

Restrictive Procedures Plan ZED South Campus

In accordance with Minnesota Statute 125A.0942, Subd. 1, all Minnesota school district are required to develop and make public a plan that discloses its use of restrictive procedures. The plan specifically outlines the list of restrictive procedures the school intends to use; how the school will monitor and review the use of restrictive procedures, including post use debriefings and convening an oversight committee; and a written description and documentation of the training and staff that have completed the training.

ZED South Campus uses restrictive procedures only in response to behavior(s) that constitutes an emergency, even if written into a child's Individualized Education Program (IEP) plan or Behavior Intervention Plan (BIP).

1. Definitions

The following terms are defined as:

- a. "Emergency" means a situation where immediate intervention is needed to protect a child or other individual from physical injury. Emergency does not mean circumstances such as : a child who does not respond to a task or request and instead places his or her head on a desk or hides under a desk or table;a child who does not respond to a staff person's request unless failing to respond would result in physical injury to the child or other individual;or an emergency incident has already occurred and no threat of physical injury currently exists.
- b. "Physical holding" means physical intervention intended to hold a child immobile or limit a child's movement and where body contact is the only source of physical restraint, and where immobilization is used to effectively gain control of a child in order to protect a child or other individual from physical injury.

The term physical holding does not mean physical contact that:

- i. helps a child respond or complete a task;
- ii. assists a child without restricting the child's movement;

- iii. is needed to administer an authorized health-related service or procedure; or
 - iv. is needed to physically escort a child when the child does not resist or the child's resistance is minimal.
- c. "Positive behavioral interventions and supports" means interventions and strategies to improve the school environment and teach children the skills to behave appropriately.
- d. "Restrictive procedures" means the use of physical holding or seclusion in an emergency. Restrictive procedures must not be used to punish or otherwise discipline a child.
- e. "Seclusion" means confining a child alone in a room from which egress is barred. Egress may be barred by an adult locking or closing the door in the room or preventing the child from leaving the room. Removing a child from an activity to a location where the child cannot participate in or observe the activity is not seclusion.

2. Staff Training - Requirements and Activities

Requirements

Staff who design and use behavioral interventions will complete training in the use of positive approaches as well as restrictive procedures. Training records will identify the content of the training, attendees and training dates. A database containing records of all trainings will be maintained within the Zumbro Education District main office.

The following employee job classifications are authorized and certified to use restrictive procedures:

- Licensed special education teachers
- School social workers
- School psychologists
- Other licensed education professionals
- Highly qualified educational assistants

Activities

District staff who have routine contact with students and who may use restrictive procedures

receive training (both in-depth initial training and regular refresher training) in the following areas:

- a. Positive behavioral interventions;
- b. Communicative intent of behaviors;
- c. Relationship building;
- d. Alternatives to restrictive procedures, including techniques to identify events and environmental factors that may escalate behavior;
- e. De-escalation methods;
- f. Standards for using restrictive procedures only in an emergency;
- g. Obtaining emergency medical assistance;
- h. Physiological and psychological impact of physical holding and seclusion;
- i. Monitoring and responding to a child's physical signs of distress when physical holding is being used;
- j. Recognizing the symptoms of and interventions that may cause positional asphyxia when physical holding is used;
- k. District policies and procedures for timely reporting and documenting each incident involving use of a restricted procedure and;
- l. Schoolwide programs on positive behavior strategies

3. Oversight Committee

ZED South Campus oversight committee consists of the following individuals:

- a. Dean of Students-Michelle Frantzen
- b. Special Education Coordinator-Duane Ellingworth
- c. Regular Education Administrator-Amy Stites
- d. ZED Board Certified Behavior Analyst-Amy Rice

The oversight committee meets every quarter and will review the following:

- a. Physical intervention documentation to determine patterns or problems indicated by similarities in the time of day, day of week, duration of the use of a procedure, the individuals involved or other factors associated with the use of restrictive procedures, as well as review

individual due process paperwork.

b. The number of times a restrictive procedure is used schoolwide and for individual children

c. The number and types of injuries, if any, resulting from the use of restrictive procedures

d. Whether restrictive procedures are used in nonemergency situations

e. The need for additional staff training

f. Proposed actions to minimize the use of restrictive procedures

g. Communicate district training needs to the Zumbro Education District Special Education Director

4. Restrictive Procedures: Physical Holding and Seclusion

Restrictive procedures that may be used in emergency situations include physical holding and seclusion. Physical holding will end when the threat of harm has ended and staff has determined

that the student can safely return to the requested activity.

Physical Holding

a. ZED South Campus intends to use the following types of physical holding:

CPI High Level Seated Position, CPI High Level Standing Position, CPI Children's Control Position, CPI Team Control Position

Seclusion

ZED South Campus does not use seclusion.

5. Prohibited Procedures

ZED South Campus will never use the following prohibited procedures on a student:

a. Corporal Punishment which includes conduct involving:

i. hitting or spanking a person with or without an object; or

ii. unreasonable physical force that causes bodily harm or substantial emotional harm.

b. Requiring the student to assume and maintain specified physical position, activity, or posture that induces physical pain.

- c. Presenting an intense sound, light or other sensory stimuli using smell, taste, substance, or spray as punishment.
- d. Denying or restricting the students access to equipment and devices such as wheelchairs, hearing aids or communication boards that facilitate the student's functioning except when temporarily removing the equipment or device is needed to prevent injury to the student others or serious damage to the equipment or device, in which case the equipment or device shall be returned to the student as soon as possible.
- e. Interacting with a student in a manner that constitutes sexual abuse, neglect, or physical abuse.
- f. Totally or partially restricting a student's senses as punishment.
- g. Withholding regularly scheduled meals or water.
- h. Denying the student access to bathroom facilities.
- i. Physical holding that restricts or impairs a student's ability to breathe, restricts or impairs a child's ability to communicate distress, places pressure or weight on a child's head, throat, neck chest, lungs, sternum, diaphragm, back or abdomen, or results in straddling a child's torso.

6. Documentation of Physical Holding or Seclusion

Each time physical holding or seclusion is used, the staff person who implements or oversees the restrictive procedure shall document, as soon as possible after the incident concludes, the following information via use of the SPED Forms: "Use of Restrictive Procedures: Physical Holding" form:

- a. A description of the incident that led to the physical holding or seclusion;
- b. Why a less restrictive intervention failed or was determined by staff to be inappropriate or impractical;
- c. The time the physical holding or seclusion began and the time the student was released; and
- d. A synopsis of the student's behavioral and physical status.

Each time physical holding or seclusion is used, the staff person who implements or oversees

the restrictive procedure shall conduct a post-use debriefing with the building administrator or administrative designee within 2 school days after the incident occurs.

The SPED Forms “Staff Debriefing” form will be used to review:

- a. A description of the incident that led to the physical holding or seclusion;
- b. Why a less restrictive intervention failed or was determined by staff to be inappropriate or impractical;
- c. The time the physical holding or seclusion began and the time the student was released;
- d. A synopsis of the student’s behavioral and physical status;
- e. That staff were present and monitoring the situation and student safety;
- f. Review completeness of Sped Forms documentation;
- g. Review parental notification requirements;
- h. Determine if additional due process requirements need to be addressed;
- i. Ensure that all staff involved are identified;
- j. Ensure that staff using physical holds have up-to-date restrictive procedures training.

If the post-use debriefing meeting reveals that the use of physical holding was used inappropriately, the Building Oversight Committee will convene immediately to ensure corrective action is taken.

7. Documentation for an IEP

The use of restrictive procedures in response to an emergency may be documented in the student’s IEP or a behavior intervention plan attached to the IEP. Meetings of the IEP team will be conducted in accordance with MN Statute which requires review within 10 calendar days after restrictive procedures are used on two separate school days within 30 calendar days; when a pattern emerges and restrictive procedures are not included in a child’s IEP or BIP; or at the request of a parent or the district after restrictive procedures are used. At that time, the team shall conduct or review a functional behavioral analysis, review data, consider developing additional or revised positive behavioral interventions and supports, consider actions to reduce the use of restrictive procedures, and modify the IEP or BIP as appropriate. At the meeting the

team will review any known medical or psychological limitations that contraindicate the use of a restrictive procedure, consider whether to prohibit that restrictive procedure, and document any prohibition in the IEP or BIP.

If restrictive procedures are used on a child on ten or more school days during the same school year, the team either must consult with other professionals working with the child; consult with experts in behavior analysis, mental health, communication or autism; consult with culturally competent professional; review existing evaluations, resources, and successful strategies; or consider whether a re-evaluation is necessary.

8. Use of Restrictive Procedures-Parent Notification

ZED South Campus shall make reasonable efforts to notify the parent on the same day when restrictive procedures are used in an emergency. If the school is unable to provide same day notice, notice will be sent by written or electronic means or as otherwise indicated by the parent within two days. Documentation of how the parent wants to be notified when a restrictive procedure is used may be included in the IEP or BIP.

9. Positive Behavior Interventions and Supports

Positive behavior interventions and supports (PBIS) means interventions and strategies to improve the school environment and teach children the skills to behave appropriately.

At ZED South Campus, positive support systems begin with the mission of bringing order to the learning of disordered learners. For this reason orderly routines and classroom environmental consistencies are practiced throughout the day. To the greatest extent possible each instructional space begins and ends each period and day in an organized fashion. Room furniture and space are arranged for the next period's or day's use.

ZED South Campus also uses campus wide strategies that support, encourage and teach students the value of positive interactions. Embedded within the daily instruction are 7 Program Rules adapted from the Love and Logic for Classrooms, (Fey, Fey and Cline). Those rules are:

Do No Harm.

We will treat you with respect, so that you will know how to treat others.

Feel free to do anything that does not cause a problem for others.

If you do cause a problem, we will ask you to solve it.

If you cannot solve the problem, or choose not to, we will do something.

What we do will depend on the individual and the individual situation.

If you feel something is unfair, whisper, "I think that is unfair.", and we will talk.

Understanding that problems do occur, ZED South Campus believes that teaching students how to solve problems in productive ways is a key part of school wide positive behavior supports.

For this reason a Fix-It Ticket system has been implemented that guides a student along the intrapersonal and interpersonal paths that lead to problems being solved. The Fix-It system also assists teachers in identifying persistent problems that may require intervention through the IEP, Functional Behavior Assessment (FBA) and Behavior Intervention Plans (BIP) and Positive Behavior Support Plan (PBSP) components of special education.

ZED South Campus also utilized the Seven Habits of Highly Effective People for students and schools, (Covey, [et.al](#)). The seven habits are systematically taught to students and positively reinforced through use of a daily Habit Sheet. The Habit Sheet is used throughout the day to track students' performance on key habits of self-care, organization and task completion.

The Seven Habits are:

1. Be Proactive
2. Begin with the End in Mind
3. Put First Things First
4. Think Win-Win
5. Seek First to Understand then to be Understood
6. Synergize

7. Sharpen the Saw

Intentional and scheduled practice of Moments of Silence is an integral tool within the school wide positive behavior supports of ZED South Campus. Using routine and specific instruction before each task period students train themselves to be intentionally silent as a group for up to 5 minutes. Self-confidence and recognition that students are capable of and responsible for their own bodies and thoughts result.

A weekly school wide lottery is held to reinforce positive behaviors. Tickets for the lottery are awarded based on student performance on Habit Sheets as well as intermittent and spontaneous awards given by staff as positive behaviors are noticed.

Additionally, students are provided Positive Cards for demonstrating desired behaviors. The Positive Cards are given by staff and then collected by the Dean of Students. Thus two opportunities to reinforce desired behaviors are provided. At the end of the week 3 cards are randomly drawn from the collection and students whose cards are drawn can choose a prize from the school store.

APPENDICES

1.- Restrictive Procedures Training

Instructors:

Nicole Bingham-ZED South Special Education Teacher, Crisis Prevention Institute
Nonviolent Crisis Intervention Certified Instructor (Certified 04/2018)

Amy Rice-ZED Board Certified Behavior Analyst Certified instructor (Certified 8/2019)

ZED Restrictive Procedures Training Outline (12 hours of initial training) and includes the following information:

Legal definitions

Risks of physical restraint (staff and student, physiological & psychological)

If need to engage in physical holding, what is required

Guidelines for restrictive procedures

Due process requirements

Relationship building

- Communicative intent of behavior
- Positive behavior interventions
- Documentation Requirements
- Crisis Prevention Institute Inc-Nonviolent Crisis Intervention Units I – X
- Unit I CPI Crisis Development Model
- Unit II Nonverbal Behavior
- Unit III Paraverbal Communication
- Unit IV Verbal Intervention
- Unit V Precipitating Factors, Rational Detachment, and Integrated Experience
- Unit VI Staff Fear & Anxiety
- Unit VII CPI Personal Safety Techniques
- Unit VIII Nonviolent Physical Crisis Intervention
- Unit IX Situational Role Plays
- Unit X Postvention

ZED South Campus maintains a list of staff who have received restrictive procedures training. This includes staff name, date of initial training and dates of refresher training. This is on file at the ZED main office.

2. Links to area mental health services

Dodge County Children’s Mental Health

http://www.co.dodge.mn.us/departments/social_services_child_family_unit.php

Freeborn County Children’s Mental Health

<http://www.co.freeborn.mn.us/299/Childrens-Mental-Health>

Goodhue County Children’s Mental Health

<http://www.co.goodhue.mn.us/departments/socialservice/mentalhealth/mentalhealth.aspx>

Mower County Children’s Mental Health

http://www.dhs.state.mn.us/main/groups/business_partners/documents/pub/dhs16_175733~1.pdf

Olmsted County Children’s Mental Health

<http://www.co.olmsted.mn.us/cs/cfs/cmh/Pages/default.aspx>

Steele County Children’s Mental Health

http://www.co.steele.mn.us/departments/human_services/childrens_services.html

3. Documentation Forms

Restrictive Procedures Holding Form

http://www.zumbroed.org/sites/default/files/PDFs/restrictive_proc_physical.pdf

Use of Restrictive Procedures-Staff Debriefing

http://www.zumbroed.org/sites/default/files/PDFs/staff_debriefing.pdf

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