



**Hanover Special Education Parent Advisory Council ("SEPAC")
Final Report on ABA Programming Working Group to the School Committee
May 29, 2019**

Introduction

Last fall, the SEPAC Board (the "Board") voted to establish a working group to evaluate the delivery of services to students with autism in the district. Parents had raised concerns in SEPAC meetings regarding the quality and consistency of services and the need for a dedicated group to look at these issues was apparent. The following represents the final report and recommendations of the ABA Programming Working Group, which was reviewed with District staff on April 30, 2019 and has been modified to incorporate District feedback. The District has worked collaboratively with SEPAC throughout this process, including implementing changes in communication best practices this year. Although the District has made progress in recent years and has hired a number of dedicated staff, there are several key target areas the School Committee ought to monitor and require the District to report back on in the 2019-2020 school year. In sum, a number of concerns center on the lack of cohesiveness in planning, staffing, programming and program monitoring.

By way of background, the Hanover SEPAC is a self-governed organization formed under Massachusetts laws, whose primary role includes advising the school committee on special education matters. In support of that role, SEPAC created a new working group process this school year to assist the Board in reviewing matters that require additional scrutiny. The ABA Programming Working Group was the first group established under this new process. It was established at the October 26, 2018 monthly board meeting and the Board received reports from this group at its November 20, 2018 and March 29, 2019 meetings. The Board voted to approve this document and recommendations at its May 24, 2019 meeting, with one abstention.

As an initial matter, although the working group was originally titled ASD Programming, the bulk of the issues concern the delivery of "Applied Behavioral Analysis" or "ABA" services. In

general, ABA is a treatment based on behavior theories which, simply put, state that desired behaviors can be taught through a system of rewards and consequences. ABA applies behavior principles to behavioral goals, including social and academic goals, and carefully measures the results. Although ABA is often thought of as the gold standard in autism treatment, we want to be clear that ABA is a methodology that may be appropriate in some cases for students not on the autism spectrum; similarly, it is not always the case that a student challenged with autism would receive ABA services. Whether or not a student receives ABA services is an individual IEP team decision. For simplicity sake, we have decided to formerly change our working group to the ABA programming working group. That does not mean ASD Parent concerns are limited to ABA, just that this represents the scope of the final document. Also, although we refer to ASD students in multiple places below, many of those statements would equally apply to students that do not have ASD but receive ABA programming.

Parent Concerns and District Feedback (Italicized)

Parents with children receiving ABA supports have raised concerns with staffing of ABA tutors, frequently assigned to students with ASD. There have been overall concerns on notice, including parent/guardian notice when a new tutor is assigned to a student or when an ABA tutor is out sick or on vacation or reassigned to another student. Also, overall, there is an observation of high turnover rates. It is also not clear if the District has any best practices or guidance on whether or not an ABA tutor should be staffed 1:1 with an ASD student. It is not clear to Parents whether the District has any best practices on these topics or standards in place for the transfer of key information required for the continuity and overall knowledge of the student.

The District has reported that overall its ABA tutor and paraprofessional workforce is fairly stable, although they are always open to strategies to do even better and turnover rates can vary from year to year. These are often difficult positions to fill for a variety of reasons, which have been previously discussed with the working group and with the School Committee in the past. To quantify, our ABA turnover for 2018-2019 (staff who left during the year) is as follows:

HMS: 1 ABA tutor (moved away), HHS: 0, Cedar: 0, Center 2 ABA tutors (hired and resigned for other jobs), and 1 ABA tutor reassigned to the ASD program

Email communication is sent out regarding ABA staff if they are out for an extended absence, but there is no notice on a daily basis if there an absence due to a sick day. Absences for ABA tutors are handled the same as professional staff. The District did commit, however, to looking at this issue and whether best practices could be adopted for parents to be notified if their ABA tutor was not present that day, especially if that child already receives a daily communication log. At many, if not all, IEP or clinical meetings, staff has discussed the need to have more than

one ABA tutor know a student in the event of a long or short-term absence of a student. The District has worked closely with another SEPAC working group on communications this year, putting goals in place to notify parents of the staff assigned to their child before school starts. Both the District and SEPAC look forward to continuing those discussions.

Further, the working group researched job postings from the District and it appears there are inconsistencies across job titles and a formal set of criteria for ABA tutors is lacking. In some cases, only the bare minimum was needed to apply, which is concerning given that some of our students with ASD are the most vulnerable in the District. *The District has developed a more consistent job description and set of criteria in the application process. Job postings were made more detailed across the District this school year outlining qualifications. This has not yielded a stronger candidate pool yet.*

There appears to be inconsistency among the terms ABA tutor and paraprofessional and what is meant by both. The working group position is that ABA tutors implement and track data on ABA programs as dictated by the IEP and are key players in the delivery of ABA services. We believe there is a common understanding on this with the District. *The District has stated that there is a clearly understood difference within the school between ABA and paraprofessional staff and the roles each performs in regards to ABA, discreet trials and data collection. There are no specific examples of a paraprofessional being assigned as an ABA tutor for data tracking. The District expects ABA tutors to track data when required by the IEP. A certified RBT was assigned to the ASD program at Center School this spring. The District is open to evaluating the hiring of limited RBT certified staff as an option to support the ASD programs as they evolve, but not as a requirement at this time.* The working group recently heard that information and would like to keep that issue under review.

In addition, ABA tutors are also tasked with keeping many of these children safe including but not limited to de-escalating behaviors and identifying, reporting and awareness of bullying. The District should consider a higher certification for those providing ABA tutoring, such as the more recent Registered Behavior Technician Certification (“RBT”) program. ABA tutors should also receive crisis management training, bullying prevention, social pragmatics training with regard to bullying, and review of state laws on mandated reporting as well as school district policies and procedures in place to ensure the laws that are in place to address any instances of bullying are adhered to efficiently and expeditiously.

In response, the District has added that during early discussions with the working group, it was suggested that more specialized ABA training would be beneficial and the district agrees. In response, the District planned, and held, 3 separate trainings (11/13, 11/27, 12/4) led by the District’s BCBA to help build the ABA tutor’s capacity in the classroom. The plan for next fall is to have more trainings and opportunities for in class coaching of ABA techniques. Additionally,

most ABAs are trained in Crisis Prevention Institute methods (CPI), which is our crisis management training. Like all staff, they are required to be aware of anti-bullying laws and reporting procedures and this is reinforced each September. Most ABA and paraprofessional staff have been, or are planned for, training in PBS and PBIS (age appropriate positive behavior programming for all students). All staff is trained in active shooter and emergency protocols.

Parents have raised concerns in some of the elementary school programs that the ABA tutors are not directly reporting to the BCBA, but rather special education staff. There also appears to be a filter between ABA tutors and the BCBA, not allowing the BCBA the ability to properly train staff members that are carrying out programs. By way of comparison, a well-developed home ABA program would have supervision by a BCBA every week, with suggestions being made to the ABA tutor at home and appropriate oversight for the ABA tutor to achieve the optimal outcome for the student.

To put a finer point on this, an ABA tutor is not there just to make sure the ASD student is “complying with school policy” or “looking well-behaved in the classroom.” They are there to carry out all the programming recommended by the BCBA, which as an example can include work on joint attention to academic subjects to carrying on conversations with peers in the classroom. Some ASD students, particularly in the older grades, may not need ABA tutors nor programming during academic subjects, but they may need an ABA tutor for certain specialists or unstructured social periods to carry out programming. By elevating the role of ABA tutors and being deliberate with how those tutors are used, the District can better allocate resources and make sure that when an ABA tutor is assigned to an ASD student, they are there to work on programming.

In response to these concerns, the District has noted that this is not a one size fits all area and is certainly open for discussion and refinement, but it is a school level decision on the reporting structure for personnel. Ideally, ABAs should be reporting to the special education teacher and the BCBA as a team. The BCBA should have oversight of the programs, and observe and offer feedback on individual students to the ABA staff in partnership with the special education teacher and other service providers. This will help elevate the experiences for students. There is presently no filter or any limit for the BCBA to properly train staff at any level as requested or needed. With a full time BCBA on staff there will be more training and coaching opportunities.

In addition, Parents have raised several concerns with the delivery of ABA programs. To start, it is not clear if the District has a repository of programs that it can draw upon, developed over time for students in the District. Parents have asked at meetings why their child is or is not getting a program that another student a few years ago received and that may be suitable for their child. It should not be up to the Parent to request this, or to push for updated programs. Staff, including the BCBA, should have ready to go resources once a student has mastered a

certain target. That would save time for the BCBA, who does not need to create new programs all the time, but can simply tailor a program for the individual student. It is also not clear if the BCBA is always drafting programs – in some cases it was apparent to Parents that untrained special education staff was drafting programs, a task that should remain firmly with the BCBA.

The District has stated that this is an area where we can collaborate and strengthen services. We need to build and maintain a repository of programs and utilize a shared location where all of our student data for this population of students is kept to increase efficiency and more importantly to create a record of programming that was successful (or not) to serve each student as they grow academically, emotionally, and physically. This is an issue that needs to be addressed prior to the onboarding of a full time BCBA.

Next, tracking of data needs to be done on a regular basis so that the BCBA can quickly analyze data and be ready to make any changes or adjustments. The District should consider standardizing this data tracking in an electronic format. Parents have complained that it does not appear this data is being updated regularly or reviewed frequently enough, despite staff's best interests. Parents have mentioned that there often are times when a child has mastered a program and there is a lag time before new programs are done, which should not be case.

The District has reported that tracking of data needs to be improved overall as it is not consistently kept by special education staff, ABAs, or the BCBA in some case for a variety of reasons. This has been aggressively addressed since April vacation both in training with staff and updating program books and is a priority moving forward. The district has explored the use of electronic data tracking and presently finds the traditional methods more efficient for our staff, but that could change as technology evolves.

In closing, we believe it important to comment on these issues in light of the District's recent posting for a full-time BCBA. First, we commend the District for taking our feedback into consideration when developing that position's job description and we support the District taking the next step to increase the number of hours a BCBA will be able to devote in our schools. To be clear, however, a number of the issues raised in this document are not necessarily solved just by the hiring of a full-time BCBA. Any BCBA, contract or full-time employed with the District, still needs a backbone of technical and programmatic support.

Recommendations

1. The District should explore comparable districts in terms of students and percent of students with ASD and research their ABA program development, data tracking, monitoring and analyzing, as well as consider whether or not contracting with the New England Center for Children ("NECC") or similar institute as some other towns do would provide any value or efficiencies.

2. The District should adopt standards for the retention of ABA programs, i.e., a database of programs widely available to all, such that the BCBA(s) can readily access them and tailor the program to the individual student. This provides great efficiencies and ensures that all students are getting the same level of programming based on their existing and future needs.
3. The District should evaluate the adoption of electronic standards for the tracking and monitoring of ABA data so that information can be readily accessed and analyzed by the BCBA and programs can be updated quickly to meet student needs.
4. The District should continue to build hiring standards and/or job descriptions for ABA tutors consistent across all schools and should consider whether or not to mandate that all ABA tutors be Registered Behavior Technicians or be willing to become RBTs, taking into account the needs of the District, timing considerations, and grandfathering in certain highly qualified existing ABA tutors.
5. The District should develop a comprehensive training program for all ABA tutors. This training is three parts: (1) ABA practices and policies using the RBT task list as a guideline; (2) District-wide policies and procedures; and (3) District curriculums such as Social Thinking necessary to carry out programming. Training should be consistent throughout the academic year as a standard for the benefit of all ABA tutors including those hired outside of the start of the academic year. This training should include reviews of basic ABA practices and policies that the District establishes are paramount for the ABA Tutor to have the most effective and positive impact on the students day to day. The training should also include an overview of the crisis management plan for the District as well as explicit instruction for what the expectation is of the ABA tutor as it pertains to de-escalation should a crisis arise. An additional component of the recommended training should include bullying prevention and review of state laws on mandated reporting as well as school district policies and procedures in place to ensure that any instances of bullying are responded to efficiently and expeditiously.
6. The District should consider best practices that would allow appropriate guidance, mentorship and oversight support for the ABA tutors from the BCBA.

In order to carry out these recommendations, the School Committee may request that the District agree to report back on a periodic basis throughout the school year. The School Committee may also decide to convene a temporary task force for the purposes of looking at

these issues, which SEPAC stands ready and willing to be a part of and would recommend the School Committee designate its members.

Thank you for your attention and consideration to these issues.