



Public Schools of North Carolina
State Board of Education
Department of Public Instruction



NC Department of Health and Human Services
Division of Mental Health/Development Disabilities/Substance Abuse
Services

Report to the North Carolina General Assembly

Education of Children in Private Psychiatric
Residential Treatment Facilities (PRTFs)

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**Submitted by the North Carolina Department of Public Instruction
Exceptional Children Division, in conjunction with North Carolina
Department of Health and Human Services Division of Mental
Health/Developmental Disabilities/Substance Abuse Services**

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Education of Children in Private Psychiatric Residential Treatment Facilities (PRTFs)

This is a joint report as required by NC General Statute 122C-454 to the Joint Legislative Education Oversight Committee and to the Joint Legislative Oversight Committee on Health and Human Services. The Department of Health and Human Services (DHHS) and the Department of Public Instruction (DPI) have assumed the responsibility of the qualification and disbursement of funds for educational services in private Psychiatric Residential Treatment Facilities (PRTFs).

Leadership Team

Staff from the Department of Public Instruction (DPI) Exceptional Children Division (EC), Division of Mental Health, Developmental Disabilities and Substance Abuse Services (DMH/DD/SAS), and the Division of Health Service Regulation (DHSR) have continued to work together this State fiscal year (SFY) to ensure that children in Psychiatric Residential Treatment Facilities (PRTFs) are receiving an appropriate education and to ensure that the requirements of the legislation are met. The leadership team is composed of the following agency representatives:

Department of Public Instruction, Exceptional Children Division

- Sherry H. Thomas, Director
- Carol Ann Hudgens, Section Chief, Policy, Monitoring, and Audit
- Glendora Hagins, Monitoring Consultant; provides on-going assessment, monitoring, consultation and technical assistance and to the special education programs.

Department of Health and Human Services, Division of Mental Health, Developmental Disabilities and Substance Abuse Services

- Eric Harbour, Child Lead, Community Mental Health Section
- Mary Ellen Anderson, Project Manager; provides on-going execution and monitoring of PRTF education contracts for funding.

Department of Health and Human Services, Division of Health Service Regulation

- Michiele Elliott, Interim Chief, Mental Health Licensure and Certification Section
- Azzie Conley, Chief, Acute and Home Care Licensure and Certification Section

Eligibility, Allocations and Contracts

In SFY 2020, fifteen (15) contracts were initially executed to provide funding for educational services. The fifteen (15) parent organizations in North Carolina manage twenty-nine (29) facilities. These facilities met the following requirements for funding:

- Licensed through the DHHS, DHSR, to provide PRTF services that fall under the requirements of the legislation.
- Registered as a non-public school with the NC Department of Administration, Division of Non-Public Education.
- Approved Exceptional Children Program by the North Carolina Department of Public Instruction, Division of Exceptional Children.

Allocations and budgets were approved by the EC Division and DMH/DD/SAS leadership teams as agreed upon in the Memorandum of Agreement (MOA) between DPI and DHHS. Funding was allocated to providers to ensure teacher ratios were met, including the requirement of a licensed EC teacher if a student with an Individualized Education Program (IEP) was enrolled, and to ensure that quality educational services were being provided to students.

A list of the parent organizations is attached at the end of this report.

Technical Assistance, Monitoring and Support

EC Summer Institutes

For the 2019-20 school year, information was provided to the educational staff at the PRTF for the opportunity to participate in the professional development sessions offered by the EC Division at the University of North Carolina at Greensboro. A Summer Literacy Institute was held during the week of July 15-19, 2019, and the annual Summer Institute was held during the week of July 22 – July 26, 2019.

PRTF Collaborative Meetings

DPI EC Division and DHHS sponsored one (1) PRTF Collaborative meeting on October 25, 2019, in Raleigh. In these meetings, the administrative and educational staff received agency updates, professional development, and opportunities to network. The second collaborative meeting scheduled for April 2020 was cancelled as a result of travel restrictions due to COVID-19.

Agenda items for the October meeting included updates from DHHS and DPI, Every Child Accountability Tracking System (ECATS) new forms for the Individualized Education Program (IEP) process, and a presentation and updates by the Project Director for the Six Core Strategies of the Building Bridges Initiative since many of the PRTFs are participating in the pilot project.

Professional Development Opportunities

Administrative and educational staff in the PRTFs are provided information about the annual Conference on Exceptional Children sponsored by the DPI EC Division in Greensboro. During the 2019-20 school year, conference and registration information were shared with the educational and meeting contacts for each PRTF. The 69th Conference on Exceptional Children was held November 20 – 22, 2019. Educational staff from several PRTFs were afforded the opportunity to participate in the annual conference.

Website

DPI EC Division's website serves as a resource for all special education programs. While the division maintains information specifically for PRTFs on its website, access to a wide-range of subjects is also available to support the PRTFs' educational programs for students with disabilities in the areas of:

- Conferences, Professional Development (PD) and Webinars to promote professional development;
- Disability Resources for information about a variety of eligibility categories and services;
- Instructional Resources to access a variety of disability specific instructional services;
- Parent Resources to provide support to families;
- Policies to ensure federal and state compliance for improved services for students with disabilities;
- Recruitment and Retention to support recruiting, hiring, and retaining teachers with EC licensure;
- Directory of regionally and statewide assigned EC Division Consultants; and
- A calendar of professional development events and activities sponsored by the EC Division.

Specific information for the PRTFs can be found at - <http://ec.ncpublicschools.gov/policies/non-public-schools> and links to general information can be located on the EC Division's homepage at - <http://ec.ncpublicschools.gov/>

PRTF Handbook

The PRTF Handbook was collaboratively developed by DPI, EC Division, and DHHS, and continues to serve as a resource to facility staff. The handbook provides guidance to the PRTF administration and educational staff focusing on the legislative, special education, and contract requirements. An electronic version of the handbook is available on the EC Division's website at – <http://ec.ncpublicschools.gov/policies/non-public-schools/prtf-handbook.pdf>. Printed copies of the guidance document have been made available during on-site activities (technical assistance/support and monitoring visits), collaborative meetings, and the PRTF Summer Academy. This handbook also serves as a resource to staff in local education agencies.

EC Program Approval Visits

The EC Program Approval (ECPA) is the monitoring activity used to ensure that students with disabilities are provided a free and appropriate public education and to improve their academic and functional skills while they are receiving treatment in a PRTF setting. This activity occurs upon initial licensure as a PRTF and every three years to renew status as a facility approved to provide special education services.

During the 2019-2020 school year, ECPA monitoring activities were scheduled to be conducted at nine (9) facilities. On-site monitoring visits were conducted at four (4) facilities. These visits were conducted by DPI EC Division Consultants in collaboration with the DHHS project contract staff. The five (5) remaining monitoring visits that were scheduled in April and May have been postponed as of result travel restrictions due to COVID-19. For these facilities, the ECPA process will be commensurate, virtual, onsite or blended, to how the local education agencies (LEAs) will be monitored during the 2020-2021 school year.

Technical Assistance and Support

DPI, EC Division Consultants, and the DHHS Project Manager provide customized and individualized support to educational staff in PRTFs through a variety of exchanges (phone calls, face to face contacts, and emails) in the areas of record requests, process and policy questions, transitions and discharges, budgets and contracts, etc.

Monitoring

The DHHS Project Manager performs all monitoring activities required by DHHS for contract management and administration.

The DPI EC Division Consultant conduct on-site visits as a part of monitoring as outlined in the EC Program Approval process.

PRTF Self-Assessment

Each PRTF is required to submit the ECPA Self-Assessment annually to the DPI EC Division Consultant. This provides updates about the facility's academic and special education programs and documents services for the current school year. The self-assessments are reviewed by the DPI Consultant and DHHS Project Manager and are used to inform the EC Program Approval process.

Information Sharing

PRTFs have been informed of the notification requirements to the DPI EC Division. A procedure is in place to report admissions and discharges and to request records from previous schools. A form letter has been developed and revised, as appropriate, to request records upon admission to PRTFs. A contact list, of designated staff in the local education agencies (LEAs) who will assist with record requests and discharge planning when students are admitted to PRTFs, has been developed and is updated annually. PRTF staff can also contact the EC

Division Consultants and the DHHS Project Manager if assistance is needed with obtaining records or discharge planning.

Agency Collaboration

The EC Division Monitoring Consultant and the DHHS Project Manager collaborated with the Division of Non-Public Education (DPNE) Director and Education Consultant throughout the school year. As a non-public school, PRTFs are able to submit the Non-Public School Annual Report online. On-site visits are also conducted by the DPNE Consultant.

Reporting Requirements

A database was developed and implemented for the PRTFs with education service contracts. Data is reported to DMH/DD/SAS on a quarterly basis. COVID-19 impacted several of the data elements this past school year.

The COVID-19 pandemic impacted the number of admissions, discharges and length of stay. Transitions between placements became difficult as quarantine and stay in place executive orders were implemented to limit exposure. Therefore, some admissions and discharges were delayed, and the average length of stay may be longer than in years past as a result of the child's placement when the Governor's Orders were put in place and the subsequent closure of school buildings.

The contract PRTF agencies submitted the following data based on services provided from July 1, 2019 – June 30, 2020.

- **Number of Children served** – 970
- **Average Daily Census** - 338
- **Average Age** – 14
- **Females** – 417
- **Males** – 547
- **Transgender** – 5
- **Does not identify with a gender** - 1
- **Average length of stay** – 200 days
- **Number of Children with IEPs** (identified as Exceptional Children) – 431
- **Categories of Disability** - number of children in each category for children identified as Exceptional Children:
 - Autism – 12
 - Emotional Disability – 197
 - Multiple Disabilities – 1
 - Developmental Delay – 9
 - Intellectual Disability – 40
 - Other Health Impaired – 138
 - Learning Disabilities – 33
 - Speech/language impairment - 1

These numbers do not include the statistics for a PRTF that specializes in children with eating disorders. The population served is very different than that of the other PRTFs. Statistics for this program are as follows:

- **Number Served** – 250
- **Average age** –15
- **Female** – 226
- **Male** – 17
- **Transgender** – 7
- **Average length of stay** – 33 days

- **Number of Children with IEPs – 7**
- **Categories of Disability –**
 - Learning Disability – 1
 - Other Health impaired – 5
 - Emotional Disability - 1

Types of Educational Services Provided

The types and hours of academic services provided were determined for all children admitted in the PRTFs. The children received an average of one hundred (100) days of general education services. Children with IEPs received an average of one hundred seventy- two (172) hours of special education and related services. The DPI EC Division Monitoring Consultant reviewed and verified special education services at each facility during the EC Program Approval process.

Costs of Services

Ensuring that teacher ratios and EC requirements are met continues to be the priority for funding allocations. Funding allocations are based on the average daily census reported by each parent organization. In SFY20, DHHS requested reimbursement of \$3,058,240.00 from DPI for education services.

Outcomes

Client admission and discharge from a PRTF is based on medical necessity and mental health/substance use treatment recommendations for each individual child by the child’s treatment team and the Utilization Management Department for the responsible LME/MCO. Children are admitted and discharged to PRTFs throughout the school year and are served by other school systems prior to and following placement in the PRTF. Measuring individual child education outcomes for the period a child is placed in a PRTF is a challenge and has been particularly affected by COVID-19 during the 2019-2020 school year. Educational opportunities were impacted for all children in North Carolina, including those served in PRTFs. School buildings were closed in the Spring of 2020 for the remainder of the school year and public schools were encouraged to provide remote learning opportunities. Remote learning opportunities varied across the state and were dependent upon the student, the student’s individual needs, accessibility and unique family circumstances. The transfer of educational records required additional time as public- school staff began teleworking and providing remote learning. A primary method of measuring student outcomes is based on performance on state mandated assessments, however, the requirement for administering statewide assessments were waived in light of the pandemic and subsequent school closures. Reasonable accommodations for formalized grading and assessment of public- school students were implemented in order to hold students harmless for the unexpected closure of public schools. Therefore, the varied assessment methods – both formal and informal – contributed to the gaps in data specific to educational outcomes for children residing in PRTFs consistent with all children in North Carolina public schools.

The Non-Public Exceptional Children Program Approval process was developed and implemented through the DPI EC Division in 2014, after the *Education of Children in Private Psychiatric Residential Facilities* legislation was enacted. Each licensed site has been assessed through an on-site monitoring visit by DPI EC Division consultants. Programs were initially granted provisional approval to allow time for the EC consultant to provide technical assistance and monitoring and for programs to receive necessary funding to meet requirements. Currently all contracted agencies have full approval of their EC program.

Recommendations

1. **Increased collaboration between education and treatment staff in the PRTFs. Education programs are more successful in carrying out requirements when treatment and education staff collaborate and plan together from the time of admission through discharge. Education staff must be kept informed of possible client admissions or discharges to improve transition planning.**
 - **SFY20 Result:** DMH/DD/SAS has begun a statewide initiative to improve interventions in PRTFs. The DPI regional monitoring consultant and the DHHS contract administrator will collaborate with the Project Coordinator for the PRTF Residential Improvement Project to ensure that strategies incorporate both the clinical treatment and the education needs of youth in PRTFs. Transitions into the PRTF and back into the community following discharge are priorities of this initiative.

As a result of COVID-19, programs are focused on maintaining client and employee safety and well-being.

Attachment Parent Organizations with Contracts for Educational Services In Psychiatric Residential Treatment Facilities

Alexander Youth Network

Barium Springs Home for Children

Brynn Marr Hospital, Inc.

Canyon Hills Treatment Facility

Cornerstone Treatment Facility, Inc.

Cornerstone Treatment Facility Program, Inc.

Eliada Homes, Inc.

Premier HealthCare Services, Inc.

Premier Service of the Carolina, LLC

Nova, Inc.

Strategic Behavioral Health Center - SBH Raleigh, LLC

Strategic Behavioral Health Center - SBH Wilmington, LLC

Thompson Child and Family Focus

Veritas Collaborative, LLC

Youth Focus, Inc.