

Restraint and Seclusion: A Review of Practices and Policy

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Abstract

Restraint and seclusion are frequently misused in schools, leading to harmful outcomes for students. There is currently no federal law regulating these practices, which has led to inconsistencies in state and district policy. This policy paper aims to provide a brief background on current definitions, case law, and policies and provide teachers and administrators with ways to advocate for updated laws and policies. Preventive solutions to problem behavior must be embedded into policies and regulations to ensure every student has access to a safe and equitable educational experience.

Keywords

restraint and seclusion, policy, practice

Misusing seclusion and restraint practices led to 79 child deaths between 1993 and 2018 (Nunno et al., 2022). The Office of Civil Rights (OCR) defines restraint as the “personal restriction that immobilizes or reduces the ability of a student to move his or her torso, arms, legs, or head freely” (U.S. Department of Education, 2012, p. 2), excluding physical escorts, but can include mechanical or medical restraints (U.S. Department of Education, 2012). OCR defines seclusion as “the involuntary confinement of a student alone in a room or area from which the student is physically prevented from leaving” (U.S. Department of Education, 2012, p. 6). These methods are more commonly found in mental health and correctional facilities, calling into question their use in educational settings (Al-Maraira & Hayajneh, 2019).

This article aims to provide explicit recommendations for evaluating policies and steps to advocate for reform at every level in the education system (i.e., federal, state, district, and school). First, a review of the outcomes of case law related to restraint and seclusion will be presented. Next, we will describe current restraint and seclusion laws at the federal, state, and local levels. Then, suggestions for school staff to advocate for alternative policies will be provided.

Many reported adverse outcomes are associated with using restraint and seclusion, including immediate health and safety concerns for students (National Disability Rights Network, 2009). To illustrate, from 2006 to 2018,

nine students died from asphyxia, two from suffocation, and others died as a result of cardiac arrhythmia, cardiac arrest, asphyxiation, dehydration, and aspiration (Nunno et al., 2022). Long-term adverse psychological effects can occur, especially among students with previous trauma inflicted by adults (e.g., depression, posttraumatic stress disorder, anxiety; Freeman et al., 2021; Kern et al., 2022). Gershoff and Bitensky (2007) found that mental health challenges in a sample of adults can be traced back to seclusion. Long-term behavioral effects include aggression and antisocial behaviors (Freeman et al., 2021).

In 2009, the National Disability Rights Network published a report titled *School is Not Supposed to Hurt*. This report was instrumental in raising awareness of harmful restraint and seclusion practices in schools. It included definitions, risks, a summary of inadequate legal protections, case summaries by state, and solutions. The case summaries presented were shocking. For example, in Hawaii:

Discovering bruises on her daughter’s hips, a mother contacted the school, where they admitted that the seven-year-old girl

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with developmental disabilities and deafness was frequently tied to her chair, her hearing device removed by school personnel because she would not stay in her seat. The bruises were caused by the strap used to tie the girl down. (National Disability Rights Network, 2009, p. 22)

The report's authors recommended banning seclusion and prone restraints in educational settings (i.e., a student being restrained face down on their stomach), in addition to only using restraint in situations where there was *immediate harm to the student or staff*. These solutions have been suggested by other scholars (Gagnon et al., 2021; Marx & Baker, 2017; Simonsen et al., 2014; Van Acker et al., 2021) but have yet to be included in federal law or are not consistently applied within many state and district policies and regulations.

Case Law

Harmful outcomes following educators' use of restraint and seclusion have been documented in case law. Between 2019 and 2021, seven circuit courts reviewed lower court decisions related to (a) appropriate use of restraints and seclusion, (b) qualified immunity and policy use of restraints, and (c) and lack of consistency of policy/procedures across jurisdictions (Carlson et al., 2021). For example, in *A.T. v. Dry Creek Joint Elementary School District* (2019), a student who received special education services, A.T., was repeatedly restrained and isolated at school without his parent's knowledge. This case was taken to the ninth circuit court, alleging the school's denial of A.T.'s civil rights by unreasonable force and seizure and that the state placed A.T. in danger with deliberate indifference. The first allegation was dismissed; however, the second claim was found to hold due to the frequency of restraint and isolation, the danger it posed to the student, and the school's failure to inform the parents of the instances. We believe that the high frequency of restraint and seclusion and the decrease in behaviors by A.T. indicated that the school was using these practices as a behavioral management technique. Using restraint as a long-term behavioral management technique is ineffective and can lead to harmful outcomes, such as anxiety, aggression, and depression (Freeman et al., 2021; Freeman & Sugai, 2013; Nunno et al., 2006; Ryan et al., 2007).

In addition, *Kimes v. Matayoshi* (9th Cir., 2019) demonstrates inconsistent procedures across jurisdictions. Here, Kimes' argued that the school denied her daughter "reasonable accommodation." Kimes' daughter, R.K., was new to the school and had a recently developed behavior support plan. The plan included using restraint if R.K. was in immediate harm to herself or others. Kimes declared the plan authorized restraints without input from R.K.'s previous school. In her previous school, restraints were not permitted. The claim that the school acted with deliberate indifference

was not substantiated, as the previous school was involved in creating the new behavior plan, as was Kimes. This case demonstrates discrepancies in restraint policies across schools. The reason for having a policy permitting the use of restraint in the current school was that there were 430 students, whereas, in R.K.'s last school, there were only 10. The differences in policies across schools, districts, and states confuse families and do not allow consistency in supporting youth with challenging behaviors.

Current Law and Gaps

Federal Law

Currently, no federal law addresses the use of restraint and seclusion in schools. Students with disabilities may be protected under Section 504 of the Rehabilitation Act (1973) and Title II of the Americans with Disabilities Act (ADA; 2011) when restraint and seclusion are used with students with disabilities in a discriminatory manner (e.g., students with disabilities are subject to restraint and seclusion although students without disabilities are not subject to these procedures). In addition, the use of restraint and seclusion with students with disabilities who are eligible for services under the Individuals with Disabilities Education Improvement Act (2004) may violate this federal law if restraint and seclusion procedures are used in such a manner that compromises students' access to a free appropriate public education (FAPE). General education students, however, currently have no such protections under federal law. If a student's Individualized Education Program (IEP) includes prevention and intervention procedures designed to address problem behaviors, this should lead to fewer instances of restraint or seclusion. In addition, if restraint or seclusion interferes with the behavioral interventions in a student's IEP that could be considered a denial of FAPE.

The Keeping All Students Safe Act (117th Congress, 2020) has been proposed for years but has yet to pass in Congress (GovTrack.us, 2022). This act guides universal and effective reporting procedures and includes the "unlawful seclusion or restraint ban." This includes (a) seclusion; (b) mechanical restraint; (c) chemical restraint; (d) physical restraint or physical escort that is life-threatening that restricts breathing or that restricts blood flow to the brain, including prone and supine restraint; or (e) physical restraint that is harmful due to the student's disability, health-care needs, or medical or psychiatric condition, as documented (117th Congress, 2021). Passing this bill would significantly increase the safety of students in schools.

State Law

As there is no federal law regarding restraint and seclusion, state statutes and regulations differ immensely. In 2013, 30

states had legislative or regulatory documents, and 15 had policy or guidance documents (Freeman & Sugai, 2013). Presently, states with legislative or regulatory documents have remained the same (30), and states with policies or guidance documents have increased to 39 (Butler, 2019; Raza & Education Commission of the States, 2018). While there has been an increase in policies and guidance documents, many states still need to recognize and regulate harmful practices for students. To access a full review of state laws, visit <http://www.autcom.org/pdf/HowSafeSchoolhouse.pdf>.

District and School-Wide Policies

If a state has no policies or guidelines, each district creates its policies or possibly does not have any. Enacting a federal law aims to ensure universal access to the same protections between states, districts, and schools. Currently, there is none, so districts are in a position to create very different policies regarding restraint and seclusion.

Policy Alternatives and Concrete Action Steps

Federal Law Proposal

After evaluating the *Keeping All Students Safe Act*, which Congress did not pass, Peterson (2021) recommended continuing to advocate that this bill be proposed every year until it passes. It has been proposed in Congress for years but has failed each time (LeBel et al., 2012; Peterson, 2021). This law requires better practices to prevent the need for restraint and seclusion. Best practices for preventing restraint and seclusion include de-escalation strategies, Positive Behavioral Interventions and Supports (PBIS), Trauma-Informed Care, a streamlined reporting method, appropriate restrictions, and many more benefits to *all* students.

Teachers, administrators, and parents can advocate for the *Keeping All Students Safe Act* by contacting or writing their Congressmen and Senators. One way to interact with legislators is via social media (Fisher & Miller, 2021). Twitter handles and links to Facebook pages are located on legislators' websites. When critical issues come up, local legislators can be tagged using such social media. Another avenue for advocacy is to contact legislators directly through email or other contact information (e.g., phone, mail), which can be found on public websites. It is recommended to keep messages brief but personal. Because many legislators have minimal experience with education, personal stories will grab their attention and provide contextual insights. Keeping messages brief will allow them to engage in your story, given their limited time. Another way to advocate is to attend the Special Education Legislative Summit (SELS; Council for Exceptional Children, 2022). This conference is a meaningful opportunity for educators to interact with members of Congress to advocate for change.

State Law Proposal

To best protect students and teachers from harmful restraint and seclusion practices, five recommendations for state policies can be found in Table 1 (Butler, 2019).

The first two recommendations are preventive measures state policies can include to prevent the use of restraint and seclusion. Positive behavioral supports and interventions, trauma-informed care, and de-escalation training are recommended for (a) teachers to be well-trained and (b) schools to implement (Freeman et al., 2021; Ryan et al., 2007; Simonsen et al., 2019). Districts will have more continuity if these practices are mandated at the state level. Teachers and administrators can advocate for these practices to be brought to their state by contacting their state PBIS representative found at <https://www.pbis.org/about/pbis-state-coordinators> or reaching out to the teachers' union within the state. Teachers' union representatives are involved in state policies and can be good advocates for policy change. While PBIS coordinators do not specifically engage in state policy change, bringing best practices to one's state will help with the misuse of restraint and seclusion practices.

The final three recommendations are related to state policies for restraint and seclusion (i.e., banning restrictive, dangerous restraints such as prone and supine, ending restraint and seclusion immediately after the emergency, and enhancing reporting protocols). Again, reaching out to a teachers' union representative is a good way for teachers and administrators to advocate for improvements in state policies. In addition, teachers and administrators should become familiar with their state's current restraint and seclusion policies (Peterson, 2010). Knowing other state laws is also essential to compare and advocate for missing protections in one's state. If states have no laws or weak laws regulating the use of restraint and seclusion, advocates can disseminate information to state legislators by setting up meetings to discuss current issues (Fisher & Miller, 2021). Also, invite state legislators into the classroom or school. Potential ideas for meaningful visits include (a) showing legislators seclusion rooms, (b) inviting parents and students to talk with legislators, and (c) discussing specific instances where students or staff have been injured due to restraints. The goal of having legislators visit schools is to evoke an emotional response and engage in meaningful individualized discussions so that they understand the importance of the state-wide regulation of restraint and seclusion. Policy changes at the state level can broaden support and protections for students in all districts within the state.

District and School Policy Proposal

At the district and school level, the U.S. Department of Education (2012) issued 15 principles to be incorporated into the district and school policies. The principles summarized in Table 2 are guidelines administrators can use to

Table 1. Recommendations for State Policies.

Recommendation	States that have policies regarding recommendation
Require the state-wide use of positive behavioral supports and interventions (PBIS) and/or other evidence-based practices in behavior management for teachers to have least restrictive prevention and intervention practices in place.	Twenty-four (24) states require less-restrictive preventative methods and de-escalation before restraint or seclusion: Alabama, Alaska, Arizona, California, Connecticut, Colorado, Georgia, Hawaii, Indiana, Iowa, Kansas, Kentucky, Maine, Maryland, Massachusetts, Michigan, Mississippi, New Hampshire, New Mexico, Ohio, Oregon, Rhode Island, Vermont, and Wisconsin.
Require all staff certification standards to include extensive education and training in PBIS, relationship-building, de-escalation techniques, and other evidence-based practices. This may include, but is not limited to, school resource officers, teachers, paraprofessionals, administrators, and counselors.	Twenty-five (25) states require training in de-escalation and prevention of seclusion/restraint: Alaska, Alabama, Colorado, Connecticut, Delaware, Georgia, Hawaii, Illinois, Indiana, Kansas, Kentucky, Maryland, Massachusetts, Maine, Michigan, Mississippi, North Carolina, Ohio, Oregon, Rhode Island, Utah, Vermont, Wisconsin, West Virginia, and Wyoming.
Eliminate the use of seclusion, prone restraints, and all other types of restraint except when the immediate physical safety of the student or others is clearly threatened.	Two (2) states ban seclusion: Georgia and Hawaii Sixteen (16) states ban prone and all restraints that obstruct breathing or threaten life for all children: Alaska, Colorado, Connecticut, Iowa, Kansas, Kentucky, Maryland, Michigan, Minnesota, New Hampshire, Oregon, Ohio, Rhode Island, Utah, West Virginia, and Wyoming.
Require instances of restraint and seclusion to end immediately when the emergency ends.	Twenty-four (24) states require restraint and seclusion to immediately end when there is no longer an emergency: Alaska, Alabama, Arizona, California, Colorado, Connecticut, Georgia, Hawaii, Indiana, Kentucky, Maine, Massachusetts, Mississippi, Michigan, New Hampshire, New Mexico, Ohio, Oregon, Rhode Island, Vermont, Utah, Washington, Wisconsin, and West Virginia.
Enhance the state's reporting protocols for restraint and seclusion and effectively use reporting data for program improvement at the local and state level.	Twenty-three (23) states mandate detailed written follow-up about restraint and seclusion incidents for all children: Alaska, Arizona, California, Colorado, Connecticut, Delaware, Hawaii, Illinois, Indiana, Iowa, Kansas, Maine, Massachusetts, Michigan, Mississippi, New Hampshire, New Mexico, Ohio, Oregon, Utah, Vermont, Washington, and West Virginia.

Note. PBIS = positive behavioral supports and interventions.

Table 2. Key Evaluation Points to Ensure Appropriate and Equitable Restraint and Seclusion Practices.

Principle	Summary
Principle 1	R&S prevention efforts <i>must</i> be fully implemented.
Principle 2	Mechanical and chemical restraints should never be used.
Principle 3	R&S should only be used in instances where the student is in immediate harm to himself or others. The R&S must be stopped immediately after harm has ceased.
Principle 4	R&S policies should apply to all students.
Principle 5	Students' right to be treated with dignity and to be free from abuse must be maintained.
Principle 6	R&S should never be used as punishment, discipline, coercion, or retaliation.
Principle 7	R&S should never restrict a child's breathing or harm a child.
Principle 8	Reviews of R&S incidents should occur, especially when high frequencies are reported. The reviews should evaluate and/or create behavior plans for the identified students.
Principle 9	Behavioral strategies should be function-based and target-specific behaviors.
Principle 10	All staff should be regularly trained in behavioral interventions and supports and R&S practices.
Principle 11	Each instance of R&S should be monitored to ensure appropriateness of its use.
Principle 12	Parents should be informed on relevant laws and policies around R&S.
Principle 13	Parents should be notified after each instance of R&S with their student.
Principle 14	Regular reviews and updates of R&S policies should occur.
Principle 15	Policies must include documentation guidelines of R&S instances.

Note. R&S = restraint and seclusion.

Case Example	
<p>This week, Ms. Pedersen, a fifth-grade special education teacher, engaged in four improper restraints with the same student. Each instance, the student was refusing to leave an empty classroom and was tearing the posters off the walls. The first time the student engaged in this behavior, Ms. Pedersen attempted to deescalate for 15 minutes, then engaged in a standing restraint until the child stopped fighting and complied. The next three times this occurred, Ms. Pederson attempted to deescalate for five minutes and then engaged in the same restraint until the student complied. Another teacher, Ms. Rose who took notes during each instance of restraint, noticed how Ms. Pedersen was (a) using restraint practices as a behavior management technique and (b) using restraint practices when the student was not in immediate harm to himself or others.</p>	
Positive Response	Negative Response
<p>Ms. Rose recognized the problem and decided to be proactive. She had a conversation with Ms. Pedersen about this use of restraint and how it was against school, district, and state policies. The conversation was free of judgement or resentment, rather presented in a professional manner with evidence from the policies. Ms. Rose explained to Ms. Pedersen that due to the policies, she had to schedule a collective meeting with Ms. Pedersen and the principal to discuss the improper use of restraints but would like to discuss solutions with Ms. Pedersen before the meeting so they can go in as a team with solutions already prepared. Ms. Pedersen was grateful for the conversation and benefitted from re-examining the school policies on restraint. Ms. Pedersen and Ms. Rose also had a productive meeting with the principal, who was glad solutions to the problem were already being put in place.</p>	<p>Ms. Rose recognized the problem immediately and went straight to the administrator with the problem. The administrator had to call a meeting together with Ms. Rose and Ms. Pedersen and discuss the problem. Ms. Pedersen was referred to restraint training before she could perform another, and Ms. Rose was also referred to training, as she didn't report the problem immediately. Ms. Pedersen was furious that Ms. Rose did not come to her first. The principal was irritated that not only she had to spend time and money to have both teachers re-trained, but now she had to mediate the negative relationship between the two teachers. She was sure more problems would arise in the future between the two.</p>

Figure 1. Case Example of Effective Communication of a Problem.

ensure equitable and safe policies and practices exist in their schools in case of an emergency where restraint and seclusion are warranted (U.S. Department of Education, 2012).

Because no federal law regulates restraint and seclusion practices, it is ultimately up to administrators, teachers, and district staff to implement safe and appropriate practices. The district- and school-level staff are essential in ensuring equitable policies and practices. Advocating for the safety of students with school and district personnel is essential. Cornelius and Gustafson (2021) provide a model that combines self-advocacy and implementation science to understand how to best advocate for students' and staff's safety as a teacher. The model includes creating Professional Learning Communities (PLCs), using data and shared knowledge to make decisions, and creating valuable relationships with administrators and district leaders. Professional Learning Communities are recommended as a tool to connect with like-minded staff regarding behavioral practices and restraint and seclusion policies (Cornelius and Gustafson, 2021; Fisher & Miller, 2021). A PLC can act as a support group where teachers can come together, share knowledge on the topic, make data-based decisions, and brainstorm ways to improve policies within the school (Sai & Siraj, 2015; Sompong & Erawan, 2015). From a PLC, teachers can disseminate and present information to administrators and district leaders as a policy change advocacy method.

The final and arguably most important factor in teacher advocacy is their relationships with administrators

and district leaders. Teachers must be solution-focused and professional to strengthen these relationships (Cornelius & Gustafson, 2021). An example of proper and improper restraint and conversation can be found in Figure 1. Notice how the positive conversation used expertise to build relationships by being proactive by developing solutions collaboratively. Engaging in solution-based conversations will build relationships and lead to positive outcomes for the staff and students involved.

Conclusion

There have been positive policy improvements since the impactful report "School is not supposed to hurt" (National Disability Rights Network, 2009), especially at the state level (e.g., Massachusetts, Ohio, and Oregon). The key to moving forward is to continue supporting and petitioning for the *Keeping All Students Safe Act* to be passed and advocating for local schools to evaluate restraint and seclusion practices systematically and effectively according to the suggestions provided in this document. All students deserve to be protected against harmful practices. Scholars and student advocates in the field have offered guidance to schools focusing on alternatives to seclusion and restraint, yet there is still a gap in the use of recommended practice (Freeman et al., 2021; Gage et al., 2020; Verret et al., 2019). Previous research outlines alternatives to restraint and seclusion; however, from a systems-level perspective, federal, state, district, and school policy ultimately regulates the behaviors of the school staff.

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