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Amherst-Pelham Regional  
School District

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Consultation Summary

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On Thursday, April 29<sup>th</sup>, CPIs Director of Client Services conducted a consultative site visit to the Amherst-Pelham Regional School District at the request of Ms Jo Ann Smith, Interim Director of Special Education. The following goals were established for the visit:

- Overall Training Evaluation:
  - Is our training comprehensive and does it utilize the most current research?
  - How can we ensure that everyone who needs training receives it and has ongoing practice?
  - Identify the strengths and places of improvement in the area of training and implementation.
- Review of the use of time-out and seclusion in the schools:
  - How well do we follow state guidelines regarding time out and seclusion?
  - Policy Review
- Compliance with Massachusetts Department of Education regulations and district expectations:
  - What is the process for analyzing the data that is kept and how does it help us identify needs?
  - Does our data comply with state regulations?
  - Do we communicate the appropriate information?
- Implementation Effectiveness:
  - How effectively are we using our de-escalation techniques?
  - How is data used and organized to help reduce the use of restraint and help identify useful de-escalation interventions?
  - Do we have clear intervention process that is comprehensive both before and after restraint?
- Monitoring and Documentation
  - How are we using our internal documents?
  - Drills, practice process in between trainings?
  - Connecting staff and admin to appropriate on-line material?

### **General Impressions:**

CPI commends Amherst-Pelham Regional School District for the steps it is taking to ensure the highest quality of service delivery throughout their special education services. It was immediately clear that the district schools function in a culture of calm and respect. Students were actively engaged at all buildings and programs visited. Staff were busy supporting students' needs with an obvious commitment to ensuring that learning was taking place in a safe environment. I appreciated the level of supervision at the high school during passing time. I have been in many school halls in between periods and have witnessed all kinds of chaos in those moments – what I witnessed in the high school of this district was adequate adult supervision and engagement – hall monitors greeting students; speaking with them about concerns; wishing them well in their day. Behaviors were controlled; volume was respectable and it had a sense of maturity and calm that I appreciated. These are important things to note because it is a

culture established like this that prevents incidents of bullying at a high risk time of day in a high risk location. The inclusive model of integrating special education students as much as possible into mainstream classrooms promotes a culture of tolerance and assists in educating regular education teachers and students as to how they can contribute to the educational and overall life experience of children with disabilities. The programming in the district allows for space for all students regardless of their learning styles and educational needs from elementary up through the secondary levels.

### **Overall Training Evaluation:**

- Is our training comprehensive and does it utilize the most current research?
- How can we ensure that everyone who needs training receives it and has ongoing practice?
- Identify the strengths and places of improvement in the area of training and implementation.

Amherst-Pelham Regional School District has an established training process for the *Nonviolent Crisis Intervention*® training program. Individual employees recognize “CPI” and spoke highly of the training class, with warm regard to the Certified Instructors at the district. The district reports training over 200 staff members in the *Nonviolent Crisis Intervention*® training program. The district employs two Master Level Certified Instructors, Mr Brent Nielsen and Ms Francine Cornacchioli. Both Instructors have successfully completed CPI’s *Nonviolent Crisis Intervention*® training program, Advanced Training Strategies and *Enhancing Verbal Skills: Applications of Life Space Crisis Intervention*SM. In addition, Mr Nielsen is also certified to teach CPI’s Autism Spectrum Disorders: Application of *Nonviolent Crisis Intervention*® training program. A review of the records indicates that both Instructors teach an 8-12 hour basic *Nonviolent Crisis Intervention*® course which is the recommended time frame established by CPI. The records also indicate that Formal Refreshers are conducted for staff in a range of 3-6 hours utilizing a variety of tools: Key Point Refresher Workbook, *Nonviolent Crisis Intervention*® Personal Prevention Plan and Autism Spectrum Disorders: Applications of *Nonviolent Crisis Intervention*® Advanced Refresher workbook.

**Strengths:** Amherst-Pelham Regional School District has strong administrative commitment to ensuring that employees receive the *Nonviolent Crisis Intervention*® training program and a Formal Refresher. The current training schedule includes opportunities for a variety of refresher options to meet the needs of different groups of staff. The staff I spoke with recognize “CPI” indicating the staff connect the training to daily practice at least at some level. The current training schedule follows CPIs standards as they relate to length, numbers in attendance and refresher frequency. Additionally, there is a database kept of individuals trained allowing the district to ensure timely Refresher options for staff and to validate the training individuals receive.

Outside of the delivery of the basic *Nonviolent Crisis Intervention*® training program and Formal Refreshers, opportunities are made available for staff to review, problem solve and have situational application discussions with the trainers in the district. These elements of the *Nonviolent Crisis Intervention*® Training Process further enhance learning transfer and reduce training drift.

To ensure compliance with 603 CMR 46.00 Amherst-Pelham Regional School District has developed a powerpoint presentation made available to all staff that addresses the following items: the program's restraint policy; interventions that may preclude the need for restraint, including de-escalation of problematic behaviors; types of restraints and related safety considerations, including information regarding the increased risk of injury to a student when an extended restraint is used; administering physical restraint in accordance with known medical or psychological limitations and/or behavioral intervention plans applicable to an individual student; and identification of staff who have received in-depth training pursuant to 603 CMR 46.03(3) in the use of physical restraint.

**Opportunities:** While staff recognized "CPI" they equated it almost 100% of the time with "restraint training". CPIs program is focused on the prevention of crisis situations, and the early detection and de-escalation of problem behaviors. While restraints are taught to be utilized as a last resort; CPI recommends assisting the staff with moving from the "Oh, we don't have to use CPI" – which means they don't have to utilize restraint techniques – to the thought that "We use CPI all the time so we rarely have to physically intervene". This comes through messaging, and is reinforced through elements of the training process such as reviews and situational applications.

There was some discussion from staff, mainly at the middle and high school level that the physical interventions taught could not be used with those age groups. This is borne out of a lack of confidence in how to safely and effectively apply the techniques. CPIs physical interventions are safer to apply, but not necessarily easier than floor restraints and do require staff to practice them to become proficient. More regular practice of both applying verbal de-escalation strategies and the personal safety techniques and physical restraints would help build staff confidence and further cement learning transfer from the classroom to daily practice. Amherst-Pelham Regional School District could more formally schedule elements of the ongoing training processed outlined in the Certified Instructors' training manuals: practice, review, policy discussions, situational applications, and drills/rehearsals to be more proactive as it sounds like the current process of accessing these elements of ongoing training is more likely to occur when there has been an event.

As noted Amherst-Pelham Regional School District is in compliance with 603 CMR 46.00. The district might consider branching out the required training that is now provided to all staff through a short presentation to allot for more staff to have CPI's preventive techniques or Units 1-7 and 10 of the training program.

CPI recommends that the Instructors begin to also implement the *Enhancing Verbal Skills: Applications of Life Space Crisis Intervention*<sup>SM</sup> training – they have both successfully completed the program. We would specifically suggest this be the formal Refresher at the beginning of the school year for those staff already trained at the South Amherst Campus and the East Street Alternative High School as those programs are consolidated into one program. The Life Space Crisis Intervention<sup>SM</sup> curriculum that is incorporated in this advanced offering was developed for youth and adolescents targeting the middle and high school age groups. Bringing the current staff of the two programs together to further investigate strategies for verbal de-escalation, limit setting and reclaiming or debriefing could benefit

the consolidation of the programs to help establish a consistent philosophy and framework for all staff to work from and could enhance team building between the two groups of staff.

Finally, CPI strongly recommends that Amherst-Pelham Regional School District implement PBIS training for all staff. PBIS strategies and premises align nicely with the strategies and premises of the *Nonviolent Crisis Intervention*® training program. PBIS is a framework promoting strategies that focus on all learners' social-emotional-behavioral needs and *Nonviolent Crisis Intervention*® training is a skills-based approach to preventing and responding to the social-emotional-behavioral needs of all individuals you support. While some of the PBIS concepts are integrated within our *Autism Spectrum Disorders: Applications of Nonviolent Crisis Intervention*® training program; full PBIS training is required in almost every state at this time. It is also written in to the recently proposed Federal Legislation – Specifically H.R. 4247 and S.2860 which if passed would set minimum standards for states to comply with related to the use of restraint and seclusion in schools and training for all educators. This school-wide approach can only further enhance the district's opportunity to eliminate or significantly reduce the use of restraint and time out. It may also assist the district in managing more challenging behaviors within the district for a longer period of time. CPI is also providing Amherst-Pelham Regional School District with the presentation notes from our recent webinar: "Positive Connections: CPI and Positive Behavior Support". This resource speaks further to the relationship between the two trainings and can be used as you review the webinar presentation which is hosted at our website for replay. CPI is able to connect the district to a resource person within schools who can speak more to the details of implementing PBIS as a school-wide initiative if needed.

#### **Review of the use of time-out and seclusion in the schools:**

- How well do we follow state guidelines regarding time out and seclusion?
- Policy Review

**Strengths:** Amherst-Pelham Regional School District has a comprehensive policy that follows the state guidelines. All staff receive education related to the policy within the first month of every school year or within the first month of hire if hired after the beginning of the school year.

Very little restraint is utilized in the middle and high schools throughout the district. Except for an occasional fight between peers, most behaviors are managed in the early warning stages effectively avoiding the need for physical restraint. While restraint is occasionally utilized at the elementary school level, I did not review any instances of extended restraint (physical restraint lasting more than 20 minutes as defined in 603 CMR 46.06). Therapeutic programs throughout the district staffed with a high staff to student ratio assists the staff with de-escalation for those students requiring an additional level of support. The instances of redirection witnessed during the visit were conducted positively and professionally. Staff relayed genuine care and concern about intervening early to avoid the use of restraint or time out. The school environments gave ample space for students to disengage from the classroom if they needed a break and this option was widely supported at all buildings.

As outlined earlier in this report, the training provided by the district is also as outlined in the State guidelines and the district policy. The reporting requirements for restraint use are also followed as outlined in the State guidelines, including parent/guardian notification. All incidents of restraint or time out are reviewed by the building administrator and reported to the SSO Administrator. A committee is convened to review any incidents where the response is in question. Restraint logs and time out logs are kept in every building or at every space designated for time out and reviewed by the *Nonviolent Crisis*

*Intervention*® trainers. Staff then have the opportunity to review the incident with the trainers and practice, drill or review curriculum as needed or required.

**Opportunities:** The state rule prohibits the use of seclusion restraint which is defined as: physically confining a student alone in a room or limited space without access to school staff. The use of “time out” procedures during which a staff member remains accessible to the student shall not be considered seclusion restraint. The current practice at Amherst-Pelham Regional School District is that time out is utilized as an option in two forms – those time outs requested by the student where they are allowed to take a break from their normal routine to regain composure and return to class and those that are initiated by staff. Staff initiated time out appears to be mainly utilized at the elementary level. At times this procedure also includes the act of confining the student in the time out room with the door closed, with the staff standing and observing through the window in the door. Because there is some question as to whether that is a seclusion restraint as defined in 603 CMR 46.00 or not, the district had the intervention reviewed by the Department of Education and has been permitted to utilize such procedure because staff are accessible to the student.

With that being said, CPI would recommend the district revisit the use of closed door time out in most situations. When reviewing other common definitions of seclusion such as those listed below the practice of blocking egress or not permitting the individual to leave, whether a locked room or another space is often defined as seclusion (which is prohibited by 603 CMR 46.00):

- Seclusion is the confinement of a student in a room or other space from which the student is physically prevented from leaving and which provides for continuous adult observation of the student. (MI Department of Education);
- "Seclusion" means the involuntary placement of an individual receiving services alone, in a locked room or secured area from which he is physically prevented from leaving (Virginia Administrative Code);
- Involuntary confinement of a person in a locked room or room where egress is blocked (AL Dept of MH);

Additionally, when reviewing the incident reports from the current year, there was clear pattern of behavior escalating once staff placed their hands on the student to utilize the CPI *Transport Position*<sup>SM</sup> to move them to the time out room. While we realize it is difficult to assess last resort in reading documentation of an incident. A large number of incidents appeared to be instances of disruptive or defensive behavior (defined as beginning to lose rationality, challenging authority, belligerent) that only escalated to what we would define as “acting-out person” behavior (total loss of physical and emotional control) when staff initiated physical contact.

CPI commends the district for utilizing restraint and time out as little as they do, however, the district is interested in moving toward zero restraints so CPI recommends re-visiting strategies for managing the defensive behavior, including the act of throwing objects in the classroom that do not include a physical intervention. While whether or not a thrown object is dangerous is dependent on variables such as what it is, who is throwing it, and the object’s intended target the district may try to adopt the strategy of attempting to remove other students from the immediate area first before removing the child who is beginning to act out. Staff are trained to block or deflect and move away from any strike, and a thrown object is considered a strike. Integration of the Enhancing Verbal Skills curriculum; continued exposure to the Autism Spectrum Disorders curriculum and the integration of a PBIS training will support staff in offering positive behavior choices earlier to reduce the instances of escalation. FBAs and regular debriefing can help staff build in more creative intervention strategies. It is often easier for staff to

change their intervention or approach than to teach a child to immediately change their behavior. While we work toward teaching positive replacement behaviors; that takes time requiring staff to be adaptable and flexible in their responses.

**Compliance with Massachusetts Department of Education regulations and district expectations:**

- What is the process for analyzing the data that is kept and how does it help us identify needs?
- Does our data comply with state regulations?
- Do we communicate the appropriate information?

**Strengths:** Review of policy and discussions with staff indicate that the follow up plan for documenting and recording incident of restraint and timeout within the district comply with the State Department of Education's rule (603 CMR 46.06). The forms utilized for reporting prompt staff to follow the protocols in place and ensure timely communication to all parties required.

**Opportunities:** While the data being logged and reported meets the expectations as outlined by the state regulations and district policy; the consultation did not fully reveal how data is being analyzed or utilized to identify needs. CPI suggests adapting forms (if possible) to incorporate program terminology. A critical piece in evaluating staff interventions is to go back in time and see how we as a group of staff responded to each level of the CPI *Crisis Development Model*<sup>SM</sup>. For example, the forms do ask for a description of the precipitating activity; what activity were students engaged in immediately preceding restraint use; what behavior prompted and/or justified the use of physical restraint and a description of efforts made to deescalate and alternatives to the use of restraint that were attempted. However, integrating program language can further tie learning to daily practice and promote objectivity as staff examine their own response at each behavior level. A simple chart of the model asking for specific behaviors and specific responses may illicit opportunities to intervene early if the situation should present itself in the future.

See example below:

<p>Anxiety: student was rocking in her chair and distracted easily by her peers</p>	<p>Supportive: we offered her the opportunity to change tasks and to sit in an area away from peers.</p> <ul style="list-style-type: none"> <li>• Intervention seemed to help for approximately 20 minutes</li> </ul>
<p>Defensive 1: when we transitioned to reading, student began to refuse to participate and raised her voice being more disruptive to the group.</p> <p>Defensive 2: after five minutes she returned to the group as prompted but quickly started rocking in her chair and talking out of turn while others were reading. When prompted to stop talking she threw her book across the room</p>	<p>Directive 1: we offered the choice to take a five minute break and then rejoin the group or to read alone at a desk by herself. She chose to take a break and moved to the break area.</p> <p>Defensive 2: we prompted the student to stop talking while others were reading –when student threw the book we immediately stopped reading group and the aid took other students to another area of the classroom.</p>
<p>Acting-out Person: As other students were leaving the area, she began to tip over chairs and attempted to slap the teacher twice.</p>	<p>Nonviolent Physical Crisis Intervention: staff utilized CPI Personal Safety Techniques to deflect the two slaps and then entered into CPI <i>Interim Control Position</i>(SM) for 30 seconds while other staff removed students from the room. Staff disengaged when all students were out of the room.</p>
<p>Tension Reduction: immediately at release of the restraint, the student began to cry, dropped down on the floor and curled up in a ball for five minutes at which time she followed staff directive to get up come to the sink and wash her face.</p>	<p>Therapeutic Rapport: staff continued to monitor and reassure student while she cried, but allowed her to cry. After five minutes the student followed the staff member’s request to come to the sink to wash her face. Once cleaned up she sat with staff and talked about how she was tired today because she can’t sleep at home because it is too loud with fighting. She was given the opportunity to rest for a half hour and then she rejoined the class and had no trouble for the rest of the afternoon.</p>

Documenting in this manner affords the opportunity in review to really examine not only student patterns of behavior but staff patterns in intervention strategies as well. For example, while the original intervention at the Anxiety level seemed to help for about 20 minutes we might note that it only helps for 20 minutes or until the next transition every time we take that approach. Or we might assess that she often acts up in class when she hasn’t gotten enough sleep the night before allowing us to offer an opportunity to rest at the anxiety level rather than waiting until after an incident occurred. Documenting in this manner might reveal that we didn’t offer any choices to someone in the defensive level or that we didn’t directly acknowledge and attend the anxiety level because another student was holding our attention at the time. While completely hypothetical I hope it illustrates how we can further use the program content to help staff utilize a common language for data collection and for analyzing situations and their own staff responses.

The final recommendation is to review at a district level at least quarterly all incidents of restraint and time out at an administrative level. A team should be designated to review incident reports as an

additional level of oversight. It is sometimes easier for a neutral party to see patterns or to think more creatively about strategies that might be implemented in a certain situation because they are completely detached from the student and the staff and the specific environment in which it is occurring. (It is possible the district has such review in place)

### **Implementation Effectiveness:**

- How effectively are we using our de-escalation techniques?
- How is data used and organized to help reduce the use of restraint and help identify useful de-escalation interventions?
- Do we have clear intervention process that is comprehensive both before and after restraint?

**Strengths:** In starting with how data is used and organized; Amherst-Pelham Regional School District does a nice job of keeping restraint and time out logs to accurately reflect and record incidents. The district utilizes a strong policy to keep in compliance with state expectations for reporting. The logs are monitored and it was reported that the student debriefing sessions are consistent. It is my belief that staff are generally successful in using de-escalation strategies effectively; however I was not able to observe enough student/teacher interactions to really comment. Due to the fact that restraint is almost never used at the middle or high school levels and used in relatively limited amounts in the elementary schools, it is a safe assumption that staff are opting for successful strategies early in the crisis moment.

Supporting the staff's successful de-escalation strategies is the environment of the classrooms. De-escalation is supported in many ways; one being a calm and comforting environment. The district has done an incredible job in creating safe and comfortable space for students. Classrooms are full of visual schedules and prompts, expectations are clear. For example, the use of a timer sitting on top of the computer is a great way to establish boundaries around time limits without it being a power struggle between the staff and students or between two students. Not only having areas where students can go to be alone or to take the time needed to get themselves back in order is critical, but more so is equipping staff to allow this to happen. I have been in many districts that have these great spaces, but a child requesting to utilize them turns into a power struggle.

**Opportunities:** While the Amherst-Pelham Regional School District has many pieces in place to prevent crisis from occurring it was reported that staff debriefing following an incident is "intermittent". Committing to consistent staff debriefing is a challenge for many organizations. However, in the case studies we have reviewed where an organization was able to reduce or eliminate the use of restraint; the one common variable contributing to the success every time is 100% staff debriefing. An immediate change in staff response can have a great affect on breaking the patterns involved in incidents of acting-out behavior. Even if through our debriefing we determine we absolutely did everything we could have possibly done we are then left with ideas for next time. Focusing on what *is* working is just as critical as looking at what may be less effective. This process allows us to reward and empower staff who are successful in de-escalating a situation and helps us stay out of the "that's just the way it is" point of acceptance. Creating an environment that is safe for introspection can allow staff to really look at the role they played in either escalating or de-escalating a situation. This same environment also allows us to challenge ourselves by asking – even when we were justified in using restraint – what could I do if

restraint weren't allowed? If a federal rule was passed tomorrow that prohibited the use of time out or restraint, what would or could we do differently to manage the situation?

### **Monitoring and Documentation:**

- How are we using our internal documents?
- Drills, practice process in between trainings?
- Connecting staff and admin to appropriate on-line material?

**Strengths:** The district reports that as incidents are reviewed opportunities to meet with the trainers are permitted and that practices and drills do occur then from time to time. A district-wide form is utilized to ensure consistency in the documentation of incidents. Staff seemed well educated on the policy and protocol which is often not the case within a school district. Staff in the therapeutic programs, AIMS programs, Intensive Learning Needs Programs and in-district day placements are regularly updated in the course concepts and afforded opportunities for practice or reviews.

**Opportunities:** One opportunity discussed that may assist the district with bringing the training and more regular refreshers or reviews to all staff is to transition to the hybrid delivery option of the *Nonviolent Crisis Intervention*® training program. This option allows the same content to be delivered in a blended way, shortening the "in-class" time by half. Certified Instructors who are authorized to teach the hybrid delivery assign "seats" to the staff for the web-based portion of the curriculum. Staff would take two to three hours of time to review each unit in the web-based portion and to print out their web-based entries they filled out as they moved through the curriculum. Participants then bring those entries to the "in-class" portion of the program where they review the content learned but focus more on applying the content to daily practice. This is also when the physical interventions are taught and the risks of restraint use are reviewed. While the portfolios or "seats" for the hybrid option are more expensive than the participant workbooks currently being used in the district, there may be a cost benefit in not having to release staff for a full day or two of training and pay substitutes or other replacement staff or overtime for them to attend training. Certified Instructors can access a cost calculator at the member-only website to investigate this opportunity further.

As mentioned in the earlier section – a higher level review at least quarterly of the internal documents may benefit the school district. CPI would recommend that the data get reviewed against increased training practices and reviews to see if the added elements of the training process impact the restraint and time out numbers. Another measurement the district may want to take is that of staff confidence; especially for new staff coming into the district receiving training for the first time. CPI has a staff confidence survey tool the district could utilize if you wish.

Finally, if the district would like to make more of the information available in a web-based format, CPI does license materials (DVDs) to be placed on internal learning systems. Putting it on a district LMS is sometimes more effective than trying to get groups of staff together to review a DVD on the course content. We would recommend our new advancing your verbal intervention skills series as a consideration for content. It is a three volume series with the third volume being practice scenarios that serve as a review of the content taught in the first two volumes.

### **Consolidating the Day Placements**

While not part of the formal consultation request; it was relayed to me while visiting that the district will be consolidating the two in-district day placements for high school youth. While equally successful, the programs have two distinct approaches to managing behavior. The youth will likely adapt more quickly to the changes than the staff; however staff inconsistency can create anxiety in the students which could lead to escalated behaviors this coming fall. Earlier in the report I did make a training recommendation that may assist the two staff groups in coming together with an agreed upon approach. Additionally, it will be imperative to do significant staff debriefing when incidents occur – even incidents of only verbal aggression or defensive behavior. The debriefing should be mediated with a neutral party initially to ensure all voices are being heard equally and all approaches for de-escalation equally considered. We would recommend focusing debriefing around the concept of the integrated experience; how the staff's behaviors and attitudes influenced the students' behaviors and attitudes. The premise of the Integrated Experience also means that power and control is gained and maintained when power and control are given in any way they are able to be. Empowering the youth to be independent and to have choice can build trust and reliability.

### **Summary**

It was a pleasure to assess the training for the Amherst-Pelham Regional School District. The program philosophy of *Care, Welfare, Safety and Security*<sup>SM</sup> were evidenced in many ways including: policy, programming, environment and staff interaction. Most impressive is the culture of calm and respect and the commitment to district-wide safety by the Superintendent, the district leaders, principals, assistant principals under the leadership of Dave Slovin, Administrator for Special Education. The district recognizes that overall school safety is a community issue that needs support from partners in the community as well as that internal support.

If the district chose to change nothing at this time, you would still be well ahead of some as it relates to the training and support for staff around managing disruptive and potentially violent situations. However, it is our impression that you wish to take things one step further. I am hopeful the recommendations made above will guide the district in taking that step. It was a pleasure working with you and we look forward to our continuing relationship.