



# AUDIT SUMMARY

## Private Providers of Special Education Performance Audit

[www.ctauditors.gov](http://www.ctauditors.gov)

School Year 2022 - 2023

### BACKGROUND

We audited certain operations of private providers of special education that entered agreements with local education agencies during the 2022-2023 school year. The purpose of the audit was to evaluate whether providers of special education 1) spent state and local special education funds in accordance with contracts and student individualized education programs, 2) adequately delivered related services, and 3) engaged in key management practices to deliver quality special education.

We audited four private providers approved by the State Department of Education (SDE): Adelbrook Academy - Cromwell, American School for the Deaf, Grace S. Webb School, and High Road School of Wallingford. We also audited University School JPE, a non-approved private provider of special education. SDE does not have jurisdiction or oversight over non-approved private providers of special education.

### ABOUT THE AUDIT

In accordance with the provisions of Section 10-91g of the General Statutes, we have audited certain operations of Private Providers of Special Education. The scope of our audit included, but was not necessarily limited to, the school year 2022-2023 for approved private special education programs (APSEPs), and the school year 2023-2024 for the non-approved provider we audited. The non-approved private special education provider audited, began new ownership near the close of the school year 2022 - 2023. The objectives of our audit were to evaluate whether:

1. State or local funds to provide special education and related services from private providers of special education were spent in accordance with each student's individualized education program;
2. Private providers of special education adequately delivered services specified in each student's individualized education program;
3. Private providers of special education engaged in and maintained key areas of quality special education practice.

We conducted this audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

[Link to full report](#)

## 22 Findings

**Our audit identified internal control deficiencies; instances of noncompliance with laws, regulations, or policies; and a need for improvement in practices and procedures that warrant management's attention.**

## NOTEWORTHY FINDINGS



### Findings

1

Private providers of special education did not fully deliver services required by student individualized education programs (IEPs). Three private providers reviewed delivered between 52% and 91% of the related services required by student IEPs. Two of the providers did not have documentation that allowed us to calculate specific percentages. However the evidence reviewed showed similar patterns.

2

Our review of contracts between local education agencies and private providers of special education demonstrated a variety of issues, including missing statutorily required information and insufficient detail.

3

We were unable to find evidence of statutorily required background checks and Department of Children and Families Child Abuse and Neglect Registry records checks for several staff at three of the providers we reviewed.

4

At the time of our review, University School JPE did not properly train its staff in proper methods and application of the emergency use of physical restraint and seclusion. The school lacked formal documented procedures on how to respond when required to use emergency restraint and seclusion.

5

We found no evidence of the collection of statutorily required employer verification information for 18 of 47 staff at four of the private providers we reviewed. University School JPE did not conduct any required employment verification checks.



### Recommendations

Private providers of special education should deliver all related services specified in student IEPs. If they cannot provide all required services, they should notify the local education agency of any significant gap in service and work with the local education agency and the planning and placement team to revise the IEP or identify other necessary strategies.

The Connecticut State Department of Education should develop, in consultation with local education agencies and private providers, a model contract that would ensure clarity and statutory compliance and allow sufficient flexibility to address individual student needs.

Once developed, local education agencies and private providers should base their agreements on the model contract.

American School for the Deaf and Grace S. Webb School should develop internal controls to ensure they perform required background checks.

Necessary University School JPE staff should complete the required Criminal Justice Information Services (CJIS) training to receive CJIS data. Once trained, they should complete the necessary background check information.

University School JPE should develop written policies and procedures for the proper use of emergency physical restraint and seclusion.

The school should train all its staff in the proper methods and application of the emergency use of physical restraint and seclusion.

American School for the Deaf, Grace S. Webb School, High Road School of Wallingford, and University School JPE should develop internal controls to ensure employment verifications are completed for each applicant in compliance with Section 10-222c(a)(2) of the General Statutes.