.3.

See below:

Vermont Department of Education

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State Board of Education Manual of Rules and Practices

Student Safety, Page 2

4311.3 (1) When a student, because of his or her conduct or condition, is an immediate threat to himself or herself, others, property or educational environment, the school district may take whatever action is appropriate under the circumstances, including, but not limited to, immediate suspension pending a hearing as soon as possible thereafter. In addition, in cases where a student brings a weapon (as defined in the federal Gun-Free School Act) to school, the school district must refer the student to a law enforcement agency and expel the student for a period of not less than one calendar year unless such expulsion is modified in accordance with the provision of 16 VSA §1166(b)(2) in circumstances such as but not limited to:

- (a) the student is unaware that he or she has brought a weapon to school,
- (b) the student did not intend to use the weapon to threaten or endanger others,
- (c) the student is disabled and the misconduct is related to the disability,
- (d) the student does not present an ongoing threat to others and a lengthy expulsion would not serve the best interest of the student.

### **Policy and Procedure for Filing a Formal Complaint**

Foundations and S<sup>D</sup> Associates is committed to an environment that encourages open communication not only with all employees, but also with the students and families that we serve. The following process is intended to provide families with an effective and impartial means of identifying and resolving problems and concerns. It is our intent to be as reasonable and fair as possible.

Managerial and administrative staff hold the responsibility of establishing and maintaining open lines of communication with families. With open communication, any person feeling frustrated should feel comfortable raising issues of concern or importance.

The first line of communication should be with the special educator or behavior analyst. This supervisor will assist in finding a resolution in any way possible.

In situations where a family member feels that the supervisor's response or resolution has been unjust, insufficient or inequitable, that person may pursue further steps to resolve their concern.

**Step 1:** The complaint should be brought forward to the head of school either verbally or in writing. Issues should be brought forward in a reasonable time period, ideally within 10 days of the original discussion with the supervisor, although there are times when time frames may be increased based on the nature of the resolution.

The individual filing the complaint will be asked to provide details of the issue or problem of concern and their understanding of the supervisor's initial response.

The head of school will gather and review the relevant facts and provide a response. Responses will be provided in a timely manner. If necessary, a meeting or meetings will be held with the supervisor, staff person, or any other individuals directly involved.

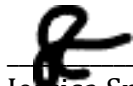
**Step 2:** Should the matter still remain unresolved OR involve any unethical acts or treatment on the part of any employee of Foundations or S<sup>D</sup> Associates in accordance with the Ethics Code for Behavior Analysts as written by the Behavior Analyst Certification board; a formal complaint should be filed and submitted to the BACB and/or the Vermont office of professional regulation. The head of school, upon written request, will provide the necessary documentation. Any and all formal complaints will be kept on file.

The Ethics Code for Behavior Analysts from the BACB are available to staff, students, and families upon request or can be gathered here: <https://www.bacb.com/wp-content/uploads/2022/01/Ethics-Code-for-Behavior-Analysts-220316-2.pdf>

*At the time of enrollment new students and families will be provided with this information. They will receive updates as this manual may be revised.*

### **Independent School Assurances Statement**

1. The school complies with the Vermont Public Accommodations Act (Title 9, Vermont Statutes Annotated, Chapter 141) in all aspects of the school's admissions and operations.
2. The school's facilities meet all applicable State and federal requirements.
3. The school complies with the requirements of 16 V.S.A. § 255 relating to criminal record checks and checks of the Child Protection Registry and the Vulnerable Adult Abuse, Neglect, and Exploitation Registry.
4. The school has adopted a policy on record maintenance and retention that, at minimum, provides for the timely and confidential disposition of student records in the event of the school's closure.



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