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Policies and Procedures for Behavior Management

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Legal Reference: 18.03(7)(b)(2); 18.05(5, 6, 7); 28.09(11); 603 CMR 46.00; Updated ESE Advisory on Restraint in Special Education Program

Person Responsible: Shane Mayhew (School Operations Manager)

Additional Documentation: Individual behavior plans (I-RIPS) are kept in the student's file.

Purpose of Policy

To ensure Milestones' behavior support and management policies and practices promote positive behavior and protect the safety of students and personnel; and restrictive behavior management interventions are used in a manner that protects the safety and well-being of students and personnel in emergency or crisis situations when less-restrictive measures have proven ineffective.

Policy Statement

Physical restraint is only used in emergency situations as an intervention of last resort, after other lawful and less intrusive alternatives have failed or been deemed inappropriate. Milestones' personnel will only use physical restraint when a student's behavior poses a threat of assault and/or imminent, serious, physical harm to self or others. Time out is only used to provide the student with the means to calm down. The use of seclusion is prohibited. Milestones Day School protects students from mistreatment by assuring that no student will be subject to abuse or neglect, cruel, unusual, severe or corporal punishment including: any type of physical hitting inflicted in any manner upon the body, incitement or encouragement of mistreatment from other students, transfer or threat of transfer for punitive reasons, retaliation due to a report of program violations, verbal abuse, ridicule or humiliation, **denial or delay of food (other than for required medical prescription purposes)**, denial of shelter or bathroom facilities, physical activity that jeopardizes the health, safety, or emotional stability of a student including requiring the student to assume an uncomfortable position, group consequences for an individual's misbehavior, or extensive separation from the group. We also do not utilize medication, mechanical, supine or prone restraints, take-downs, or basket holds.

Definitions

Physical Escort - A temporary touching or holding, without the use of force, of the hand, wrist, arm, shoulder, or back for the purpose of including a student who is agitated to walk to a safe location.

Physical Restraint - Direct physical contact that prevents or significantly restricts a student's freedom of

movement. Physical restraint does not include: brief physical contact to promote student safety, providing physical guidance or prompting when teaching a skill, redirecting attention, providing comfort, or physical escort.

Time Out - A behavioral support strategy developed in which a student is temporarily separated from the learning activity or classroom, either by choice or by direction from staff, for the purposes of calming.

Consent - Agreement by a parent who has been fully informed of all information relevant to the activity for which agreement is sought, in his or her native language or other mode of communication, that the parent understands agreement is voluntary and may be revoked at any time. The agreement describes the activity and lists the records (if any) which will be released and to whom. In seeking parental consent, a public education program shall not condition admission or continued enrollment upon agreement to the proposed use of any restraint.

***Definitions for the following are embedded within the document:*

Response and Intervention Protocol

Individual Response and Intervention Protocol

Specific Preventative and Alternative Responses to Physical Restraint within CPI

Training and Annual Review

All staff receive annual training on behavior management including, but not limited to, items listed below (i.e. CPI, restraint, de-escalation, school-wide positive behavioral support interventions, etc...). Milestone's school nurse also provides annual training regarding the specific needs of individual students. This is completed within one month prior to the start of the school year for all staff. For any new employees hired after the start of the school year, they will receive this training within 30 days of hire. No employee shall participate in crisis intervention procedures until they have successfully completed the required CPI training and have been trained on the students' behavior support program.

Training shall include, but is not limited to:

- 1) Appropriate procedures for preventing the use of physical restraint, including the de-escalation of problematic behavior, relationship building and the use of alternatives to restraint
- 2) A description and identification of specific dangerous behaviors on the part of students that may lead to the use of physical restraint and methods for evaluating the risk of harm in individual situations in order to determine whether the use of restraint is warranted
- 3) The simulated experience of administering and receiving physical restraint, instruction regarding the effect(s) on the person restrained, including instruction on monitoring physical signs of distress and obtaining medical assistance
- 4) Instruction regarding documentation and reporting requirements and investigation of injuries and complaints
- 5) Demonstration by participants of proficiency in administering physical restraint and

- 6) Instruction regarding the impact of physical restraint on the student and family, recognizing the act of restraint has impact, including but not limited to the psychological, physiological and social-emotional effects.

Milestones shall maintain documentation of participation in training, including a copy of the prevention/restraint blue cards and the annual training logs in the personnel record of each employee.

Our Behavior Management policy is reviewed annually with staff. At the time of a student's admission, the restraint prevention and behavior support policy is reviewed with parents. Similarly, Milestones' parents are notified annually of our policy, and it is available for viewing on our school's website.

Behavior Management Philosophy and Prevention

Given the nature of our program and population, we will make every attempt to have staff prevent altercations between peers. In general, we are unable to appropriately and adequately service students with significant ongoing behavioral issues, chronic and active suicidal ideation, or homicidal ideation. However, many of our students do exhibit minor behavioral difficulties that are directly related to their disability, such as becoming over-stimulated and melting down, misreading a social cue and getting upset, occasionally acting out to avoid tasks or gain a staff member's attention, making comments that may appear "rude" or blunt, etc. It is the school's fundamental belief that children who engage in acting out behavior are lacking appropriate coping skills or resources in that moment. When children engage in this type of behavior, we use these situations as learning opportunities and teach them using social corrections such as role-playing, processing, apologizing, writing social stories, etc. For some students, use of behavior reinforcement systems may also be appropriate at this time.

Milestones' staff strives to recognize early warning signs that a student is becoming stressed with the ultimate goal of teaching the student to recognize these warning signs and take action at this stage to prevent further escalation. Each student has their own early warning signs; some examples might be excessive talking, excessive questioning, fidgeting, etc. Milestones' staff members do their best to recognize these signs and intervene at this level before the situation escalates or a crisis occurs. Most techniques involve helping the student recognize that his/her body has changed arousal levels (i.e. using a 1-5 scale to give vocabulary to increased anxiety, increased anger, etc., or a body recognition chart to see where he/she is becoming more tense) and helping the student to employ strategies to decrease his/her arousal level.

The school's approach to behavior management is based on an extensive system of positive reinforcement for appropriate actions, tangible rewards, planned ignoring of specific and well-defined behaviors, and consequences for inappropriate actions. For the most part, students receive verbal encouragement and concrete rewards/privileges for positive behavior. Our approach includes changing the antecedent (what comes before the behavior) or changing the consequence (what comes after the behavior), as appropriate. For example, if a child is sensitive to noise and acts out whenever there is excessive noise, we might alter the antecedent by making the room quieter and/or providing the student with headphones. We may also alter the consequence by giving the child a reward each time he/she tolerates being in a noisy environment. All students use a standard token-economy system and earning points for pro-social behavior or absence of specific targeted behavior displayed. The targeted actions are based upon a combination of school-wide

expectations and individual goals. All of our students follow a school-wide behavior plan call a Response and Intervention Protocol (RIP), but many students may also have an Individual Response and Intervention Protocol (I-RIP) that deviates from our school-wide behavior plan to either address specific issues that are not targeted in our school-wide RIP and/or when the school-wide RIP is not effective.

Students may exhibit a variety of behaviors, some of which Milestones will create specific plans to address. Other behaviors may be beyond the scope of what Milestones can offer and we may refer elsewhere for the student to receive help on a short term or permanent basis.

All students at Milestones use our Response and Intervention Protocol which is outlined in this document. Parents sign yearly consent to this standard school-wide behavior plan. If a student requires a modification from this protocol, the classroom staff provide data on the specific concerning behaviors and then the student's Individual Response and Intervention Protocol is created. This document is provided to the student's parents/legal guardian(s) for written consent in order to use the new protocol. Some examples of concerning acts that may warrant an I-RIP include, but are not limited to: any concerning behavior that lasts more than 2 weeks and is backed up by data collection from the teaching staff, school refusal that lasts more than 3 consecutive days, physical threats or injury to self that is not imminently dangerous (ideal threats, hitting self in the head, etc.), high risk behavior (bolting out of school, doing something impulsive that results in unsafe behavior and was not planned), sexualized behavior, bullying behaviour, or any time a student requires an escort, restraint, or in-house suspension.

Due to the nature of our student's disabilities, some students may exhibit self injurious behaviors and/or suicidal thoughts from time to time. Depending upon the severity of the thoughts, Milestones may make a referral to our crisis team or an outside crisis team and/or may transport the student to the nearest emergency room for a psychiatric evaluation. Should a student exhibit signs of suicidal or homicidal ideation, our protocol is that the student will meet with our psychologist who will then determine the appropriate next steps. Examples include, but are not limited to, any indication of suicidal ideation including verbal, written, gesture expression, or another student's report such as, "Billy told me he was going to kill himself", or any indication of homicidal ideation with intent to harm (this includes verbal, written, gesture expression, or another student's report such as, "Billy told me he was going to kill me"). This does not include impulsive statements that are frequently stated such as a student being upset and saying casually "I'm going to kill you". Any referrals to the crisis team will also include a phone call to the student's parents, district, and both Milestones and outside therapists, if applicable.

Milestones is not equipped nor do we have expertise to work with students who exhibit extreme physical threats on a recurring basis, homicidal threats or behavior, sexual assault/aggression with contact, criminal behavior on school property or at MDS related events (i.e. stealing, selling weapons, drugs/alcohol, pornography, etc.), or extreme self-injury in school. Should students engage in this type of behavior, we will make the determination as to whether transport to the nearest emergency room for a psychiatric evaluation is necessary. Milestones may opt to hold an emergency meeting to determine if the student's placement continues to be appropriate.

Time Out:

The time out space (also known as the “safe space”) is a small, safe room with four walls, a custom impact free floor, a door with a mushroom device such that a student is never locked into the room, and shatter proof plexi-glass so staff has the ability to monitor the student visually at all times. It is clean, safe, sanitary, and appropriate for the purposes of calming. This room is also temperature controlled so the student is comfortable. If we are unable to escort a student to time out or keep the student safe we may call 911 to access the support of police and emergency workers.

Time out is an intervention that should be reserved for use only when students are displaying behaviors, which present, or potentially present, an unsafe or overly disruptive situation in the classroom. In such circumstances, the student may either ask to leave the classroom, or the student may be directed to a separate setting for the purpose of helping the student to calm. Unless it poses a safety risk, a staff member must be physically present with the student who is in a time out setting. If it is not safe for the staff member to be present with the student, the student may be left in the time out setting with the door closed. However, in order to ensure that the student is receiving appropriate support, staff members are able to view the students visually at all times.

During the time out, staff are required to supervise and assess the student to ensure safety and support, and should be accessible to the student at all times. Staff must document the use of any time out procedures, and documentation procedures are described in detail within our reporting, notification, and follow up procedure section below. Time out will cease as soon as it is safe to do so. Any time out lasting longer than 30 minutes will require the approval of the principal or CEO and an assessment will be made as to the next appropriate steps to best support the student. The student shall be returned to the group and to regular program activities as soon as his or her behavior indicates that it is safe to do so.

The use of seclusion is prohibited in Massachusetts and therefore not utilized by Milestones. Seclusion is the involuntary confinement of a student alone in a room or area from which the student is physically prevented from leaving. The key elements of this definition are two factors considered together, (1) the student is alone with no staff present or immediately available; and (2) the student is prevented from leaving the area.

Crisis Prevention Intervention: Description & Preventative Alternative Methods

The most important aspect of any behavior intervention is knowing the student. Staff must be familiar with each student, their history, what approach works best, and what does not work. Each year all of our staff are trained and certified in Crisis Prevention Intervention (CPI). This method promotes verbal crisis de-escalation and minimizes the use of restraints. Should a restraint need to be used, CPI teaches safe techniques which permit the student maximum comfort and do not restrict breathing. Should a child have a behavioral incident, we will use the least restrictive methods while keeping students and others safe. The focus of CPI is to help an individual through a conflict in a way that restores calmness and teaches the individual better, more constructive and effective ways to deal with stress or difficult situations. Some types of interventions may include:

- ***Structuring the environment:*** including thinking about where we choose to discuss situations,

whether we sit or stand, the tone a staff member uses, etc.

- **Touch reminder:** lightly touching the student's hand, shoulder, or arm may provide a "reminder" that we are there which might provide the person with the additional support needed to remain in control (our staff are aware that in some instances, light touch can escalate a student and will not be used in these situations).
- **Proximity control or taking space:** having someone close to or further away from the person might be calming depending on his/her personality. This may also take the form of asking a student to move to a quiet, neutral, and safe area that minimizes visual and auditory stimulation and assist individuals in regaining control.
- **Prompting/verbal cues:** gentle verbal reminders to use appropriate behavior or learned coping skills or a verbal reminder to stop an undesirable behavior or inappropriate action. We would use one or two reminders before switching to a different technique.
- **Non-verbal cues:** using nods, sign, checklists, hand-gestures, or eye contact to remind the individual of behavioral expectations.
- **Prompting:** reminding the student of coping skills or the first few steps in conflict resolution.
- **Choice making:** providing at least two choices in daily activities, tasks, and routines.
- **Planned ignoring with positive feedback:** when students are engaging in attention seeking behavior and know alternative positive strategies to seek attention, but opt not to use them, the staff will use planned ignoring until the student participates in more appropriate behavior, at which time he/she will be praised for the appropriate behavior.
- **Redirection:** turning attention from an undesirable activity to one that is neutral or socially appropriate.
- **Directive statements:** informing the student of what he/she needs to do when the student's inability to make decisions for him/herself declines. Statements may range from requests to listening to rules to demands.

Having a neurocognitive disability does not necessarily make a person aggressive, engage in serious property destruction, or threaten others with a weapon. When students engage in this type of behavior, the child is considered out of control and in a crisis. Our staff's role now is to minimize the crisis and keep everyone safe. At this point, the person is not thinking or acting rationally, and negotiation or compromise is no longer an option.

Physical restraint will only be used as a last resort to escort a student to a safe environment, manage an episode of serious physical assault, or the substantial risk of such behaviors and when no other intervention has been or is likely to be effective in averting the danger. Examples of behavior that may require a physical restraint include, but are not limited to: assaultive or violent behavior, self-injurious behavior (i.e. hitting one's head on a wall or repeatedly punching one's self), threatening injury to self or others with a weapon, or bolting in an unsafe manner. If a student is hurting him/herself or others, as a last resort, the staff will use Crisis Prevention Intervention protocols; the staff will employ the use of restraint/escort. If we are in the community, the staff will physically restrain a student or escort him/her back to the school bus/van. If we are in our building, the staff will escort a student to the safe space until the student has regained control. Depending on the individual student's behavior plan, he/she may process the incident once calm, or at a later time. For some students, processing the incident is counterproductive and in this case, will not occur. If a student is unable to

de-escalate or continues to escalate and the threat of serious physical harm to him/herself or others is present, a staff member will call 911 to access the support of police and emergency workers. If any more than 2 restraints occur in a week for one specific student, a meeting will be held to discuss and all attendees will sign in, and minutes will be taken. More commonly, Milestones holds weekly supervision meetings for the elementary, middle school, and upper school staff (including respective speech and language pathologists, psychologists, occupational therapists, BCBA, school operations manager, principal, Head of Clinical Services), and students' presentations are regularly discussed so that changes, antecedents, interventions etc can be developed and reviewed. Similarly, parents and districts are regularly kept abreast of such concerns, and Milestones staff is regularly available for in-person and conference call meetings. Milestones may request such meetings with the parents/districts, as appropriate. Any time a significant incident occurs, the program shall implement follow up procedures within 24 hours. These procedures may include:

- Reviewing the incident with the student to address the behavior that precipitated the restraint
- Reviewing the incident with the staff person(s) who administered the restraint to discuss whether proper restraint procedures were followed
- Consideration of whether any follow-up is appropriate for students who witness the incident

Response and Intervention Protocol: Standard Responses to Behaviors

Below is a list of standard responses when a student is engaging in behavior that has not been exhibited before. If a new behavior that is not immediately dangerous or causes immediate harm emerges, staff will collect data for a period of two weeks. If the behavior persists, the team will meet to discuss an Individual Response and Intervention Protocol (I-RIP). Parents, and in some cases, the sending district, is kept abreast of behaviors listed below either through email, weekly phone call, or immediate phone call depending on the seriousness of the incident.

1) Not following directions, refusal, non-compliance, inappropriate tone/volume/cadence

- Questions teacher should ask:
 - What is my goal in controlling the student's behavior, following this direction, or using this tone?
 - What is the purpose of asking the student to follow a specific direction?
 - Have I offered choices to the student?
- Protocol:
 - Processing with student (using verbal and written processing sheet) with the goal of using empathic listening and understanding, from the student's perspective and helping the student to understand that there are more than one option.
- Response and education (administered by any teaching staff, clinical staff, or director)
 - Processing, if appropriate
 - Failure to earn points

2) Inappropriate acts that instigate and/or make others uncomfortable (i.e. swearing, talking about inappropriate topics, inappropriate gestures)

- Questions teacher should ask:

- What is causing this student to feel so uncomfortable or threatened that he/she is engaging in inappropriate behavior?
- What is the dynamic behind the interaction (i.e. was swearing aimed at one person or at the group)?
- Protocol:
 - Talking with the student outside of the classroom to figure out what's going on by asking questions
 - Redirecting, modeling, and explaining how others might feel based upon student's actions
 - If behavior continues when returning to class, the student will take a teacher directed break to process the situation. The break will be in the cool down area, a less reinforcing sensory space or couch.
 - Depending on the severity and number of times a threatening gesture occurs, this may be considered bullying and may be referred to the bullying protocol.
- Response and education (administered by any teaching staff, clinical staff, or director)
 - Failure to earn points

3) *Bullying defined as repeated targeted behavior designed to hurt someone*

- Information
 - Bullying will be addressed with Milestones' ongoing social skills curriculum and bullying curriculum
 - A big part of intervention occurs with the bystanders
 - All bullying incidents should be immediately reported to the CEO
- Protocol
 - A bullying report must be filled out and submitted to the CEO by the end of the day
 - The CEO will make a judgement call if the incident is a result of true bullying or is a manifestation of the student's social skill challenges
 - If the manifestation results from social skills deficits and is observed by a teacher:
 - Have a meeting with the admin team to discuss a plan (the closer to the event, the more effective the meeting will be)
 - Take the student out of the class and talk about the situation, with inquiry (ask why he/she targeted that particular person)
 - Mediate between the students involved in the incident
 - If the manifestation results from social skills deficits and is not observed by a teacher:
 - Verbally report to the CEO immediately and an investigation will be launched
 - If the incident is not a result of the student's challenges or the student is engaging in repeated bullying incidents, the parents, district, and other necessary people will be notified. If criminal charges may be pursued, the CEO will notify law enforcement
- Response and education

- An investigation will launch, starting with teacher/counselor if observed; or the CEO if not observed
 - If the incident was observed by an adult:
 - Student should immediately be sent to the principal's office. A counselor will stay with the student and monitor him/her until the event is processed.
 - The student will have lunch detention during the next lunch period with bullying intervention protocol monitored by a counselor
 - If the incident was not observed by an adult, but substantiated after an investigation, the CEO will determine consequences based upon their findings

4) Bolting

- Information
 - Bolting is interpreted at Milestones as the student is feeling overwhelmed and needing to escape from something. The focus should be on finding out what the student is trying to escape from and teach a better alternative.
 - Bolting is defined as leaving the assigned area without permission
- Protocol
 - If a student bolts outside of the exterior doors of the building or if the student bolts off of the playground/outside space to a dangerous spot (i.e. the parking lot), staff will immediately passively escort, but if necessary, physically escort to the safe space, a less preferred sensory space or couch area.
 - If the student bolts, but not dangerously, staff will verbally request that the student stops and attempts to verbally engage the student.
 - If the student is able and willing to talk, staff will explore what lead the student to leave the space (staff will review proper protocol such as "please ask for a break" or "please ask to use the bathroom").
 - If the student is unresponsive to verbal engagement, staff should walkie for assistance, maintain a safe distance to ensure the safety of the student, and use appropriate body positioning to prevent dangerous bolting. Give the student space and wait until the student is able to have a verbal dialogue.
 - If a student engages in a dangerous bolt while on a field trip, the student will not be permitted to leave the Milestones building for future trips until the team believes the student is safe based upon a discussion at the response team meeting.
 - If a student engages in a non-dangerous bolt or wanders away on a field trip (i.e. impulsively bolts to the next room to visit the exhibit before being instructed to do so), a staff member is immediately assigned to provide 1:1 coverage for this student. The staff member will review the expectations and give the student one warning. The staff will positively praise the student several times when he/she is staying with the group. If the student bolts again, the student will leave the field

trip immediately and return to Milestones.

- Response and Education (administered by any teaching staff, clinical staff, or director)
 - All students who engage in dangerous bolting behavior or bolting on a field trip that warrants coming back early will meet with staff to process upon return.
 - Failure to earn points
 - May result in loss of field trip privileges

5) *Verbal Escalation*

- Definition
 - Students who are exhibiting loud yelling while upset
- Protocol
 - With a neutral tone and body posture, the staff gives the student one reminder to use a softer voice and asks the student if he/she wants to talk outside of the room.
 - If behavior escalates, the staff ask the student in a neutral tone of voice and body posture to leave the classroom by saying a phrase such as “Let’s take a break”.
- Response and Education (administered by any teaching staff, clinical staff, or director)
 - Failure to earn points
 - When the event is over, staff will process with student verbally or use a processing sheet.
 - Modeling and rehearsing/role playing appropriate ways to get needs met

6) *Non-Contact disruptive behaviors*

- Definition
 - Aggression directed at no one in particular such as flipping a desk, kicking a locker, swiping objects off of a desk, etc.
- Protocol
 - Staff directs the student to take a break outside the classroom (calming area or couch)
 - Staff uses a processing sheet to determine why the student engaged in the particular behavior
 - Staff and student discuss alternatives to the behavior
 - Staff member calls the student’s parent to let him/her know of the incident
- Response and Education (administered by any teaching staff, clinical staff, or director)
 - When student de-escalates or at a good time for the teacher - the student will clean up the mess he/she made
 - Student will not earn points
 - Student will have a lunchtime detention and recess detention (or if incident occurs after lunch, the detention will be at all appropriate time)

7) *Isolated Act of Aggression*

- Definition
 - The student tries to hit another person, but misses, student kicks another person,

- or student throws an object towards a person. Isolated is defined as being in control after the aggression occurred evident by not repeatedly engaging in the behavior (i.e. kicks another person once then stops)
- If the incident is truly a non-contact disruptive behavior, but the student accidentally hits someone in the process, the incident is classified as non-contact disruptive behavior (i.e. a student is upset and swipes a chessboard off the desk and the pieces accidentally hit another student. However, if the student threw the chessboard at a person, this would be an isolated act of aggression)
 - This does not include acts of aggression that occur within contact sports (i.e. if students are playing a game and one student hits another with a ball)
 - Protocol
 - Staff directs student to take a break outside of the classroom (couch or cool down area)
 - Staff uses a processing sheet to determine why the student engaged in a specific behavior
 - Staff discusses alternatives to the behavior and role plays
 - Staff member calls the student's parents to let him/her know of the incident
 - A director fills out a suspension sheet which is sent to the student's parent and district
 - Response and Education
 - 3 hours of in-house suspension (suspension starts as soon as the student is brought to the director's office)

8) *Non-Isolated Incidents of Aggression*

- Definition
 - Body-to-body unsafe contact, more than one attempt during a single episode (i.e. several times punching, hitting, biting another person, etc.). This includes an attempt to engage in physical contact, but the student misses
 - The spirit of this behavior is that the student is aggressing and not stopping, therefore unable to regain control. If a student is throwing a punch at another person, staff should not wait to see if the behavior continues, but should block and move away if safe to do so. However, there are times that staff may not be able to get to a student in time and the student has stopped the behavior or the student de-escalates on his/her own very quickly after a punch is thrown - in these instances, this would be considered an isolated act of aggression. The point of differentiating is (1) if a student has de-escalated on his/her own, we do not want to put our hands on her/her which may re-escalate the student (2) we want to reinforce a student by having a lesser consequence if he/she makes an impulsive bad choice, but is able to recognize this and independently stop vs. needing to have an adult intervene to calm him/her down
- Protocol
 - Escort/restrain student to time-out using CPI procedures
 - Immediate discussion with other students about the incident. Touch base with

- individual students at wrap up to assist students who process events more slowly or may have a delayed reaction
- The crisis leader will immediately send an email to all teachers, letting them know about the incident
 - An incident report needs to be filed with the school operations manager within 24 hours of the incident
 - The case manager will call the student's parents and send a report to both the parents and the district
 - An immediate referral for an Individual Response and Intervention Protocol will occur
- Response and Education
 - In house suspension for full day (6.5 hours). The student will complete assignments during the in house suspension. Any assignments missed as a result of the behavior will be assigned for homework on top of the student's daily homework.
 - Processing event with each staff member
 - If the student receives an out of school suspension we will hold a follow up meeting with student's parents (in person or by phone), district, and school team prior to the student re-entering the classroom. If the student's parents are not able to meet, the staff will hold a meeting and send the meeting notes to the parents

Reporting, Notification, and Follow Up Procedures

Reporting within Milestones:

- Program staff must report the use of any physical restraint.
- Whenever a physical restraint is indicated during the school day the Principal or restraint authorized designee must be notified immediately.
- Steps must be initiated to contact the on-call Board Certified Behavior Analyst or School Operations Manager by the initial restraint authorizer as soon as possible, but no later than five minutes after the restraint is initiated.
- Every restraint must be documented and reported via email to the student's principal.
- If a restraint lasts for 20 minutes, staff shall receive approval from a principal to continue the restraint based on continued justification and need.
- When a restraint or time out occurs, all staff directly involved (including the principal, if appropriate) must sign off on the final incident report for accuracy. This report must be approved the School Operations Manager.

Parents are informed of all behavioral incidents by phone on the day of the incident. If a parent is unable to be reached by phone, an email will be sent to follow up. Any time a student requires a crisis team's intervention an incident report will be completed by the end of the school day and copies distributed to the child's family and district within three business days when there is a restraint or injury. If the parent customarily receives necessary school related information in a language other than the English the written restraint report shall be

provided to the parent in that language. The original copy will be kept in the child's file and is part of his/her educational record. If the student is not able to remain safe, we will call an emergency team meeting within five days of the event. During this period between the crisis event and the team meeting, the student will remain at home or another safe environment.

When a physical restraint is required, reporting is handled as follows:

- Any physical restraint of twenty minutes or longer and/or any physical restraint that results in an injury to the student or staff member shall be reported to the DESE.
- Any incident where the student is in the time out space with a closed door shall be reported to DESE.
- The school operations manager shall maintain an ongoing record of all reported instances of physical restraint and/or any physical restraint that results in a injury to a student or staff.
- The CEO or his/her designee shall verbally inform the student's parents or guardians of any physical restraint and/or any physical restraint that results in an injury to a student or staff member as soon as possible but by the end of the day the restraint was administered. A student's parent/guardian shall be sent a written report postmarked no later than 3 working days following the use of the physical restraint and/or any physical restraint that results in an injury to the student or staff. Milestones shall provide the student and parent an opportunity to comment orally and in writing ideally by the end of the day but within 24 hours on the use of the restraint and on information in the report in each instance. If applicable, such comments will be attached to the restraint incident form.
- When a restraint has resulted in injury to a student or staff member or when an extended restraint has been administered, the program, under DESE regulations, shall provide a copy of the report and the Student/Staff Restraint Injury Report within three (3) days of the administration to the DESE. If a student sustains a serious injury requiring emergency medical intervention resulting from a restraint a DESE Form 2 is also submitted.
- The Program shall also send the DESE a copy of the record of physical restraints maintained by the Operations Manager for the 30 day period prior to the date of the reported restraint. If additional action by Milestones is warranted, DESE will notify Milestones within 30 calendar days of receipt of the require written report(s).
- The Operations Manager must maintain an ongoing record of all ongoing instances of physical restraint that should be made available to the parent and/or DESE, upon request. A weekly review of behavioral incidents (including but not limited to restraints) is conducted by a multi-disciplinary team to identify students who have been restrained multiple times during the previous week. As indicated above in the Crisis Prevention Intervention Description and Preventative Alternative Methods section, parents are provided invitations to meetings to discuss their student's progress and needs when frequent behavioral incidents occur.
- An annual report is provided to DESE at the end of each school year which outlines all of the incident reports involving restraint or closed door time outs. The Operations Manager is designated to be responsible for the collection of the restraint data from the school and is responsible for ensuring that confidentiality and security is maintained.
 - The Operations Manager will collect data and submit one spreadsheet via a drop box on the security portal with all of the agency's restraint data to DESE on an annual basis.

Contents of Reports for Restraints Administered that the written report must include: Name of the

student; names/job titles; signatures of the staff who administered the restraint, and observers if any; the date of the restraint; the duration of the restraint; the name of the restraint authorized designee who was verbally informed following the initiation of the restraint; and, as applicable, the name of the restraint authorized designee who approved continuation of the restraint beyond 20 minutes; and the location of the time out. A description of the activity in which the restrained student and other students and staff in the same room or vicinity were engaged immediately preceding the use of physical restraint; the behavior that prompted the restraint; the efforts made to prevent escalation of behavior, including the specific de-escalation strategies used; alternatives to restraint that were attempted; the justification for initiating physical restraint. A description of the administration of the restraint including which of the holds was used (i.e., team control or child control); the student's behavior and reactions during the restraint; how the restraint ended; documentation of injury to the student and/or staff, if any, during the restraint and any medical care provided; processing and review of the restraint with the student following the restraint; and information regarding any further action(s) that the school has taken or may take, including any consequences that may be imposed on the student. The student's parents are also provided an opportunity to discuss with school officials the administration of the restraint, any consequences that may be imposed on the student and any other related matter.

Please note that Milestones' CEO and founder, in collaboration with the school's principals, school operations manager, and board certified behavior analyst, shall determine whether it is necessary or appropriate to modify the school's restraint prevention and management policy, conduct additional staff training on restraint reduction/prevention strategies, such as training on positive behavioral interventions and supports, or take such other action as necessary or appropriate to reduce or eliminate restraints based on DESE's updated policies and procedures.

Complaint Procedures and Response

Before initiating a formal complaint procedure, a student or his/her parent/guardian who has concerns regarding a specific behavior may seek to resolve his/her concerns by raising the issue with the CEO within ten (10) days of the parent/guardian's receipt of the written report. The CEO shall attempt, within his/her authority, to work with the individual to resolve the complaint fairly and expeditiously. If the student and/or his/her parent/guardian are not satisfied with the resolution, or if the student and/or his/her parent/guardian does not choose informal resolution, then the student and/or his/her parent/guardian may proceed with a formal complaint process.

A student or his/her parent/guardian, who has concerns regarding specific behaviors, may seek to resolve his/her concerns by submitting a written complaint to the CEO. The student and/or his/her parent/guardian should submit this letter to the CEO within twenty (20) days of the parent/guardian's receipt of the written report from the program. The written complaint shall include (a) the name of the student; (b) the name of the program where the behavior allegedly occurred; (c) the name of the individuals involved in the alleged behavior; (d) the basis of the complaint or concern; and (e) the corrective action being sought.

The CEO shall conduct an investigation into the complaint promptly after receiving the complaint. In the course of its investigation the CEO or designee(s) shall contact those individuals that have been referred to as having pertinent information related to the complaint. Written parent/guardian consent to speak to a student

shall be required for all students under the age of eighteen (18). Strict timelines cannot be set for conducting the investigation because each set of circumstances is different. The CEO will make sure that the complaint is handled as quickly as is feasible.

After completing the formal investigation, the CEO shall contact the individual who filed the complaint regarding the outcome of its investigation and its determination as to whether any corrective action is warranted.