

Broward County School District

Final Report: On-Site Monitoring  
Reporting Incidents of Restraint and Seclusion

March 19–22, 2013



Florida Department of Education  
Bureau of Exceptional Education and Student Services

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September 23, 2013

Robert Runcie, Superintendent  
Broward County School District  
600 S.E. Third Avenue  
Fort Lauderdale, FL 33301

Dear Superintendent Runcie:

We are pleased to provide you with the *Final Report: On-Site Monitoring Reporting Incidents of Restraint and Seclusion* for the Broward County School District. This report was developed by integrating multiple sources of information related to an on-site monitoring visit to your district on March 19–22, 2013. Those information sources included student record reviews, interviews with district and school staff and classroom observations. The final report will be posted on the Bureau of Exceptional Education and Student Services' (bureau) website and may be accessed at <http://www.fldoe.org/ese/mon-home.asp>.

The Broward County School District was selected due to a disproportionately low number of reported incidents of restraint as compared to other districts within the size-like group. Ms. Denise Rusnak, former Director Exceptional Student Education, and her staff were very helpful during the bureau's preparation for the visit and during the on-site visit. In addition, the principals and other staff members at the schools visited welcomed the monitoring team and demonstrated exceptional commitment to the education of all students. The on-site visit identified strengths related to the district's special education services and reporting and monitoring of the use of restraint and seclusion. In addition, the bureau's on-site monitoring activities identified noncompliance that required corrective action.

MONICA VERRA-TIRADO, Ed.D., CHIEF  
*Bureau of Exceptional Education and Student Services*

Superintendent Runcie  
September 23, 2013  
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A separate on-site monitoring visit was conducted at Carlton Palms Educational Center on June 18–20, 2013. This visit was related to the use of restraint for students with disabilities. Noncompliance related to documentation and reporting incidents of restraint and individual educational plan (IEP) development was identified for one of the case studies, a Broward County School District student.

Thank you for your commitment to improving services to exceptional education students in the Broward County School District. If there are any questions regarding this final report, please contact Patricia Howell, program director, Monitoring and Compliance, at 850-245-0476 or via email at [Patricia.Howell@fldoe.org](mailto:Patricia.Howell@fldoe.org).

Sincerely,



Monica Verra-Tirado, Ed.D., Chief  
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**Broward County School District**

**Final Report: On-Site Monitoring  
Reporting Incidents of Restraint and Seclusion  
March 19–22, 2013**

**Florida Department of Education  
Bureau of Exceptional Education and Student Services**



# Broward County School District

## Final Report: On-Site Monitoring Reporting Incidents of Restraint and Seclusion March 19–22, 2013

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**Broward County School District  
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March 19–22, 2013**

## **Authority**

The Florida Department of Education (FDOE), Bureau of Exceptional Education and Student Services (bureau), in carrying out its roles of leadership, resource allocation, technical assistance, monitoring and evaluation, is required to oversee the performance of district school boards in the enforcement of all exceptional student education (ESE) laws and rules (sections 1001.03(8), 1003.571 and 1008.32, Florida Statutes [F.S.]). One purpose of the Individuals with Disabilities Education Act (IDEA) is to assess and ensure the effectiveness of efforts to educate children with disabilities (s. 300.1(d) of Title 34, Code of Federal Regulations [CFR]). The bureau is responsible for ensuring that the requirements of IDEA and the educational requirements of the state are implemented (34 CFR §300.149(a)(1) and (2)).

In fulfilling this requirement, the bureau monitors ESE programs provided by district school boards in accordance with sections 1001.42, 1003.57 and 1003.573, F.S. Through these monitoring activities, the bureau examines records and ESE services, evaluates procedures, provides information and assistance to school districts and otherwise assists school districts in operating effectively and efficiently. The monitoring system is designed to facilitate improved educational outcomes for students while ensuring compliance with applicable federal laws and regulations and state statutes and rules.

## **Monitoring Process**

### **Background Information**

Section 1003.573, F.S., *Use of restraint and seclusion on students with disabilities* was created in July 2010 and established documentation, reporting and monitoring requirements for districts regarding the use of restraint and seclusion for students with disabilities. School districts were required to have policies and procedures that govern parent notification, incident reporting, data collection and monitoring the use of restraint or seclusion for students with disabilities in place no later than January 31, 2011. In July 2011, section 1003.573, F.S., was amended to require that the FDOE establish standards for documenting, reporting and monitoring the use of manual or physical restraint and occurrences of seclusion. In September and October 2011, the standards established by the FDOE were provided to school districts and were included in the district's *Exceptional Student Education Policies and Procedures* (SP&P).

Manually unduplicated data for restraint and seclusion incidents by district for August 2011 through June 2012 indicated that Broward County School District reported 237 incidents of restraint for 101 students and 93 incidents of seclusion for 40 students.

With 31,166 students with disabilities reported as enrolled in the district during this time period, 0.32 percent of the students with disabilities were restrained and 0.13 percent were secluded.

In a letter dated January 11, 2013, the superintendent of Broward County School District was informed that the bureau would be conducting an on-site monitoring visit due to a disproportionately low number of reported incidents of restraint as compared to other districts within the size-alike group.

The 2012–13 first quarter data from the FDOE’s web-based reporting system for incidents of restraint and seclusion indicated a decrease in restraint incidents reported (58 percent) and seclusion incidents reported (76 percent) when compared to the first quarter data from the 2011–12 school year. In response to a questionnaire from the bureau requesting information about the actions the district had taken to reduce the need for restraint and seclusion, the Broward County School District responded as follows:

- Effective Positive Behavioral Intervention Plans (PBIPs) based on Functional Behavioral Assessments (FBAs)
- Appropriate services and placements of the students
- Extensive monitoring and follow-up
- Extensive training

In response to the item on the questionnaire about resources, methods and strategies that the district has found to be effective in helping to reduce the number of incidents of restraint or seclusion, the district responded that the following training was required for any individuals who have been designated to receive training in the use of restraint:

- Positive Behavioral and Academic Strategies for Student Success (PBASSS)—a two-day training
- Professional Crisis Management (PCM) Training—a three-day initial training, with required seven-hour recertification training annually

In addition, all schools are required to have a team training in FBAs and PBIPs. These are two-day trainings.

### **School Selection**

Upon review of the district’s data reported via the FDOE’s web-based reporting system for incidents of restraint and seclusion, it was determined that the on-site monitoring visit would be conducted at Cross Creek School, Pompano Beach Elementary School, Riverside Elementary School and Whispering Pines School.

## **On-Site Activities**

### ***Monitoring Team***

The following bureau and Multiagency Network for Students with Emotional Behavioral Disabilities (SEDNET) staff members conducted the on-site monitoring visit:

- Misty Bradley, Compliance Specialist (Team Leader)
- Liz Conn, Compliance Specialist
- Brenda Fisher, Compliance Specialist
- Susan Bentley, Program Specialist, Emotional Behavioral Disabilities
- Jill Snelson, Program Director, Accountability Systems
- Annette Oliver, General Supervision Website (GSW) Administrator
- Carl Coalson, SEDNET Region 12 Project Manager
- Joanne Thornton, SEDNET Region 9 Project Manager

### ***Data Collection***

Monitoring activities included the following:

- Case studies – 9 students
- Classroom observations – 9 classrooms
- District administrator interviews – 2 participants
- School administrator interviews – 14 participants
- Teacher interviews – 9 participants

### ***Review of Records***

The district was asked to provide the following documents for each student selected for review:

- Current and previous individual educational plans (IEPs)
- Functional behavioral assessment
- Behavioral intervention plan
- Discipline record
- Attendance record
- Report cards
- Student schedule
- Parent notices and other documentation related to restraint and seclusion
- Verification of training for staff members involved in incidents of restraint or seclusion

## **Results**

### **FBA and BIP Review for Technical Adequacy**

Ten FBAs and BIPs from Broward County Schools were submitted to the Florida Positive Behavior Support (PBS) Project for the purpose of evaluating technical adequacy. The FBAs and BIPs were evaluated using the *FBA/BIP Technical Adequacy*

*Evaluation\**. This evaluation is based on the essential components identified in the research literature that comprise a technically adequate FBA and BIP. The evaluation instrument has been reviewed by three national experts who provided input that led to this version.

The FBAs included more components associated with technical adequacy than did the BIPs. Although the FBAs were a relative strength, the average FBA subscale was 43 percent (standard deviation of the mean (*SD*) = 0.14) while the average BIP percentage score of the group was 27 percent (*SD* = 0.07). The *Broward County Schools FBA/BIP Technical Adequacy Report* is included in the Appendix.

The following results reflect the data collected through the activities of the on-site monitoring as well as commendations, concerns, recommendations, findings of noncompliance and corrective action.

## **Strengths**

Throughout all four schools that were visited, there was consistency in ensuring that staff members who implement restraint and seclusion have received the training designated by the district.

In addition, specific strengths noted in the various schools include the following:

- Cross Creek School
  - All students had point sheets and used self-advocacy skills, as they were responsible for their own point sheet.
  - Positive relationships between staff and students are developed through positive conferencing between student and staff before an incident occurs.
  - In an effort for the teachers and students to maintain a positive and nonaggressive relationship, teachers are not permitted to implement restraint.
  - Bus drivers of the students served at this school were all trained to deal with the students' needs.
  - Students demonstrated awareness of their own de-escalation strategies.
- Whispering Pines School
  - The principal realized that the staff involved directly or indirectly in incidents of restraint or seclusion may need debriefing, and he took the time to debrief with these individuals.
  - Level systems are used for all students. If a student demonstrates inappropriate behavior, the student is not penalized by the loss of a level, but the student's level is frozen and can only increase once the student gets back on track with demonstrating better behavior.
  - Hands-on instruction was being used to help keep students engaged.
  - The school has a psychiatrist on-site who communicates with the students' outside psychiatrists.

\*Iovannone, R., Christiansen, K., & Kincaid, D. (2010). *FBA/BIP technical adequacy evaluation*. Manuscript in preparation.

- Positive conferencing between student and staff is used to develop positive relationships before an incident occurs.
- Henderson Mental Health, which is a community service provider, is housed on campus to provide case management, wrap-around services and family counseling.
- Riverside Elementary School
  - Administration has made personnel changes in an effort to support students' needs.
  - The low student-to-adult ratio allowed more one-on-one support for the students, which helped decrease disruptive behaviors.
- Pompano Beach Elementary School
  - Level and point systems were displayed to remind students of their current status.
  - Positive behavioral support was provided through the use of Pelican Bucks and pivot praise as integral parts of the daily routine.
  - The staff seemed to have knowledge of all students' behaviors and triggers. This knowledge helped the staff better support the students.
  - School staff noted that the reconfiguration of classrooms according to student needs had helped to decrease classroom disruptions.
  - Nature walks were used as a de-escalation strategy.

## Concerns

Concerns were noted in the various schools as follows:

- Cross Creek School
  - Communication notes that were used to document communication between the school staff and the parent or guardian of a student who was involved in several incidents of restraint or seclusion were unclear about which specific incident was being referenced.
- Whispering Pines School
  - The classroom mats used during a restraint incident were very hard.
- Riverside Elementary School
  - It appeared that single incidents may be being reported as several occurrences.
- Pompano Beach Elementary School
  - Some incidents were being reported as multiple incidents rather than being reported as a single, continuous incident.

## Recommendations

Recommendations for the schools visited include the following:

- Cross Creek School
  - Communication notes from school staff to parents need to clearly indicate each incident for the student.
- Whispering Pines School
  - It may be beneficial to have mats that are softer to absorb the pressure that could be involved during an incident.
- Riverside Elementary School
  - The district should review incident reports to determine whether single incidents of restraint or seclusion are being reported as several separate occurrences. If over-reporting is noted, the district should modify staff training accordingly.
- Pompano Beach Elementary School
  - The district should review incident reports to determine whether single incidents of restraint or seclusion are being reported as several separate occurrences. If over-reporting is noted, the district should modify staff training accordingly.

## Findings of Noncompliance

Bureau staff members identified six incidents of noncompliance on a total of five standards in two of the case studies. Identifying information regarding the two students reflecting the findings of noncompliance was provided to the Broward County School District prior to the dissemination of this report.

Standard/Identified Noncompliance	Supporting Data
<p>The parent or guardian was provided with a notification in writing of any incident of restraint or seclusion. The notification included the type of restraint used and any injuries occurring during or resulting from the incident. (Section 1003.573(1)(c), F.S.)</p> <p>Notification in writing of any incident of restraint or seclusion was provided to the parent or guardian before the end of the day on which the restraint or seclusion occurred. (Section 1003.573(1)(c), F.S.)</p>	<p>For one of the case study students (Pompano Beach Elementary School), the documentation for a restraint incident did not include verification that same-day written notification of the incident was provided to the parent on the same day as the incident.</p>
<p>Reasonable efforts were made to contact the parent or guardian via telephone or email on the day of the incident of restraint or seclusion. (Section 1003.573(1)(c), F.S)</p>	<p>For one of the case study students (Whispering Pines Elementary School), the documentation for a restraint incident did not include verification of reasonable efforts to contact the parent or guardian by telephone or email on the day of the incident.</p>

<b>Standard/Identified Noncompliance</b>	<b>Supporting Data</b>
<p>The school has documentation of the parent's or guardian's signed acknowledgement of the same-day notice or a minimum of two attempts to obtain written acknowledgment when the parent or guardian failed to respond to the initial notification. (Section 1003.573(1)(c), F.S.)</p>	<p>For one of the case study students (Pompano Beach Elementary School), the documentation for a restraint incident did not include the parent's signed acknowledgement of receipt of same-day notification or a minimum of two attempts to obtain written acknowledgement.</p>
<p>The parent or guardian was provided with a completed written report by mail within three school days of any incident of restraint or seclusion. (Section 1003.573(1)(d), F.S.)</p>	<p>For two of the case study students (one at Whispering Pines Elementary School and one at Pompano Beach Elementary School), the documentation for a restraint incident did not include verification that the incident report was provided to the parent within three school days of the incident.</p>

### **Corrective Action**

In an April 19, 2013, letter to the Broward County School District providing student-specific information, the bureau required that **no later than June 18, 2013**, the district must identify the policy, procedure or practice that caused the noncompliance related to the reporting of restraint and seclusion and provide evidence of the action taken to ensure future compliance. The district provided the required documentation on August 13, 2013.

In addition, no later than one year from the date of the letter (April 19, 2014), the district must demonstrate correct implementation of the standards identified as noncompliant during the on-site visit. A sampling process is described on the *Exceptional Student Education Compliance Manual* accessible at <http://www.fldoe.org/ese/pdf/m-compli.pdf>.

### Additional Findings of Noncompliance Related to Residential School Student

In addition to the findings of noncompliance related to the Broward County School District on-site visit, the following noncompliance was identified for a district student attending a residential school:

Standard/Identified Noncompliance	Supporting Data
<p>The parent or guardian was provided with a notification in writing of any incident of restraint or seclusion. (Section 1003.573(1)(c), F.S.)</p> <p>The notification included the type of restraint used and any injuries occurring during or resulting from the incident. (“District and School-Based Standards for Documenting, Reporting, and Monitoring the Use of Manual, Physical or Mechanical Restraint and Seclusion Developed by the FDOE”)</p>	<p>The same-day written notification did not include the type of restraint that was used in the incident.</p>
<p>General. As used in this part, the term individualized education program or IEP means a written statement for each child with a disability that is developed, reviewed, and revised in a meeting in accordance with Sec. 300.320 through 300.324, and that must include--... (ii) For children with disabilities who take alternate assessments aligned to alternate achievement standards, a description of benchmarks or short-term objectives... (34 CFR §300.320)</p>	<p>Short-term objectives were not included for all of the student’s annual goals. These were required because the student takes an alternate assessment aligned to access points instruction.</p>

### Corrective Action Related to Residential School Student

Prior to the bureau’s July 9, 2013, formal notification to the residential school, the same-day notification form was revised to ensure future compliance with the restraint and seclusion standard in question. In addition, the student’s IEP team met on June 27, 2013, and developed a compliant IEP which included short-term objectives. No further student-specific corrective action is required for the noncompliance identified during the on-site visit to the residential school.

However, **no later than one year from the date of the letter** (July 9, 2014), the Broward County School District and the residential school must collaborate to demonstrate correct implementation of the standards identified as noncompliant during the on-site visit. A sampling process is described on the *Exceptional Student Education Compliance Manual* accessible at <http://www.fldoe.org/ese/pdf/m-compli.pdf>.

## Technical Assistance

*Implementing a Multi-Tiered System of Support for Behavior: Recommended Practices for School and District Leaders* (Florida's Positive Behavior Support Project) may be accessed at [http://flpbs.fmhi.usf.edu/pdfs/RTIB%20Guide%20101811\\_final.pdf](http://flpbs.fmhi.usf.edu/pdfs/RTIB%20Guide%20101811_final.pdf) and provides an overview of the critical components of a multi-tiered system of support for behavior. These critical components point to systems changes that are necessary for a results-driven ESE system. The *FBA/BIP Technical Adequacy Evaluation* (Iovannone, Christiansen, & Kincaid, 2010) was provided to Florida school districts via email on April 11, 2013, and may be used in the development of FBAs and BIPs to ensure the inclusion of the essential components for technical adequacy. Information regarding the establishment of school-based mental health services and training related to trauma-informed care may be accessed by contacting the Region 10 – Ft. Lauderdale office of SEDNET. The district's SP&P provides district- and school-based standards for documenting, reporting and monitoring the use of manual, physical or mechanical restraint and seclusion developed by the FDOE. In addition, the technical assistance paper entitled *Guidelines for the Use, Documentation, Reporting, and Monitoring of Restraint and Seclusion with Students with Disabilities*, dated October 14, 2011, offers specific information for guidance regarding restraint and seclusion.

### Bureau and SEDNET Contacts

The following is a partial list of staff available for technical assistance:

***Dispute Resolution and Monitoring***  
850-245-0476

Lindsey Granger, Program Director  
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**Florida Department of Education  
Bureau of Exceptional Education and Student Services**

**Glossary of Acronyms and Abbreviations**

Bureau	Bureau of Exceptional Education and Student Services
BIP	Behavioral intervention plan
CFR	Code of Federal Regulations
ESE	Exceptional student education
FDOE	Florida Department of Education
F.S.	Florida Statutes
FBA	Functional behavior assessment
GSW	General Supervision Website
IDEA	Individuals with Disabilities Education Act
IEP	Individual educational plan
PBIP	Positive Behavioral Intervention Plan
PBS	Positive Behavior Support
PCM	Professional Crisis Management
PSASSS	Positive Behavioral and Academic Strategies for Student Success
<i>SD</i>	Standard deviation
SEDNET	Multiagency Network for Students with Emotional/Behavioral Disabilities
SP&P	Exceptional Student Education Policies and Procedures

## **Appendix**

### **Broward County Schools FBA/BIP Technical Adequacy Report**

## **Broward County Schools FBA/BIP Technical Adequacy Report**

Ten completed functional behavior assessments (FBAs) and behavior intervention plans (BIPs) products from Broward County Schools were submitted by the Florida Department of Education to the Florida PBS Project and the Interdisciplinary Center for Evaluation and Intervention, a FDLRS multi-disciplinary specialized clinic, for the purpose of evaluating their inclusion of FBA/BIP components for technical adequacy. The products were evaluated using the *FBA/BIP Technical Adequacy Evaluation\** (Iovannone, Christiansen, & Kincaid, 2010). The evaluation tool includes the essential components identified in the research literature that comprise a technically adequate FBA/BIP. Three national experts have reviewed the tool and the final version used for the Broward County evaluation incorporates the input received.

The evaluation tool includes a total of 18 items, nine related to the required FBA components and nine related to the required BIP components. Individual item scores range from 0–2 with a 0 indicating that the component is absent, a 1 indicating that the component is partially present and a 2 indicating that the component is present and complete. The maximum raw score for each subscale section is 18, with a maximum total scale raw score of 36. Subscale scores for the two sections (FBA and BIP) represent the percentage of the total achieved by the product. Finally, the total score indicates the total percentage of both the FBA and BIP scales.

Two scorers evaluated the ten FBAs/BIPs submitted. One is a doctoral-level board certified behavior analyst who has a faculty position; the other is a graduate student in applied behavioral analysis (ABA) program who is a board certified assistant behavior analyst. Both individuals are supervised by University of South Florida faculty members who are board certified behavior analysts. Each individual scorer evaluated the products individually and then compared scores for inter-rater agreement. Disagreements were discussed and consensus was reached for each component score. Inter-rater agreement scores ranged between 81% and 92%, with a mean of 86%.

The graphs on pages 20–22 illustrate the scores of each product submitted for review. Each FBA/BIP was given a numerical code by the Florida Department of Education, and these were used as the identifiers. Table 1 on page 23 summarizes the mean scores of the N products by showing the mean raw score achieved for each of the 18 items and the mean FBA and BIP subscale percentage scores as well as the mean total percentage score. An examination of the graphs indicates that the FBAs had higher technical adequacy than did the BIPs. The average FBA subscale was 43% ( $SD = .14$ ), while the average BIP percentage score of the group was 27% ( $SD = .07$ ).

In evaluating the FBA/BIP technical adequacy outcomes, it does need to be noted that the ten FBAs/BIPs chosen by the Florida Department of Education for this evaluation were selected specifically due to their association with students who had

\*Iovannone, R., Christiansen, K., & Kincaid, D. (2010). *FBA/BIP technical adequacy evaluation*. Manuscript in preparation.

been restrained or secluded. Thus, these ten FBAs/BIPs may not be reflective of all the FBA/BIPs conducted by Broward County.

A summary of the outcomes of the ten FBAs/BIPs on each item is described below.

### *Functional Behavior Assessment Domain*

- FBA Item 1—Multiple sources used for FBA. The literature states that high-quality FBAs include information from all relevant persons who know the student well. For example, literature suggests that a minimum of three data sources should be used or triangulated in developing a hypothesis for the target behaviors. An example would be to review the FBA data from a teacher interview (source 1), a direct observation (source 2) and an interview with the student (source 3). By having multiple sources of data, the accuracy of the hypothesis is increased.

Most of the FBAs reviewed listed several people who appeared to provide information used in the documents. In some FBAs, direct observation methods were provided including scatterplots, ABC recordings and general observations. Several of the FBAs, however, appeared to only have one person (e.g., FBA/BIP #1b appeared to be done by the behavior analyst) providing the information or the information listed identified psychological histories of the student rather than methods that identified target behaviors and gathered specific information about the context under which the behaviors occurred and the consequences that typically followed target behaviors. Some FBAs appeared to use dated information for the FBA. For example, FBA #2b identified the primary data source as information from 2010.

FBA Item 2—Identifying and Operationalizing the Target Behavior(s). Identifying the behavior(s) that will be the focus of the FBA as well as clearly defining the behaviors so that they are measurable and observable allows for more accurate information on the conditions under which the behavior occurs and the consequences maintaining the behavior. In addition, a complete description allows for more accurate recording of progress monitoring data, both baseline and post-intervention.

Most of the FBAs identified specific target behaviors as the focus of the FBA. The definitions, however, were not always described in measureable and observable terms. One FBA (e.g., FBA #1c), identified a target behavior that was not the same behavior identified in the functional behavior hypothesis, making it unclear which behavior was the focus of the FBA.

- FBA Item 3—Baseline data collected on the problem behavior. Knowing the performance of problem behavior prior to intervening is necessary to determine the effectiveness of the BIP and monitor the student's response to intervention.

In addition, baseline data provide information to the team on the intensity, durability and frequency of the behavior problem.

Baseline data were reported on the FBAs for the problem behaviors. Most of the baseline data reported provided a summary of the occurrence of the problem behaviors and a time frame. Most did not specify how the data were collected; however, it was assumed that most used incident or episode reporting. In some FBAs, the baseline data reported occurred over a time frame that occurred more than a year prior to the submitted FBA/BIP date entered on the document (e.g., #1c–2011; #2b–2010). Given that behavior is contextual, it is important to gather data related to the target behaviors relatively close to the FBA (e.g., within 30 days).

- FBA Item 4—Setting events. Setting events (distal conditions and/or environmental conditions that, when in existence, result in a higher likelihood of problem behavior occurring after presentation of an immediate antecedent), when present, are important to understand the student’s problem behavior and to develop effective interventions. Establishing a pattern of behavior that occurs when setting events are present allows the team to develop interventions that can modify the immediate antecedents so that problem behavior is effectively prevented.

Not all of the FBAs considered potential setting events. While not all behaviors have setting events that trigger a higher likelihood of problem behaviors, it was difficult to determine whether omission of setting events meant there were no events or if the team failed to address it. The majority of the FBAs listed events that could have been setting events (e.g., medication issues), but failed to show a pattern. At times, the information that could possibly be considered as setting events were found embedded within narratives describing psychological or family history but were not referenced again throughout the FBA/BIP. The evaluators provided partial credit for mention of these circumstances. To receive full credit, a clear pattern of how the event sets the stage for problem behavior to occur when an immediate antecedent is presented would need to be documented.

- FBA Item 5—Antecedents predicting problem behavior. Events present in the environment prior to performance of problem behavior is vital for developing a comprehensive behavior intervention plan. Through identification of a pattern of events that predict occurrences of target behavior(s), interventions can be developed to modify the antecedent events so that problem behavior will be prevented.

The FBAs provided did not have a clear section in which they reported antecedents that presented with problem behaviors. Most of the antecedents were found in the hypothesis statement or within narratives related to psychological or family issues, and the reviewers were not always able to confirm how the antecedents identified in the hypothesis were identified. Most of the

antecedents listed in the hypotheses were valid but lacking detailed information that would lead to more effective interventions. For example, a common antecedent on most of the FBAs was presentation of a non-preferred activity; however, none of the FBAs listing this antecedent provided further detail that described the nature of the non-preferred tasks (e.g., academic tasks involving writing, reading tasks, tasks requiring independent work). Some FBAs provided non-observable events as antecedents (e.g., when student is upset with people—#1b, given a directive she is unable to comply with—#1c; perceives he has been wronged—#3a). One FBA (#4b) provided an antecedent for a problem behavior that was not identified and defined as the target behavior (e.g., “another student says something that is misconstrued or bumps into him accidentally” identified as an antecedent for “verbal retaliation and pushing,” but target behavior identified for FBA was “leaving assigned area”).

- FBA Item 6—Antecedents present in the absence of problem behavior. Knowing the antecedents that predict problem behavior occurrence is essential. However, it is equally important to know what contextual circumstances predict and trigger appropriate behavior or the absence of the problem behavior. By reviewing and comparing the environmental events that are present when problem behaviors as well as appropriate behaviors are occurring, the team can be more confident in their development of a hypothesis that will be more accurate and lead to more effective interventions.

None of the FBAs submitted addressed circumstances and contexts in which the students did not perform problem behaviors.

- FBA Item 7—Consequences immediately following problem behavior. Consequences, or the responses others perform immediately after the occurrence of problem behavior, allow the team to determine the possible functions that are maintaining behaviors as well as the efficiency and effectiveness of the behavior obtaining the “payoff.”

Most of the FBAs did not provide information on the immediate responses of others (adults, peers) that followed problem behavior. Some of the information was gleaned through narrative descriptions of history and psychological background. When provided, it lacked details (e.g., adults search for student when student leaves assigned area) that would allow a team to determine the function or payoff that the student accesses with the problem behavior.

- FBA Item 8—Hypotheses components. An FBA-derived hypothesis drives behavior interventions and should include a summary statement that describes three components. Component 1 includes the antecedents or contextual events (i.e., setting events and immediate triggers) predicting the problem behavior, component 2 includes the behavior that was the focus of the FBA and component 3 suggests the function or purpose of the behavior that was

determined by the consequences typically following the targeted problem behavior.

Most of the FBAs provided a hypothesis that included antecedents, focus behavior and a function. It was difficult to determine linkage of the hypothesis back to the FBA data given that the method of reporting the results did not allow for consistent or clear identification of antecedents and consequences related to the problem behavior.

- FBA Item 9—Function is supported by the research literature and linked to FBA data. Functional behaviors are those that operate (i.e., get to or away from) on the environment and result in a desired outcome or payoff. Functions of behavior, in keeping with ABA principles, are observable and measurable and provide information on how the student's behavior is related to the context in which it occurs. The function then drives intervention development that will increase appropriate replacement behaviors and decrease problem behaviors by altering environmental events (e.g., providing the same outcome that the problem behavior achieved to the appropriate replacement behavior).

The majority of the FBAs provided a function that was observable and acknowledged in the literature (e.g., escape/avoid/delay or obtain/get). Some FBAs did identify control as a function; however, if they also included a valid function, they received credit. It was difficult to confirm the functions with the FBA data due to the lack of information related to the immediate consequences that typically followed problem behavior.

#### *Behavior Intervention Plan Domain*

- BIP item 10—Dates of FBA and BIP are within 30 days. When behavior is interfering with academic performance, it is imperative that there is minimal delay in developing the BIP after the FBA is completed.

Most of the BIPs appeared to occur within a short time after the FBA. However, the dates provided on the forms were confusing. IEP dates were recorded as well as initiation dates, some of which were dated several years prior to the current form, and finalization dates. For example, FBA 1a provided the following dates: Date initialized 10/5/12; date finalized 3/19/13; date of BIP 3/19/13; initial BIP 8/24/09). In some cases, the FBA dates within the FBA section of the form occurred after the finalization date recorded on the document, but no further information was provided on how this information was used to either modify or not modify the plan (e.g., FBA #1b provided FBA FAST date of 11/18/12, but date of IEP in which information was reviewed was 11/13/12).

- BIP Item 11—The FBA hypothesis is referenced. The primary purpose of conducting the FBA is to build the BIP from the hypothesis. It should be clear that the intervention strategies described on the BIP are linked to the hypothesis.

None of the BIPs referenced or included the hypothesis in the plan. Partial credit was provided to the documents due to the continuous nature of the forms (e.g., continuous numbering of pages); however, in reviewing the interventions included on the plan, it was unclear how the hypothesis was used in each case to build the plan.

- BIP Item 12—Prevention strategies are present, described completely and linked to FBA. The primary reason for developing multi-component hypotheses and behavior intervention plans is to make the problem behavior irrelevant, ineffective and inefficient. This can occur when interventions are described that modify the contextual events or antecedents so that these events are no longer “triggers” for problem behavior occurrence. By preventing problem behaviors from being performed, more opportunities are available to instruct students on use of replacement behaviors and to provide reinforcement for engaging in replacement skills.

The forms submitted provided a section titled “Proactive Strategies.” All of the BIPs submitted provided strategies within the designated areas. However, most were considered “stock, hierarchical lists” that did not include the level of detail necessary that would enable any adult to consistently implement the strategies listed. Further, it was not clear how most of the strategies listed linked back to the “when” part of the hypothesis so that the context would be modified making problem behavior irrelevant. Most strategies were general that would not have required an FBA to develop (e.g., model hand raising, verbally cue class, maintain close proximity). One FBA (#1b) provided a description of the residential structure within the Proactive Strategy section rather than individualized interventions addressing the antecedents. For each page of the BIP, this description was copied verbatim and placed in the Proactive Strategy section.

- BIP Item 13—Inclusion of a replacement behavior strategy, described completely and linked to the FBA. Behavior is a skill to be taught, similar to academics. By identifying a replacement behavior that the team would prefer to see the student perform rather than the problem behavior, a plan can be developed to carefully describe how to teach the skill by modeling, providing guided practice and feedback and providing ample opportunities for the student to perform the skill and get reinforced. The replacement behavior can be either a communicative functional behavior (i.e., a behavior that directly communicates the function included in the hypothesis, such as asking for escape/break or asking for attention) or a physically incompatible behavior (i.e., a behavior that is pro-social or desired, such as raising hand, being academically engaged with assignments, making positive comments, etc.). When selecting a replacement behavior, the team will give consideration to whether the behavior is one that can be performed as easily as the problem behavior and result in the same outcome.

While most of the BIPs provided replacement behaviors to be taught, the detail necessary to ensure consistent implementation of the intervention was not

included. Several of the replacement behavior intervention descriptions only provided the name of the replacement behavior (e.g., “social skills,” “communication skills”) and identified the behaviors that would be included within the name (e.g., “respect appropriate boundaries” for “social skills”), but no further information on how the skill would be taught by the teacher or staff to the student. A couple of BIPs identified functional communicative replacement behaviors (e.g., “ask for a break,” “ask for a chill-out,” “raise hand for help”), all potentially effective and efficient replacement behaviors to obtain the function (i.e., escape, attention). Providing explicit details that would list when the skill/behavior would be prompted/taught, how it would be taught initially including what the teacher will say and do during instruction, how the teacher will prompt/cue the student to use the replacement behavior rather than the problem behavior and how the replacement behavior will be more efficient at obtaining the outcomes would enhance the likelihood that the strategy would be implemented.

- BIP Item 14—Inclusion of a reinforcement of replacement behavior strategy, described completely and linked to the FBA. The notion of functional equivalence (i.e., the replacement behavior being taught must be reinforced with the same outcome that was achieved by the problem behavior) is important in making sure that the student will use the new, appropriate skill as a replacement for the old problem behavior.

Most of the BIPs did not provide sufficient detail on how the replacement behavior identified in the plan would result in the function (escape/avoid/delay or obtain/get). Many of the BIPs listed tangibles or other reinforcement that was not related to the function of the problem behavior. The most common reinforcement strategy listed on several BIPs was earning points or tokens that could be traded in weekly for preferred activities. Given that problem behaviors most likely result in the outcome relatively efficiently (within minutes, or at a minimum, within a short time frame), developing a reinforcement intervention that requires a student to wait a week for the desired outcome renders the new replacement behavior as much less efficient than the problem behavior and may result in the student reverting back to the original target behavior.

- BIP Item 15—Discontinue reinforcement of the problem behavior strategy. An effective behavior intervention plan addresses how others will respond to problem behavior in way that will no longer allow problem behavior to get the hypothesized function. Instead, the replacement behavior will be the primary way to effectively and efficiently get the outcome.

Only one BIP (#1c) addressed how adults would change their response to problem behavior so that the student no longer obtained the outcome. No other BIP addressed this issue outside of a crisis plan.

- BIP Item 16—Crisis plan (if applicable). If a problem behavior is intense, it is important for a crisis plan to be considered and included, if applicable. The

information from the FBA should help the team develop an individualized crisis plan that considers the student's hypothesized function as well as determine how best to prevent the behavior from reaching crisis plan levels and how to deescalate the behavior so that stability is achieved more quickly and effectively. The crisis plan should include operational definitions of behavior(s) that would be considered at a crisis level and would initiate the crisis plan implementation. Finally, the crisis plan should carefully consider how to avoid becoming the primary mechanism for the student to achieve the payoff for behavior. For example, if the hypothesized behavior is escape from academic demands and the crisis plan includes extensive time-out procedures, the student will have obtained the functional reinforcement by engaging in intensive levels of problem behaviors.

Most of the BIPs (i.e., 80%) identified a need for a crisis plan. BIPs #1b and #2c provided sufficient detail for consistent implementation of the plan. The others provided general statement such as "certified personnel will engage in non-physical and physical interventions." In these BIPs, it was not clear when the crisis plan would be used or what the physical and non-physical interventions would include and when each would be necessary.

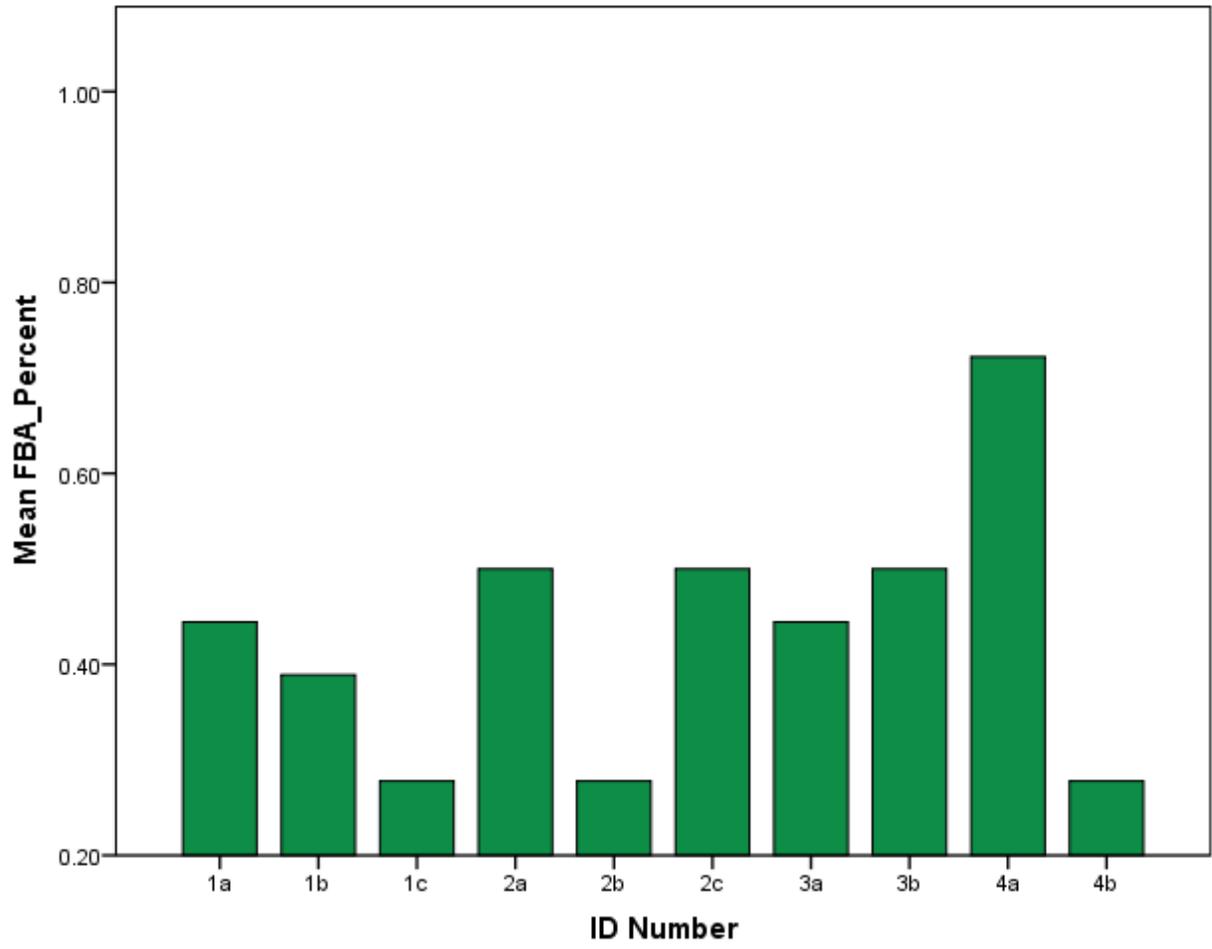
- BIP Item 17—Inclusion of plan for post-intervention data. Once a behavior plan is developed, it needs to be consistently monitored and reviewed. At a minimum, the team should determine the data they will collect to determine the plan's effectiveness. This includes student outcome data as well as fidelity data. This specific item evaluates whether the FBA/BIP provides a specific method for determining the data to be collected as well as the date for review.

Most of the BIPs provided information related to how the plan would be evaluated; however, there was minimal detail included. Most only provided information related to the frequency of data collection (e.g., "daily") and who would be responsible (teacher, behavior analyst). Some also included the methods which primarily consisted of "FBA tracking sheets" and "point sheets." Only one BIP (#1b) provided follow-up dates for review.

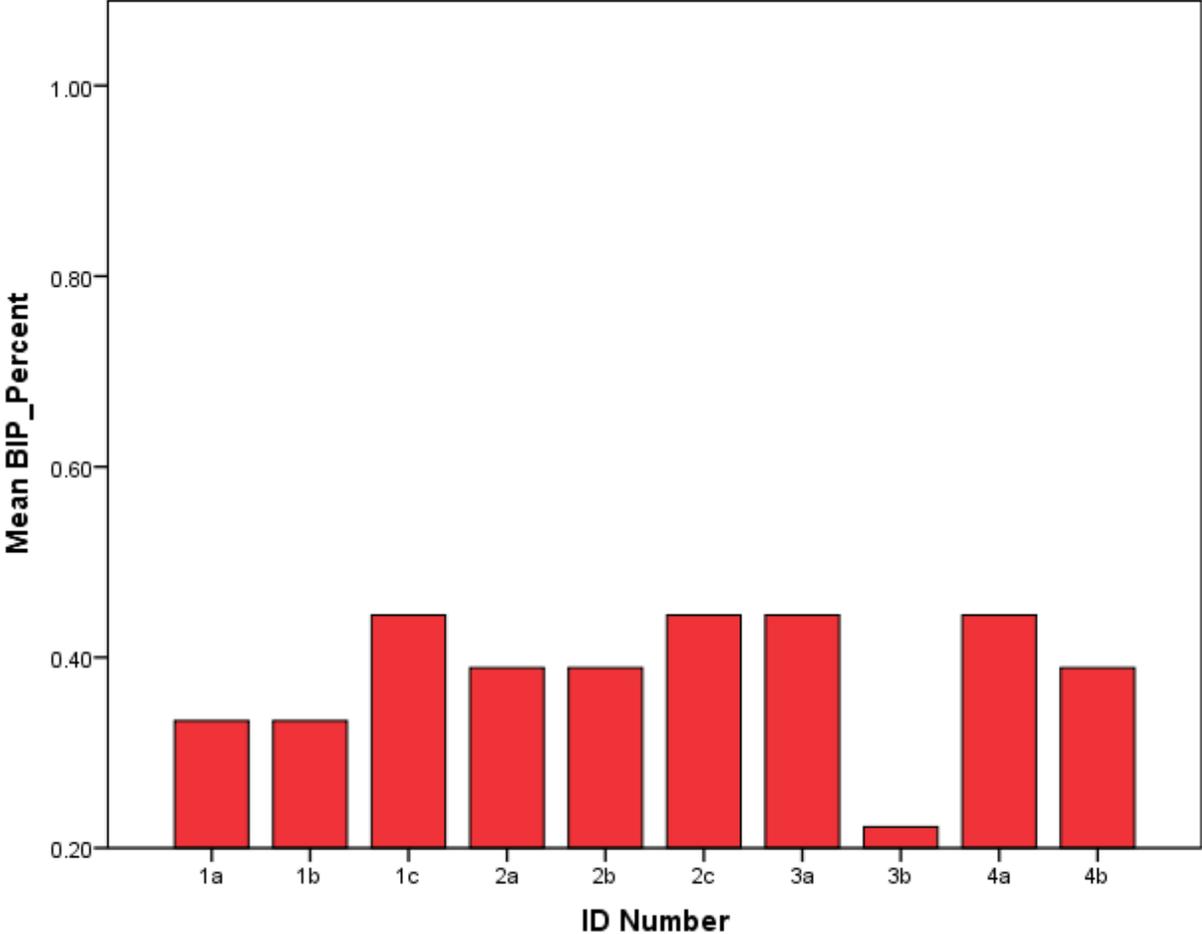
- BIP Item 18—Inclusion of a plan for collecting fidelity of implementation. When making data-based decisions on a student's response to intervention, it is imperative that the team knows whether the plan was implemented as intended.

None of the BIPs provided a plan for evaluating the fidelity of intervention implementation. One BIP included a statement that the BIP would be implemented, but no further details were provided that described how often fidelity would be measured, the method to be used (e.g., observation, self-assessment), who would measure it and when the data would be reviewed.

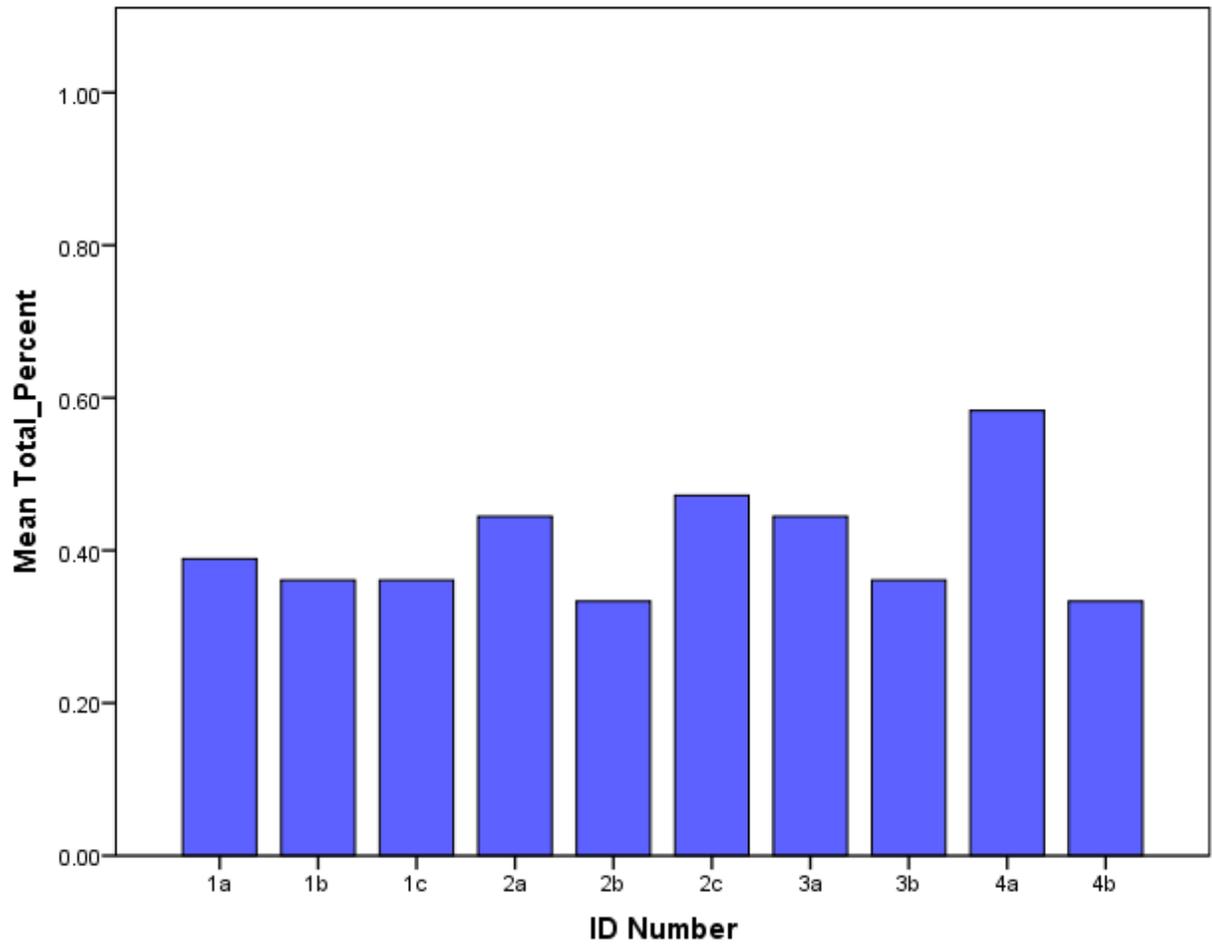
**Broward FBA Technical Adequacy Percentage Scores by ID**



Broward County BIP Technical Adequacy Percentage by ID



**Broward County Total FBA/BIP Technical Adequacy Percentage by ID**



**Table 1: Broward County Mean Raw Scores of Technical Adequacy Items**

Item	N	Mean Raw Score (max = 2.0)	Standard Deviation
<b>FBA</b>			
Item 1–Sources of FBA	10	1.30	.82
Item 2–Operational Definition	10	1.30	.48
Item 3–Baseline Data	10	1.10	.74
Item 4–Setting Events	10	0.50	.53
Item 5–Antecedents/problem behavior	10	0.90	.32
Item 6–Antecedents/appropriate behavior	10	0.00	.00
Item 7–Consequences	10	0.50	.71
Item 8–Hypothesis components	10	1.10	.32
Item 9–Function is observable and measurable	10	1.10	.57
<b>BIP</b>			
Item 1–Timeline between FBA/BIP	10	1.00	.94
Item 2–FBA hypothesis referenced	10	2.00	.00
Item 3–Prevention strategy/link	10	0.30	.48
Item 4–Replacement behavior strategy/link	10	0.80	.42
Item 5–Reinforce new behavior strategy/link	10	0.60	.52
Item 6–Discontinue reinforcing problem behavior	10	0.10	.32
Item 7–Crisis plan need considered	10	1.00	.67
Item 8–Monitoring/evaluating data plan	10	1.10	.32
Item 9–Fidelity/support plan	10	0.00	.00
<b>Total Scales</b>		<b>Mean Percentage</b>	<b>Standard Deviation</b>
FBA domain	10	43%	.14
BIP domain	10	38%	.07
Total domain	10	41%	.08



**Florida Department of Education**  
*Pam Stewart, Commissioner*

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