



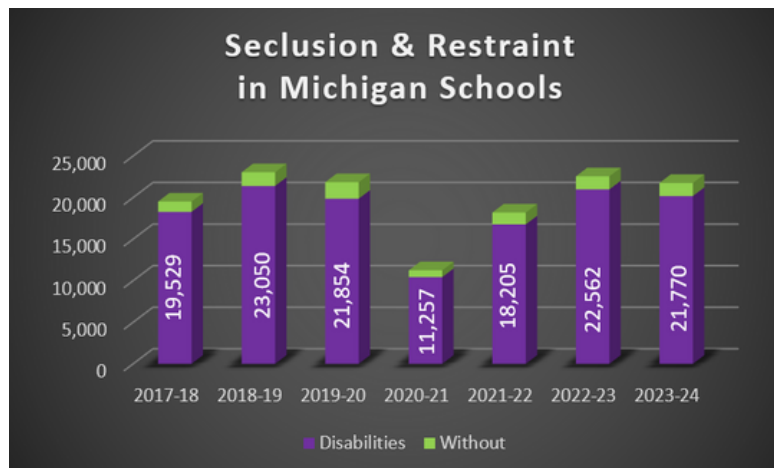
Proposal

Do No Harm Project

Building a system of accountability in Michigan to address the tactics of seclusion and restraint in Michigan's education system.

INTRODUCTION

Many school systems in Michigan use seclusion and restraint to manage challenging behaviors exhibited by students. Seclusion and restraint are two tactics that involve the **involuntary isolation** and/or **forced immobilization** of all or part of a child's body. Typically, students are placed in padded rooms that have doors with windows for observation. Educators receive training to use specific restraint holds that they are told are "safe."



All data is from mischooldata.org/districtschool-data-files Michigan's Center for Educational Performance and Information, Use of Seclusion and Restraint: ISD School Year Totals from multiple years (accessed August 28, 2024).

Seclusion and restraint are used excessively throughout Michigan's educational system. Michigan schools reported secluding and restraining 2,921 students 21,770 times last school year (2023-24) alone. That means that these tactics are used an average of 120 times a day throughout the state, based on an 180 day school year. As a result of the **extremely high rates** of seclusion and restraint in Michigan and personal experiences with the harm caused by the tactics, a parent and persons with lived experiences organization; Michigan Advocates to End Seclusion and Restraint (EndSaR) formed and is proposing this **Do No Harm Project**.

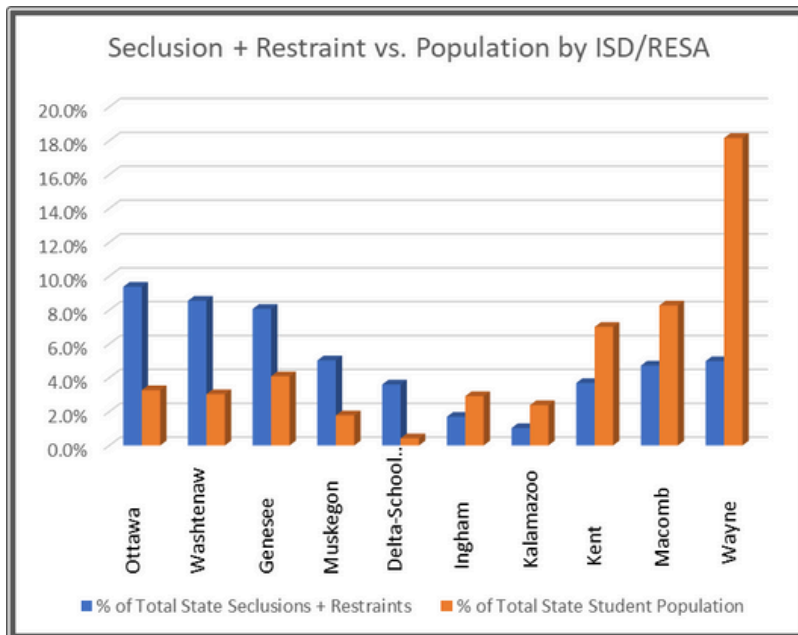
Seclusion and restraint are **dangerous and traumatic** practices that can have very serious consequences, **including death**. Not only is there **no evidence that they are effective** in reducing problem behaviors, but there is evidence of **deteriorated student-teacher relationships, increased behavior problems**, and they can be a **denial of a Free Appropriate Public Education (FAPE)**. Repeated use of seclusion and restraint should be viewed as strong evidence of **treatment failure**. U.S. Secretary of Education, **Miguel Cardona** wrote, "The use of

Do No Harm Project Proposal

restraint and seclusion practices is inconsistent with our shared goal to ensure every child is treated with dignity and free from abuse.” Seclusion rooms are **given misleading names** such as “calm down room,” “reset room,” “red zone,” or the “center,” so parents often don’t have the opportunity to understand the gravity of their child’s experience.

After a brief decline during the pandemic, seclusions and restraints were back on the rise in Michigan during the 2022-23 school year when there were 12,552 reported seclusions (the highest on record) and 10,010 restraints for a total of 22,562. In the 2023-2024 school year the numbers remained high with a total of 21,770 incidents. Over **93% of seclusions and restraints reported in Michigan are used on students with known disabilities**, meaning that the behaviors that led to the use of the tactics were likely a manifestation of their disability. It is difficult to say how many **could have been prevented** with proper accommodations and appropriate, individualized educational environments. It is important to remember that every incident represents a traumatic event for one of **Michigan’s most vulnerable children**.

Also concerning is that there are **clear discrepancies** either in how seclusion and restraint are used or how they are reported throughout the state. For example, in 2023-24 Wayne RESA educated 18.2% (259,642) of the state’s students, and they reported only 5.0% (1,084) of the state’s total seclusions and restraints. In contrast, Ottawa Area ISD educated only 3.3% (46,656) of the state’s students, yet they reported 9.4% (2,024) of the state’s total seclusions and restraints. Is there something that we can learn from how educators in Wayne RESA respond to emergency situations, or are they simply underreporting? Why are students in Ottawa Area ISD being secluded and restrained at higher rates than elsewhere in the state?



Seclusion and restraint data is from mischooldata.org/districtschool-data-files Michigan’s Center for Educational Performance and Information, Use of Seclusion and Restraint: ISD School Year Totals (accessed August 28, 2024) and student population is from mischooldata.org/compare-tool/ (accessed January, 2024).

Do No Harm Project Proposal

Perhaps most concerning of all is the **lack of oversight**. Delta-Schoolcraft ISD reported 95 seclusions and 488 restraints, a total of 583 seclusions and restraints of just 10 students. That means that those 10 children experienced an average of **over 58 seclusions or restraints each** during the 2023-24 school year. That is an average, meaning that for some students it was even more. The **Civil Rights Data Collection report** indicates that black and white boys are most disproportionately impacted by seclusion while black and Hispanic students are most disproportionately impacted by restraint. Because of the **lack of data transparency**, we are unable to know if or how Michigan students are disproportionately impacted by age, race, gender, or disability.

These data indicate that either these tactics are not being restricted only to “emergencies” or **schools lack the experience and resources necessary to prevent the emergency situations** that tend to lead to seclusion and restraint. Likely, both are true. Educators from across Michigan are asking for **greater clarity, stronger guidance, consistent training, cultural shifts, systemic change, and support** so that they can meet educator and student needs in their schools.

The **data on seclusion and restraint** are published quarterly by Michigan’s Center for Education Performance and Information (CEPI). CEPI was founded in 2000 by executive order to collect, manage, and report Michigan educational data. CEPI sits within Michigan’s Department of a division of the State Budget Office in the Michigan Department of Technology, Management & Budget. The data collected by CEPI, like other pupil-related information, is collected 3 times a school year through the Michigan Student Data System (MSDS). The data is structured by school districts and by Intermediate School Districts (ISDs). The data shows how many times each tactic has been used, how many students with disabilities have the tactics used on them, and how many students without disabilities have the tactics used on them. **There are no reported data, even summarized on state level, of students ages, race/ethnicities, gender identities, or type of disability** and no summary data on how long students are restrained and/or secluded.

Expanding the scope of publicly available data to include critical demographic information such as age, race/ethnicity, gender, and the specific type of disability, and length of time in seclusion or restraint is paramount in providing a comprehensive understanding of the seclusion and restraint practices in Michigan's schools. Releasing this additional data would allow a **deeper understanding of the nuanced aspects of this issue**. It would help identify potential disparities in the application of these practices, ensuring that no demographic group is disproportionately affected. Moreover, understanding the age and disability type of students involved can inform the development of more **tailored interventions and support systems**. By collecting and analyzing seclusion and restraint data, there could be stronger work towards not only eliminating seclusion and restraint practices but also promoting equity, inclusion, and the **holistic well-being of all students** in our educational system.

Do No Harm Project Proposal

Those familiar with children's issues know about the Kids Count project on a national level as well as the Kids Count in Michigan data project. This work, more than 40 years old, provides public data on a city, county, and state level regarding the well-being of children using publicly available datasets. Prior to this initiative, advocates and policymakers had to "dig" through various public department records to understand the issues facing their communities' children and there was inconsistency in how the data was understood and reported. The Skillman foundation, through its first president, Leonard Smith, was principal in the funding the Kids Count work in Michigan and in funding Michigan's Children, a statewide non-partisan children's organization and the Michigan League for Public Policy.

The purpose of this funding was not only to produce "data books" with as much public data related to child well-being published in "one location" but also to provide training to policymakers and citizens on understanding the data and taking up the call to action to improve the well-being of children. Many initiatives and efforts have resulted from this public data set but of unique consideration was the 1995 publication of the very first **"Keeping Kids Alive"** report on preventing child deaths in Michigan. This report was published by the Michigan Public Health Institute and was one of many efforts of the then "young" institute that has its roots in "making public health data available" to all of us to improve the lives of Michigan's residents. Data makes a difference for change and is an important part of the Do No Harm project.

PROPOSED PROJECT

The Do No Harm project has three primary components. First is a monitoring, oversight, and technical assistance system that would be established at the state level. Second is the development of comprehensive training that demonstrates the impact of seclusion and restraint on students and staff and provides information on approved approaches and less restrictive interventions, as well as strategies for effective and supportive corrective action processes. Third is the data component which involves engaging 3-5 school districts who would develop and implement seclusion and restraint reduction plans and would provide "lessons learned" for the rest of the state's school systems and inform the oversight system.

Do No Harm Monitoring, Oversight and Technical Assistance System:

This state-level system would not only look at the current data that is collected through the Michigan Student Data System on Seclusion and restraint, but would also develop processes that would allow for other critical data points like age/gender/race/ethnicity to be included in an aggregated state level report. Further, this system would do the following:

- Produce virtual data training for school personnel on seclusion and restraint data;
- Real-time electronic reporting tool for schools to report seclusions and restraints; and,
- Electronic complaint form available online to parents, caregivers, and others for when there is concern about uses of seclusion and restraint with their children.

Comprehensive Training to be provided by the Do No Harm System:

It is crucial to provide comprehensive training to school staff, administrators, and relevant personnel on the harmful impact of seclusion and restraint tactics, as well as training about evidence-based behavioral support approaches that can prevent escalation, eliminating the need for these extreme tactics. Further, the wider community must have access to this training and parents and caregivers must also receive information about discipline and the use of seclusion and restraint in their child's educational settings.

- Virtual basic awareness training on seclusion, restraint, and approved approaches for all adults who work with children in schools, also available to the public for free.
- Parent document to be distributed to all parents and caregivers. This document would be based on the work already completed by the **Michigan Advocates to End Seclusion and Restraint (EndSar)** and **Michigan Alliance for Families**.
- Assembly of a team of experts for the development and publishing of a rubric for evaluating approaches and interventions that are supportive, effective, and less restrictive.
- Development and publishing of lists of approved approaches that are less restrictive and found to be effective in working with children in educational settings (i.e. Dr. Ross Greene's Collaborative and Proactive Solutions).
- Implementation of a statewide network of educator and caregiver support.
- Implementation of an effective and supportive corrective action process.

Do No Harm Pilot School Data Project:

The reduction of the use of Seclusion and Restraint in Michigan's educational settings requires more than just telling schools, "stop using it." Through the Do No Harm project, 3-5 school districts will be invited to work closely with the Do No Harm Project Team as they develop and implement seclusion and restraint reduction plans. In exchange for their commitment to change, transparency, contribution to the data project, and ongoing mentoring in the educator support network, schools will receive funding to aid in their transition. The data and personal experiences collected in this project will help inform the materials and processes developed by the Monitoring, Oversight and Technical Assistance System. Critical to these 3-5 school districts will be their willingness to share their experiences and to support others in changes that lead to not only a reduction in these tactics but also to the development of positive school cultures that make the school environment safe and supportive for everyone.

- A variety of districts will be invited, such as a low reporting district from Wayne RESA, a high reporting district in Ottawa Area ISD, and a rural high reporting district from the upper peninsula. The districts will represent a variety of students from different racial and socio-economic backgrounds. Participation will be voluntary.
- Districts will choose from evidence based approaches and will be reimbursed for physical building changes up to \$10,000, transition training and support materials up to \$10,000, and personnel up to \$80,000.

DO NO HARM PROJECT FUNDING SUMMARY

Project Team - 6 FTE	\$624,612
Indirect Costs	\$109,307
Pilot School Data Study	\$450,000
Implementation	\$325,388
Total Project Cost	\$1,509,307

PROJECT TEAM SALARIES AND WAGES

Title	Months	FTE	Total Salary
Director	12	1.0	\$116,248
Associate Director	12	1.0	\$95,584
Financial Analyst	12	1.0	\$79,675
Program Assist	12	1.0	\$51,552
Program Assist	12	1.0	\$51,552
Research Assist	12	1.0	\$56,032

Total Salary and Wages: \$450,643

FRINGE BENEFITS

Status	Description	Total Salary	Fringe %	Total Fringe
Full Time	30+ hours/week	\$450,643	0.3700	\$166,737

Total Fringe Benefits: \$166,737

Do No Harm Project Proposal

Travel		Supplies and Materials		Other Costs	
Description	Total	Description	Total	Description	Total
Professional Dev	\$1,903	Supplies - General	\$476	Dues and Memberships	\$476
National Training	\$3,500	Material Expenses	\$476	Phone/Communications	\$401
Total Travel	\$5,403	Total Supplies	\$952	Total Other Costs	\$877

PROJECT TEAM BUDGET SUMMARY

Category	Total
Total Salaries and Wages	\$450,643
Total Fringe Benefits	\$166,737
Total Travel	\$5,403
Total Supplies and Materials	\$952
Total Other costs	\$877
Total Direct Costs:	\$624,612
Indirect Cost @ 17.5%	\$109,307
Overall Project Team Total:	\$733,919

PILOT SCHOOL DATA PROJECT

Category	Reimburse	3-5 Schools	Total
Physical Building Changes	Up to \$10,000 each	x 4.5	\$45,000
<ul style="list-style-type: none"> • Voluntary Sensory Gyms • Voluntary Calming Spaces 			
Transition Plan Implementation	Up to \$10,000 each	x 4.5	\$45,000
<ul style="list-style-type: none"> • Training • Materials • Professional Support 			
Personnel	Up to \$80,000 each	x 4.5	\$360,000
<ul style="list-style-type: none"> • Behavior Specialists • Inclusion Experts • Occupational or Trauma Therapists 			
Pilot School Project Total:			\$450,000

IMPLEMENTATION

Category

Contracting for Development of Electronic Forms

Contracting Development of Virtual Training Modules

Contracting for Integration with Existing Systems

Contracting for Experts on Approaches

Implementation Total: \$325,388

BUDGET NARRATIVE

Salaries Total: \$450,643

- **Project Director: \$116,248**

The Project Director will be responsible for providing oversight of the project. She will commit 100% of her time to ensure the successful implementation of project outcomes and objectives.

- **Associate Director: \$95,584**

The Associate Director will assist the Project Director with overall project oversight by keeping the project on track with timelines, deliverables, and scheduling/ coordinating meetings. She will facilitate meetings, develop agendas, and maintain detailed records of team progress.

- **Financial Analyst: \$79,675**

The Financial Analyst will work closely with the Project Director to manage the project budget, track expenditures, manage reimbursements to schools, and provide financial reports. She will commit 100% of her time to the project.

- **Program Assistant: \$51,552 x 2**

The two Program Assistants will support project management, including coordinating meetings, maintaining timelines, and facilitating discussions. They will interface with pilot schools, experts, and stakeholders, compile information into tools such as rubrics, training content, form specifications, parent document, etc.

- **Research Assistant: \$56,032**

The Research Assistant will support all data collection efforts, including developing timelines, conducting literature reviews, coordinating research tasks, analyzing data, and drafting recommendations. They will also participate in creating specifications for the electronic reporting form and the state level data transparency and reports.

Fringe Benefits Total: \$166,737

Fringe benefits are calculated at the federally approved rate:

- 37% for full-time employees (\$166,737).

Fringe includes health insurance, dental insurance, vision insurance, life insurance, unemployment insurance, workers' compensation, and retirement.

Travel and Conferences Total: \$5,403

Professional Development: \$1,903

This covers training to maintain and enhance staff skills. Estimated at \$1.00 per hour.

National Training: \$3,500

Covers travel for staff to attend national training sessions essential to project implementation.

Supplies & Software Total: \$952

Supplies - General: \$476

General office supply costs are estimated at \$0.25 per hour, supporting daily project activities.

Software: \$476

Covers software and upgrades used daily by project staff.

Other Expenses Total: \$877

Dues & Memberships: \$476

Covers employee memberships that assist with professional development.

Telephone/Communications: \$401

Estimated at \$33.42 per month, this covers cell phones and desk phones for project staff.

Total Do No Harm Project Costs: \$1,509,307

Total Direct Costs (exclusive of contractual expenses) \$ 1,400,000

Indirect Costs Total: \$109,307

The federally approved indirect rate is typically 17.5% of all direct costs, excluding incorporated contractual expenses.

TOTAL FUNDS REQUESTED: \$1,509,307
