

PLEASE SAVE A COPY ONTO YOUR DEVICE BEFORE ENTERING INFORMATION

Public Agency or Nonpublic School: Howard County

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Directions: Please complete this Corrective Action Plan Template as required by COMAR 13A.08.04 *Student Behavior Interventions*. This Plan Template should be signed by the Director of Student Services, the Director of Special Education, and the Superintendent, or the Director of Nonpublic School and Administrative Head of the Nonpublic School and submitted to MSDE through the Corrective Action Plan Template Smartsheet (bit.ly/3Ku7JmQ).

Corrective Action Plan

Failure to comply with any provision of the COMAR chapter

Please identify with what part COMAR your public agency or nonpublic school failed to comply (e.g., submitting forms late, not notifying parents/guardians within 24 hours).

Enter Noncompliance.

Reported that a student has been physically restrained or placed in seclusion ten times or more

This Corrective Action Plan Template will focus on how the public agency or nonpublic school will identify causes and hypotheses regarding the high number of

incidents of restraint and/or seclusion to reduce the overall number of incidents of restraint and/or seclusion or minimize the number of necessary restraints and/or seclusions.

For Public Agencies Only:

Please indicate where your policies state that seclusion is not permitted in public agencies in Maryland.

[Policy 9400](#) - Student Behavior Intervention Section III.H.2 states “HCPSS prohibits the use of seclusion in any and all circumstances within the public school setting.”

For Public Agencies and Nonpublic Schools:

Step 1: Gather the Single Incident Form(s), Part One Form(s), and Part Two Form(s) for all students who have received 10 or more incidents of restraint and/or seclusion this school year.

Step 2: Using those documents, determine what trends can be identified in the minutes that led up to the incident of restraint or seclusion, behavioral interventions already being used, and recommendations previously made. The follow pages may be useful:

- Preventative Strategies Implemented or Determined Inappropriate (Single Incident Form, p. 3-4)
- Precipitating Event/Antecedent (Single Incident Form, p. 5)
- Behavior that Prompted the Use of Restraint or Seclusion (Single Incident Form, p. 6)
- Pattern of Behavioral Health Interventions for the Student (Part Two, p. 3)
- Pattern of Behavioral Health Interventions Used by the School (Part Two, p. 4)
- Recommendations, School Specific Recommendations (Part Two, p. 5)

Step 3: Based on those identified trends, what can you determine to generally be the underlying reasons why high numbers of restraints and/or seclusions in your public agency or nonpublic school have occurred.

- Review the dropdowns below for possible reasons of why 10 or more incidents of restraint and/or seclusion have been used.

- Consider possible reasons for the high number of incidents of restraint and/or seclusion and are intended to start dialogue and facilitate ideas around possible reasons.
- Keep in mind that these reasons should be systemic and relate to the entire public agency or nonpublic school and should not focus on one particular student.
- After reviewing the list of reasons, please select 3-5 reasons below or you can type in your own causes that are not on the list.

Reasons

- 1. The IEP and/or BIP are not being implemented with fidelity on a consistent basis.**
- 2. Appropriate staff are not available to meet the therapeutic needs (i.e. access to social work services and wrap-around supports) of a student and therefore restraint is being used as a response to imminent, serious, physical harm.**
- 3. Staff require on-going additional tier 3 strategies/responses/supports to meet the complex needs of the individual students.**
- 4. Delays and availability of non-public placements result in students remaining in a setting that is unable to meet their needs.**

Step 4: Carefully analyze the reasons that you have listed above through discussion with the team.

- Identify data, both quantitative and qualitative, that should be analyzed.
- Develop a working theory about why that reason is leading to the high numbers of incidents of restraint or seclusion, after considering what you know about those reasons and the data.
- Review the dropdowns below for possible working theories of why your public agency or school has high numbers of incidents of restraint and/or seclusion.
- Keep in mind that these working theories should be systemic and relate to the entire public agency or nonpublic school and should not focus on one particular student.
- Try to limit your working theory to no more than 2-3 total working theories. You may have one working theory for all the reasons you listed above, or you may have a few.
- Select no more than 2-3 working theories below or you can type in your own that are not on the list.

Working Theory

1. When the IEP and/or BIP is not implemented with fidelity, preventative structures are not consistently in place and the teaching of replacement behaviors and effective coping strategies are not consistently occurring.
2. When students do not have access to the necessary, and highly specialized, therapeutic supports, students behavioral and mental health needs are not met.
3. When staff lack the skills or resources to implement sufficient prevention and minimization strategies/structures for students with intensive and complex needs, there is a higher likelihood of occurrence of behaviors that pose imminent, serious physical harm to themselves or others.
4. When a student has been referred to and is waiting for new placement, and the current placement is not equipped to meet the student's needs, the student may exhibit behaviors that pose imminent, serious physical harm to themselves or others.

Step 5: Create an action plan that describes how your public agency or nonpublic school will reduce the overall number of incidents of restraint and/or seclusion OR minimize the number of necessary restraints and/or seclusions. Your action plan should include:

- Steps that will be taken to reduce the number of incidents of restraint and/or seclusion;
- Timeline for completion; and
- Identification of support needed from MSDE.

Action Plan

Enter your Action Plan here.

Steps that will be taken to reduce the number of incidents of restraint and/or seclusion	Timeline
IEP/BIP Implementation Supports <ul style="list-style-type: none">• Revise our document that records additional follow-up and training needed regarding IEP/BIP Implementation, and as data collection for HCPSS.	On or before October 1, 2024

Steps that will be taken to reduce the number of incidents of restraint and/or seclusion	Timeline
<ul style="list-style-type: none"> ● The below process will be developed and shared with all DSE Central Office staff, Coordinator of Student Engagements and Supports, Coordinator of 504 and Instructional Facilitator for the Office of Psychological Services.. ● Central Office staff will follow up with school-based staff at the following increments to review the circumstances and fidelity of IEP and/or BIP implementation <ul style="list-style-type: none"> ○ 1st instance - CO staff receive a threshold email and they follow up with the school for consultation to review circumstances and identify staff needs. ○ 5th instance - CO staff receive a threshold email and CO staff follow up with school based staff to review circumstances and fidelity of IEP/BIP implementation and identify needs (document in google form) ○ 10th instance - MSDE reporting part 1 and part 2. Team consultation with Facilitator of Behavioral Interventions ○ 20+ instances - Continue to complete the MSDE part 1 and 2 forms and add team consultation with Dr. Jeff Bostic from MSDE. 	<p>On or before November 1, 2024</p> <p>Ongoing</p>
<p>Continued expansion of access to Practical Functional Assessment (PFA) and Skill Based Treatment (SBT) processes through updated assessment structures, facilitated by expanded training opportunities for staff members supporting our students with the highest level of need.</p> <ul style="list-style-type: none"> ● Identified staff in select specialized programs receive access to FTF training modules (PFA/SBT). ● Trained DSE staff support these teams in completing the assessment and programming the intervention. ● Students with existing FBAs/BIPs who are still engaging in significant levels of unsafe behavior are the target 	<p>Ongoing throughout SY24-25</p>

Steps that will be taken to reduce the number of incidents of restraint and/or seclusion	Timeline
<p style="text-align: center;">demographic for implementation.</p>	
<p>LSCI Training for schools with Regional ED programs to build a deeper understanding for staff of</p> <ul style="list-style-type: none"> ● how to move from being trauma informed to trauma responsive ● support staff with becoming first responders instead of reactors ● increase relationship building skills anchored in brain science 	<p>8 four day training sessions throughout SY24-25. Each training will include 2 staff from selected schools and CO staff</p>
<p>Professional Development</p> <ul style="list-style-type: none"> ● Safety Care Basics Module for all certificated staff ● All first year special education paraeducators received Safety Care Basics Training in person. It was also offered to Temporary Employees in person ● Select schools (by request) are able to request Safety Care Basics in person for staff ● All staff received Empower and Embrace Navigating Inclusion Disability Acceptance and Neurodiversity ● All staff received an MTSS Behavioral Health presentation focusing on Tier 1 strategies for all students ● Certificated staff received a module on Policy 9400 	<p>Fall 2024 August 2024</p> <p>Ongoing</p> <p>August 2024</p> <p>August 2024</p> <p>August 2024</p>

MSDE Supports

- Continued support through our MOU to access resources such as consultation with Dr. Bostic
- Facilitate conversations and connections with additional non-public options for students whose needs are not currently being met.
- Identify additional proactive and responsive evidenced-based strategies, supports, and resources for students exhibiting frequent and intensive physical aggression to self and others as a result of significant trauma history.

Signatures



Director of Student Services

Date



Director of Special Education

August 29, 2024

Date



Superintendent of Schools

August 29, 2024

Date

Nonpublic School Director

Date

Nonpublic School Administrative Head

Date