# Practical Guidance for Exploring the Integration and Alignment of the Student Assistance Program (SAP) with a Multi-Tiered Framework of Support

*August 2021*

**Commonwealth of Pennsylvania**
Tom Wolf, Governor

**Department of Drug and Alcohol Programs**
Jennifer Smith, Secretary

**Department of Education**
Noe Ortega, Secretary

**Department of Human Services**
Meg Snead, Acting Secretary

The Department of Drug and Alcohol Programs (DDAP) mission is to engage, coordinate and lead the Commonwealth of Pennsylvania's effort to prevent and reduce drug, alcohol and gambling addiction and abuse; and to promote recovery, thereby reducing the human and economic impact of the disease.

The mission of the Department of Education (PDE) is to ensure that every learner has access to a world-class education system that academically prepares children and adults to succeed as productive citizens. Further, the Department seeks to establish a culture that is committed to improving opportunities throughout the commonwealth by ensuring that technical support, resources, and optimal learning environments are available for all students, whether children or adults.

The mission of the Department of Human Services (DHS) is to assist Pennsylvanians in leading safe, healthy, and productive lives through equitable, trauma-informed and outcome-focused services while being an accountable steward of commonwealth resources.

Please contact your [SAP Regional Coordinator](#) and/or your local PBIS facilitator with questions about the contents of this guidance document or for support with your integration and alignment efforts.

# Table of Contents

# Acknowledgements

The Pennsylvania Department of Education (PDE) and the Pennsylvania Department of Human Services (DHS) would like to acknowledge and thank members of the three school districts that shared their experiences and feedback with the workgroup that developed this guidance document.

Elizabeth Forward School District: https://www.efsd.net/

Somerset Area School District: https://www.sasd.us/

West Chester Area School District: https://www.wcasd.net/

The following individuals participated in the state-level workgroup that developed this document:

Marie Bozelli | Region IX-SAP Coordinator | PNSAS

Roberta Chuzie | Assistant Statewide MH SAP Coordinator | PNSAS

Tim Knoster, Ed.D. | McDowell Institute: College of Education at Bloomsburg University

Nikole Hollins-Sims, Ed.D | Special Assistant to the Secretary | PDE

Dana Milakovic, PsyD, NCSP | Mental Wellness and Trauma Specialist, Office for Safe

Schools | PDE

Generette McKinley | Drug and Alcohol Program Analyst | DDAP

Regina Myers | Regional SAP Coordinator, Training and Consultation | Intermediate Unit 19

Kelly Perales, LCSW | Co-Director | Midwest PBIS Network

Kathryn Poggi, Ed.D, BCBA | Educational Consultant | PaTTAN

Perri Rosen, Ph.D, NCSP | Consulting Psychologist | Office of Mental Health and Substance Abuse Services | DHS

Susan Tarasevich, Ed.D. | Lead Trainer, SAP, Prevention-Ed of Addiction Medicine Services | UPMC-Western Psychiatric Hospital

Lisa Thomas, Ph.D., NCSP | Assistant Director | Devereux Center for Effective Schools

Renee Urick, MSW, LSW | Region VII Coordinator | PNSAS

## ACRONYM LIST

CoP SBBH: Community of Practice: School Based Behavioral Health
DDAP:          Pennsylvania Department of Drug and Alcohol Programs
DHS:           Pennsylvania Department of Human Services
ESAP:          Elementary Student Assistance Program
FERPA:        Family Educational Rights and Privacy Act
LEA:           Local Educational Agency
MTSS:         Multi-Tiered System of Support
PaTTAN:       Pennsylvania Training and Technical Assistance Network
PAYS:         Pennsylvania Youth Survey
PDE:           Pennsylvania Department of Education
PaPBS:         Pennsylvania Positive Behavior Support Network
PASTP:         Pennsylvania Approved SAP Training Provider
PBIS:          Positive Behavior Interventions and Supports
PNSAS:        Pennsylvania Network for Student Assistance Services
PPRA:          Protection of Pupil Rights Amendment
RtII:           Response to Instruction and Intervention
SAP:           Student Assistance Program
SRSS:          Student Risk Screening Scale

## Background

Pennsylvania schools are presently navigating multiple initiatives focused on student social, emotional, and behavioral wellness.  All schools throughout the Commonwealth are required to have a Student Assistance Program (SAP), with SAP overseen by the Pennsylvania Network for Student Assistance Services (PNSAS) led by the Departments of Drug and Alcohol Programs (DDAP), Education (PDE), and Human Services (DHS).  Additionally, the Pennsylvania Positive Behavior Support (PaPBS) Network has been supporting schools throughout the Commonwealth with the installation and scale-up of the Positive Behavior Interventions and Supports (PBIS) framework for over a decade, with the number of schools implementing PBIS with fidelity increasing steadily over time.  Given these and other related initiatives that may be situated within a multi-tiered decision-making framework, it is logical and efficient for schools to consider how their efforts to meet the social, emotional, and behavioral needs of all students can be aligned.

PNSAS and the PaPBS Network co-developed two prior guidance documents in 2011 and 2017, which both focused on the integration of SAP and PBIS.  Over the past several years, trainers, facilitators, and others directly involved in supporting Pennsylvania schools with SAP and/or frameworks reflecting multi-tiered logic (e.g., MTSS including PBIS) have continued to field questions from schools looking to better understand how to align these efforts.  The purpose of this document is to provide considerations and practical strategies for school leadership teams seeking to create an integrated structure for these approaches.  This document reflects the four phases of systems change drawn from implementation science to highlight action steps for school teams that have not yet considered an integrated structure, or that are interested but unsure of how to begin this alignment.  Focusing primarily on the first two stages of exploration and installation, this document provides recommendations and offers practical examples from Pennsylvania schools that have experienced success navigating the integration and alignment process.  Additionally, the document highlights actions and considerations for schools that have not yet begun or are in early stages of the integration and alignment process.

The document is organized into the following key sections:
1. Definitions
2. Process for the Development of this Document
3. Integration and Alignment Steps Analysis
4. Key Themes and Suggested Strategies for Exploration and Installation
5. Recommendations for Effective SAP Alignment with Multi-Tiered Frameworks
   ✓ Readiness and Planning
   ✓ Teaming
   ✓ Common Referral Process
   ✓ Family Engagement, Consent, and Confidentiality
   ✓ Data-based Decision-making and Documentation
6. Closing and Acknowledgements

## Definitions

For the purposes of your review of this document, the following terms are important to clarify:

## Multi-Tiered System of Supports (MTSS)

A standards-aligned, comprehensive school improvement framework for enhancing academic, behavioral, and social-emotional outcomes for all students. As part of the MTSS framework, cross-disciplinary teams represented at the local education agency (LEA), school, grade and individual levels use a problem-solving process to integrate evidence-based academic, behavioral, and social-emotional programs and practices matched to student needs. A continuum of supports for staff and student services exist across three tiers and is undergirded by high-quality professional learning, cultural responsivity, partnership and meaningful involvement with families, and dynamic decision-making that rests on the use of reliable and valid data sources:

a) Tier 1 (Universal): Provide preventive, proactive, and universal practices and support to enhance academic, social-emotional, and behavioral outcomes with all students (e.g., school climate, comprehensive mental health, social-emotional learning).
b) Tier 2 (Secondary): Provide targeted interventions to support students who require more intervention and support than is typically provided at Tier 1 (Universal). Interventions and supports should be aimed at the causal roots of factors adversely impacting learning.
c) Tier 3 (Tertiary): Requires the most intensive level of individualized intervention for students with the most significant, high intensity support needs (assessment based). Interventions and supports should be aimed at the causal roots of factors adversely impacting learning.

## Positive Behavioral Interventions and Supports (PBIS)

A proactive, multi-tiered approach to discipline that promotes appropriate student behavior and increased learning. PBIS provides direction and a decision-making framework for developing a comprehensive system of behavior support tailored to individual program and school needs and reflects a three-tiered approach:

a) Tier 1 (Universal): Provides a system of supports to all students in a school, based on preventative practices which emphasize teaching and reinforcing expected student behaviors.
b) Tier 2 (Secondary): Provides targeted interventions and supports to support students who require more intervention than is typically provided at Tier 1 (Universal).
c) Tier 3 (Tertiary): Requires the most intensive individualized level of intervention for students with the most significant social-emotional and behavioral support needs.

## Student Assistance Program (SAP)

The Pennsylvania Student Assistance Program (SAP) is a systematic team process used to mobilize school resources to remove barriers to learning. There are four phases to the SAP process: referral, team planning, intervention and recommendations, and support and follow-up. SAP is designed to assist in identifying issues including alcohol, tobacco, other drugs, and mental health issues which pose a barrier to a student's success. The primary goal of the SAP is to help students overcome these barriers so that they may achieve, advance, and remain in school.

According to Pennsylvania Public School Code, schools in Pennsylvania are required to establish and maintain SAP for all students K-12. SAP team members must be trained by a Pennsylvania Approved SAP Training Provider (PASTP). While Student Assistance Programs exist in other areas of the country, the structure and operation of the program in

> Pennsylvania is a unique integrated model serving the needs of Pennsylvania families and students.
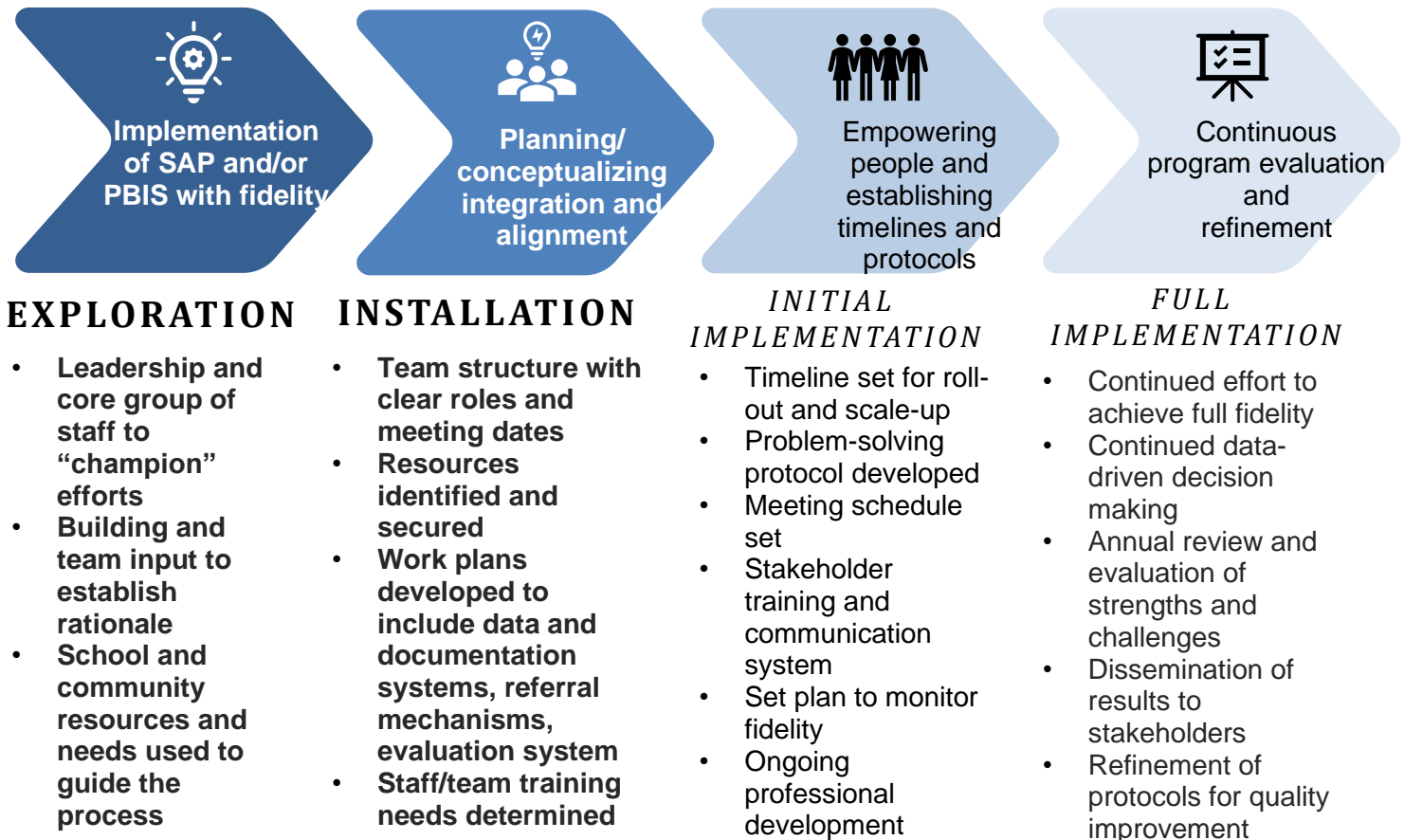
## Process for the Development of this Document

In 2019, PDE's Office for Safe Schools and DHS's Office of Mental Health and Substance Abuse Services engaged partners from PNSAS and the Community of Practice on School-based Behavioral Health (CoP SBBH) to establish a state-level workgroup involving members with expertise and experience in SAP and/or MTSS/PBIS. The workgroup utilized SAP liaisons and PaPBS facilitators to help identify schools or districts in the process of navigating integration and alignment of SAP and multi-tiered frameworks. Members of the workgroup then connected with staff from these LEAs, identifying three that were in the full implementation phase that also represented varying geographical locations and grade levels. Staff from the three LEAs met with the full workgroup in January 2020 to provide feedback on their specific process related to the core components relevant to SAP and the application of multi-tiered logic that were identified in advance by the workgroup. Using this information, workgroup members identified key themes related to alignment efforts across the three LEAs, while acknowledging that specific details of implementation varied based on local capacity, resources, and needs.

## Integration and Alignment Steps Analysis

The graphic below represents actionable milestones associated with the integration and alignment of SAP and MTSS/PBIS. The graphic notes key features associated with each phase of the change process, drawn from implementation science, that help to assess readiness (Fixen et al., 2018).

# INTEGRATION STEPS ANALYSIS

| **Implementation of SAP and/or PBIS with fidelity** | **Planning/ conceptualizing integration and alignment** | Empowering people and establishing timelines and protocols | Continuous program evaluation and refinement |
|---|---|---|---|

| **EXPLORATION** | **INSTALLATION** | *INITIAL IMPLEMENTATION* | *FULL IMPLEMENTATION* |
|---|---|---|---|
| • **Leadership and core group of staff to "champion" efforts**<br>• **Building and team input to establish rationale**<br>• **School and community resources and needs used to guide the process** | • **Team structure with clear roles and meeting dates**<br>• **Resources identified and secured**<br>• **Work plans developed to include data and documentation systems, referral mechanisms, evaluation system**<br>• **Staff/team training needs determined** | • Timeline set for roll-out and scale-up<br>• Problem-solving protocol developed<br>• Meeting schedule set<br>• Stakeholder training and communication system<br>• Set plan to monitor fidelity<br>• Ongoing professional development | • Continued effort to achieve full fidelity<br>• Continued data-driven decision making<br>• Annual review and evaluation of strengths and challenges<br>• Dissemination of results to stakeholders<br>• Refinement of protocols for quality improvement |

## Key Themes and Suggested Strategies for Exploration and Installation

The following themes were derived either directly or indirectly from three LEAs based on feedback about their process toward integration and alignment of SAP and multi-tiered frameworks.

### *LEA-Identified Themes for Lessons Learned*

Given that the three LEAs are in full implementation with their integrated and aligned SAP and MTSS/PBIS structures, they offered several lessons learned while navigating the *exploration* and *installation* phases of their school or district-specific process. In general, these lessons learned underscored the need for *staff support* and *motivation* for engaging in this process.

Theme #1: Cross-disciplinary Staff Support
- ✓ The three LEAs underscored the importance of *having the right people at the table* to advance this process. Specifically, they discussed having had a *core group of staff* to "champion" the integration and alignment efforts, noting that the *consistent involvement* of these staff was essential.
- ✓ Within this core group that championed the integration and alignment efforts, *enthusiasm* and *maintaining a positive outlook* throughout the process helped propel teams toward their shared vision.

Theme #2: Clear Rationale for Alignment
- ✓ The three LEAs all described the rationale for their decision to integrate and align their SAP and multi-tiered structures as *efficiency*, in line with the concept of *working smarter, not harder*. Specifically, integration and alignment offered value by supporting more effective use of staff, time, and resources.
- ✓ In reflecting on their process, the LEAs reported feeling successful in their efforts to create a more efficient structure but underscored that this process takes time, or – in the words of one school staff member – *"patience-plus."*

**Suggested Strategy:** Educate key stakeholders on the goal and establish a leadership team with buy-in, shared decision-making, and a clear action plan.

> **Relevant Resource:** Consider outreach to Regional Coordinators from PNSAS, and/or local facilitators from the PaPBS Network and PaTTAN for additional support and assistance with the initial phases of this process.

### *Workgroup-Identified Themes*

Upon the workgroup's review of the input across the three LEAs, additional process-related themes were identified that highlight how the *uniqueness* and *strengths* of each LEA contribute to variation in specifics of exploration and installation of an integrated structure for SAP and multi-tiered frameworks.

Theme #3: Similar overarching process tailored to individual LEA priorities and resources
- ✓ In reviewing the feedback provided from the three LEAs, the workgroup identified consistency in terms of an overarching process toward integration and alignment,

noting that the *details of each LEA's process and integrated structure varied*. While all three LEAs had clear motivation, each of their efforts evolved from a *unique starting point* and developed based on LEA priorities, needs, capacity, and resources.

Theme #4: Process is strengths-based
- ✓ Throughout the Commonwealth, patterns of implementation for each initiative suggest that there have been challenges associated with fidelity, specifically with SAP at the elementary level (ESAP) and with PBIS at the advanced tiers (Tiers 2/3). For LEAs that have chosen to integrate and align their efforts, the workgroup noted that the strengths of each initiative helped strengthen aspects of the other initiative and in part, served as a foundation for starting the integration and alignment process.
- ✓ Schools that have increasingly moved in the direction of alignment typically indicated either implementing SAP with a high level of integrity or the PBIS framework with fidelity (and having been recognized in some manner for high fidelity implementation at the universal level).

**Suggested Strategy:** Utilize a leadership team to identify and assess strengths, needs, and resources related to existing SAP and multi-tiered team functioning, fidelity, and outcomes. Members of this team should have knowledge of best practices for both SAP and multi-tiered frameworks and/or engage relevant partners (e.g., SAP liaisons, PBIS facilitators) to provide a balanced perspective.

---

**Relevant Resource:** Consider using an initiative inventory to help organize and advance this process: Interconnected Systems Framework Initiative Inventory.

---

## Recommendations for Effective SAP Alignment with Multi-Tiered Frameworks: Readiness and Planning

With regard to establishing readiness and taking steps to plan for the integration and alignment of SAP and multi-tiered frameworks, LEAs were asked the following:

- *What factors influenced your decision to integrate and align your SAP and MTSS/PBIS efforts, and how did you establish readiness?*
- *What steps were taken to plan for integration and alignment, and what areas were primary considerations in this process?*

*Key Themes and Illustrations*

**Support from leadership.** Both district and building level leadership recognize and own the importance of a fully integrated multi-tiered system of support, which aligns with district and building level culture and climate. Strong administrative buy-in is critical to ensure efficient action planning and allocation of resources to effectively integrate the SAP and multi-tiered frameworks. Leadership provides tangible help through expertise, time, and financial support, as well as through setting a vision for a more efficient and effective structure that meets the diverse needs of all students. This includes targeted efforts to obtain support from families and community members.

| Elementary School Illustration in Practice |
| --- |
| Our school's journey to integration and alignment started 5 years ago with an emphasis on culture and climate. Our principal's vision was to build a strong academic Tier 1 that aligned to state and national standards, as well as to develop a multi-tiered academic support team that intervenes with fidelity and has numerous resources for students at Tiers 2 and 3. The next step was to create a PBIS team that assisted with Tier 1 school-wide behaviors. Our SAP team has been an integral piece of the system when working with students at the advanced tiers, regarding both academic and behavioral support needs. |

**Strong foundation of SAP or multi-tiered frameworks.** One of the foundational elements of a district and/or building-level decision to explore integration and alignment of SAP and multi-tiered frameworks is to have established readiness, as demonstrated by implementation fidelity with at least SAP or MTSS/PBIS. Ideally, there should be formal evidence of fidelity, such as at Tier 1 for PBIS, and/or fidelity to the [SAP Components and Indicators](#). For some teams, engaging in the advanced training tiers will include a section on integration planning. Other teams that may already have existing and effective advanced tier teams are well-positioned to explore what integration may look like.

| High School Illustration in Practice |
| --- |
| Our school found success in implementing PBIS and reaching Tier 1 fidelity. There was a SAP team in the building at that time working separately. As the school looked at developing the framework at Tiers 2 and 3, multiple team meetings with parallel responsibilities were inefficient and ineffective. Through attendance at the PaPBS Implementer's Forum, the building team recognized the potential for alignment and engaged in further preparation and professional learning.<br>• Step #1 → New SAP team members were selected and trained, and a new coordinator was appointed. SAP team maintenance revealed areas for improvement, and the SAP team implemented action steps to improve fidelity to the Pennsylvania SAP model. |

> - Step #2 → All SAP team members, PBIS Tier 1 Core Team members, and administrators participated in a summer exploration meeting facilitated by the PBIS External Facilitator to begin conceptualizing an integrated model. The group met initially for 3 hours to solidify support, establish rationale, and identify needs and existing resources. Together the group looked at how the advanced tier team could "meld" with SAP and created a preliminary flow chart. Outcomes of the meeting were as follows:
>   - Follow-up meeting dates were scheduled weekly throughout the summer
>   - An action plan was generated to discuss roll-out in the new school year. The action plan included data needs and sources, common referral forms and process, training needs (cross training of PBIS 2/3 and SAP teams, staff training to include agency SAP Liaisons, how to raise parent and student awareness). Fidelity, outcome data, and program improvement plans were built into the action plan based on discussions about monitoring effectiveness.

*Readiness and Planning Guiding Questions*

Topical areas for discussion among those involved in establishing readiness and early planning include the following:

- Which initiatives (e.g., SAP, MTSS, PBIS) are currently being implemented with fidelity and in which buildings?
  - Note: This may be a factor in decision-making regarding whether alignment efforts will be building-specific or district-wide.
- What do team structures, roles, and responsibilities look like at each tier?
- What are the referral mechanisms and procedures, including routing processes?
  - Is there a need for a visual (e.g., flow chart) to clarify this for the team and school community?
- What are the mechanisms for data collection and documentation, including key decision points?
- What tools are needed for goal-setting and progress monitoring?
- What are the SAP, MTSS, and PBIS-related training needs of the following groups:
  - Newly integrated teams
  - General staff
  - Parents and families
  - Students
  - Community members
- What internal and external resources support alignment and integration, and has the LEA engaged in a formal resource mapping process?

*Resources*

- National Implementation Research Network: [Initiative Inventory and Process Tool](#)
- National Technical Assistance Center on Positive Behavior Interventions and Support: [Technical Guide for Alignment of Initiatives, Programs and Practices in School Districts](#)
- Pennsylvania Network for Student Assistance Services: [Student Assistance Program Best Practice Guidelines for Fidelity](#)
- Pennsylvania Network for Student Assistance Services: [SAP Members Survey for Improvement of Team Functioning](#)
- Pennsylvania's Schoolwide Positive Behavior Interventions and Supports System: [Training Readiness Checklist for Individual Schools](#)

Readiness and Planning

- SAP/PBIS Integration Comparison/Contrast Analysis Tool from or the Planning for SAP/PBIS Alignment and Merger from the [2017 SAP and PBIS Integration Practical Guidance Document](#)
- National Center for School Mental Health: [School Mental Health Quality Guide: Needs Assessment and Resource Mapping](#)

# Recommendations for Effective SAP Alignment with Multi-Tiered Frameworks: Teaming

Teaming is a critical component of alignment and integration efforts between SAP and multi-tiered frameworks at the district and building level. A team is an interdependent, multidisciplinary set of people that rely on each other to assess data, identify problems, create plans to solve these issues, implement plans with fidelity and evaluate outcomes. Additionally, team members support each other. The team creates a space that is safe for ongoing learning and uses structures that clarify roles and boundaries. Most importantly, team members find meaning in the work and see tangible impact on students, families, staff, and the entire school community.

*Key Themes and Illustrations*

**Leadership Team**. A leadership team, comprised of a diverse array of individuals in varying positions and roles, is critical to design, facilitate and manage alignment. Strong administrative buy-in leads selecting members for a common planning team. Key stakeholders are identified and engaged in dedicated meetings to begin discussing the mechanics of integration. Participants may include members of existing Child Study, Instructional Support Team (IST), Response to Instruction and Intervention (RtII), MTSS, PBIS Tier 1; PBIS Tiers 2/3; SAP, Systems Management or other related service teams.

**Cross Training of Teams.** Cross-training of team members is important to ensure a common language, shared understanding, and collective ownership among team members. It is also important to create a braided system that involves key stakeholders from affiliated agencies. This will require MOUs that clearly outline roles and procedures for collaboration. Emphasis may be placed on effectiveness and efficiency, particularly at advanced tiers. However, it is critical to acknowledge that outside professionals must adhere to their own agency policies and may be bound by additional legal mandates and regulations. Given that SAP liaisons, in particular, may have a role in assisting school teams at advanced tiers, the requirements, boundaries, and limitations of their role should be identified and discussed proactively.

**Effective Structure for Teaming and Meetings.** It is critical to determine which teams should remain distinct and which teams may be combined to eliminate undesired redundancy. With any teams that must remain distinct, it is helpful to have representation from key stakeholders from the integrated teams. The overlap of some team members can support the flow of communication and efficiency in executing tasks to prevent duplication of efforts.

Teams should have an established system to meet on a consistent basis and process referrals. The structure and frequency of team meetings may vary depending on the size of the building/district, grade levels, and resources. In addition to formal team meetings at set times, teams may also communicate informally as needed. Timelines may be impacted by a variety of factors that may need more formalized problem-solving.

| High School Illustration in Practice |
| --- |
| Two overlapping members currently sit on both our SAP and PBIS Tier 1 teams. The SAP/Tier 2-3 team meets formally every other week and includes a SAP Liaison. However, there is ongoing conversation between meetings for issues as they emerge. We also have a triage "mini-team" that was developed to expedite referrals and meets as referrals come in. This "mini-team" has three members that include an administrator, school counselor, and SAP Coordinator. The SAP Coordinator gathers information and consents from the |

> parent/guardian, as well as conferences with the student.  This triage "mini-team" works quickly to determine the best resources at Tiers 2-3 to meet referred students' needs.  For instance, with this triage process, we were able to implement a Tier 2 intervention within two days.

**District Illustration in Practice**

We have six mental health specialists that sit on SAP teams across the district.  We use district-hired social workers or school counselors to serve in this role of intervention specialists supporting teams at each of our buildings.  A county community SAP liaison agency supports our teams by conducting drug and alcohol screenings and assessments.

*Considerations for Teaming*

- Schools seeking to align SAP and multi-tiered frameworks may want to start with a teaming analysis activity to determine which teams are unique and which teams should be combined to eliminate redundancy.
- Active administrator membership and involvement is critical to ensure efficient action planning and allocation of resources to effectively integrate the SAP and multi-tiered frameworks.  This can help ensure the allocation of funding and time to support SAP and multi-tiered teaming, as well as intervention implementation and monitoring.
- Teams may develop a process map to delineate roles and responsibilities for effective integration and alignment.  The process map may incorporate the following to enhance efficiency and communication, and to prevent redundancy:
  - Each team's role in using a problem-solving approach to ensure effective meeting practices (e.g., clear purpose for the team, meeting roles, meeting agenda form)
  - The role of team members from external agencies (e.g., SAP liaisons), to clarify and set realistic and appropriate expectations for their participation (e.g., need to attend full meeting or part of a meeting, involvement in discussion about individual student needs only or other topics)
  - Each team's methods for problem-solving (e.g., analyzing data) and action planning
  - A system for sharing data across teams
  - A resource map or outline of available interventions, as well as entrance and exit criteria to support decision-making around SAP and multi-tiered supports
- The teams may develop a shared action plan to ensure effective resource allocation, consistent implementation of teaming practices (e.g., referral, intervention management, progress monitoring, fading/exiting criteria), and use of evidenced-based programs and practices to support students.
- Administrator involvement can help ensure communication with stakeholders, including the allocation of time to review the alignment with staff during a faculty meeting or professional development day.  This also includes communication with SAP liaison agency administrators about the role of SAP liaisons within an integrated or aligned model, and to identify any training needs pertaining to multi-tiered approaches.

*Resources*

- Algozzine et al. (2014), OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports: PBIS Tiered Fidelity Inventory (TFI)
- Center on Positive Behavioral Interventions and Supports (2019): PBIS District Systems Fidelity Inventory (DSFI)

Teaming

- Horner et al. (2015). The Team-Initiated Problem Solving (TIPS II) Training Materials
- Interconnected Systems Framework, Action Plan Template (blank)
- Interconnected Systems Framework, Aligning Teaming Structures = Working Smarter, Not Harder Worksheet
- Vermont Agency of Education (2019), Plan-Do-Study-Act (PDSA) Toolkit

# Recommendations for Effective SAP Alignment with Multi-Tiered Frameworks: Common Referral Process

Early identification and intervention lead to improved outcomes for students struggling with barriers to learning. In considering the alignment of SAP and multi-tiered frameworks, it is essential to consider the existing approaches to referrals, including how referrals are made and routed. Ensuring consistency at this phase of the process can create more equitable and efficient mechanisms by which students in need of supports can be identified. It is also important to educate staff, families, and students on what constitutes an appropriate referral and the process for doing so.

*Key Themes and Illustrations*

**Central referral mechanism.** Teams should consider establishing a single point of referral for staff, families and students seeking additional support. This was reported to be a key consideration for SAP and multi-tiered teams to consider moving toward integration and alignment. Feedback from schools also indicates that development and streamlining their referral process was iterative and ongoing for teams, sometimes over a period of years.

| District Illustration in Practice |
| --- |
| Four years ago, we created a universal Flag Form, which was created internally with support from our technology department. We continued to refine the form over a couple of years to capture all of the information that our teams needed. When a referral initially comes into a school counselor, it is determined if it needs to move to a higher level at which point the Flag Form is submitted. The form is completed online with basic information and then assigned a case manager. |

**Data-driven referrals.** There are many potential sources of referrals, including direct referrals that come from a specific referral source (person) and referrals that are drawn from multiple sources of data collected by the school. Frequent monitoring of the school data systems and dashboards with multiple sources of data provide opportunities for quick identification of student needs. Universal screening tools provided through Tier 1 help to identify struggling students that may not otherwise be identified.

| Elementary School Illustration in Practice |
| --- |
| Our main referral mechanism is through the use of a universal screener. We use Acadience to identify potential academic concerns and the Student Risk Screening Scale (SRSS) to identify potential behavior concerns. SAP referrals come from a combination of those two screeners, in addition to staff or parent/guardian referral. Additionally, any adult can refer a student directly to SAP. |

*Guiding Questions for Consideration by Teams Seeking to Establish Referral Procedures*

- Who can make referrals to either separate or aligned/integrated teams, and what is the procedure to make a referral?
- If the referral is submitted to a point person instead of a team, what are the criteria to determine whether a referral moves on to a team?
- Who is responsible for ensuring that each referral follows the process as designed?
- What are the timelines related to the referral process, including from time of referral to the team's review, and from referral to intervention?
- Is there a centralized referral form and how is this accessed (e.g., electronically, paper)?

- What information is included in this form (e.g., reason for referral, prior interventions, any parent/family contact made, etc.)?
- How is data systematically monitored and reviewed to identify and refer students?
  - Is there a comprehensive data dashboard to locate and use multiple sources of data to centralize referral reason, prior actions taken, and monitor progress?
  - Does the district/building use universal screening as a referral mechanism, and in what domains (e.g., academic, behavior, mental health, etc.)?
  - What criteria do teams use to refer students for mental health or drug and alcohol screening or assessment with SAP liaison?
- Who is responsible for acting as a lead contact for the referral to communicate with and engage the student and family?
- What global information informs referral for higher levels of support?

## Recommendations for Effective SAP Alignment with Multi-Tiered Frameworks: Family Engagement, Consent, and Confidentiality

Working in schools requires that professionals protect the health, welfare, and safety of the student, as well as that of the broader school community.  School teams must work to balance these efforts with the student and parent/guardian right to privacy.  Confidentiality of student information and parent/guardian consent are essential procedural components within both SAP and multi-tiered approaches.  Family engagement is also a core tenet of both SAP and multi-tiered frameworks and helps facilitate the success of both approaches.  The absence of family engagement can create significant barriers to accessing supports, thereby impacting student outcomes.  While consent and confidentiality policies and procedures are a component of family engagement, meaningful and authentic family engagement involves so much more.  To do so, schools must utilize approaches that are culturally attuned and relevant, strengths-based, and accessible.  In viewing families as partners, family engagement extends beyond one-way information sharing and resource dissemination, striving toward a bi-directional and mutually supportive relationship that promotes empowerment, choice, and shared decision-making.

*Guiding Questions for Consideration by Teams Regarding Family Engagement*
- How has the school/district communicated with families about SAP, multi-tiered frameworks, and related supports to address students' social, emotional, and behavioral needs?
    - Are information and services accessible to all students and their families?
    - Are families engaged in programs and activities related to these initiatives?
    - Do families have the opportunity to provide feedback, help promote, support the coordination of these efforts?
    - Have schools identified barriers to family engagement and identified programs/supports that are culturally responsive to families' needs?


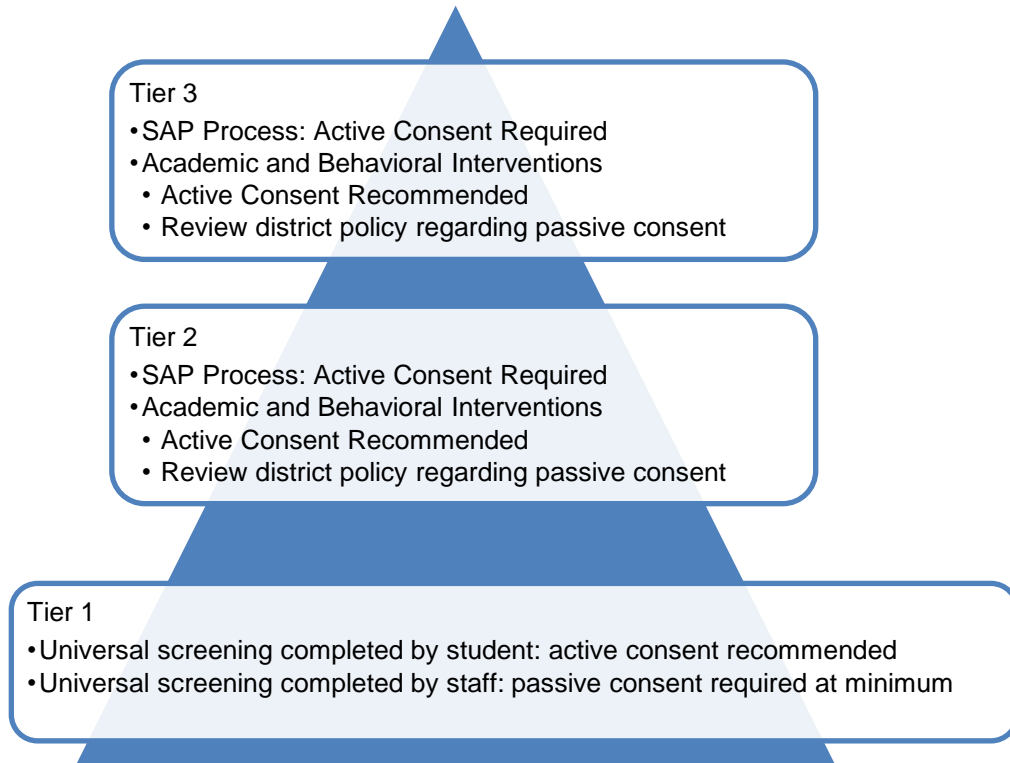*Establishing Procedures for Active Versus Passive Consent*
Active and passive consent procedures both seek to inform the parent/guardian of an activity or service that is being offered to the student.  **Active consent** (or "opt in") is commonly understood to mean that a parent/guardian must provide a signed, dated, written consent before his or her child can participate in a school activity such as a survey, analysis, or evaluation.  **Passive consent** (or "opt out") is understood to signify that consent is assumed after a parent is notified and given the opportunity to opt their child out of participating in a school activity.

In general, both active and passive consent procedures involve the distribution of a letter to the parent/guardian that informs them of the proposed intervention or activity for their student indicating whether this is being offered at the universal, targeted group, or individual level.  The consent form typically requires parent/guardian signature indicating whether or not they agree to their student's participation (active) or supplying a mechanism for refusing their student's participation (passive).  Note that in Pennsylvania, active consent is required for the SAP process, as outlined in the [Pennsylvania's Student Assistance Program: Frequently Asked Questions and Best Practice Responses](#).  Parent/guardian consent is also required for certain components of multi-tiered approaches, and schools should consult their solicitors around these requirements in accordance with the [Family Educational Rights and Privacy Act](#) (FERPA) and the [Protection of Pupil Rights Amendment](#) (PPRA).

The following graphic portrays the Pennsylvania's Department of Education's (PDE) guidance on active and passive parent/guardian consent within a multi-tiered framework.  The SAP

process for individual students requires active parent consent, and schools working to align their efforts will need to determine how SAP best integrates with their multi-tiered approaches at the advanced tiers (i.e., at Tier 2 and/or Tier 3).  SAP teams and initiatives may also align with multi-tiered approaches at Tier 1, as part of universal awareness and prevention efforts.

**Tier 3**
- SAP Process: Active Consent Required
- Academic and Behavioral Interventions
  - Active Consent Recommended
  - Review district policy regarding passive consent

**Tier 2**
- SAP Process: Active Consent Required
- Academic and Behavioral Interventions
  - Active Consent Recommended
  - Review district policy regarding passive consent

**Tier 1**
- Universal screening completed by student: active consent recommended
- Universal screening completed by staff: passive consent required at minimum

For schools working to align their SAP and multi-tiered efforts, schools must develop their policies and protocols for consent and confidentiality in accordance with federal and state laws and regulations, as well as their own local board policies for the collection, maintenance, and dissemination of student records.  Additional support (e.g., SAP, as well as Tiers 2/3 services and interventions) offered to targeted groups or individual students in schools is voluntary, and the rights and privacy of students and their parent(s)/guardian(s) must be protected.

Written notice is required for active or passive consent and should include the following:
- A description of the intervention or educational service
- Written language understandable to the general public
- Provided in the parent/guardian's native language
- Clear delineation of team members and roles, services to be provided, and skill development groups
- When behavioral health screenings are to be conducted, indication of who will have access to information, how information will be stored, and how information will be used should be included
- If SAP services are going to be provided, information regarding the SAP process and services

**Access to Confidential Information.**  The Family Educational Rights and Privacy Act (FERPA) outlines the legal requirements and parent/guardian rights pertaining to student educational records, both written and electronic.  Additionally, the Individuals with Disabilities Education Act (IDEA) provides guidelines pertaining to the protection of information for students with disabilities.  Specific Pennsylvania laws, as well as relevant school or district policies, also stipulate certain privacy protections for students.

SAP team members must adhere to confidentiality guidelines, and individual school staff members (e.g., school mental health professionals) must also follow professional and ethical standards regarding confidentiality.  When outside professionals sit on school teams (i.e., mental health or drug and alcohol SAP liaisons on a SAP team), they may be required to adhere to additional federal and state regulations around consent and confidentiality.  The SAP *Frequently Asked Questions and Best Practice Responses* provides additional information regarding which professionals can serve on a SAP team.

The term **legitimate educational interest** is also used to clarify the staff member roles and circumstances that allow access to student information and records.  In general, legitimate educational interest can be understood as **need-to-know** information required for a staff member to work effectively with a student, not "want" to know or based merely on curiosity.  There are fewer guidelines for the sharing of private information orally with staff.  Thus, school personnel may be provided with strategies to help a student to be more successful at school without necessarily having the right to information or details that may be sensitive or potentially embarrassing to the student and/or family.  When sharing information with teachers and other personnel in school, team members must consider the educational needs of the student in conjunction with the privacy needed to work through challenging issues related to student behavioural health and wellness.

Team members who have access to sensitive information about a student and their family must adhere to confidentiality regulations and guidelines unless there is potentially serious and foreseeable harm to the student or others.  In such instances, information may need to be shared with parents/caregivers, other school personnel, and/or others external to the school that may be in a position to help or protect the safety of the student or school community.

**Coordination of Resources.**  Often, multiple systems may be involved with a student and family.  Statewide, there is variation in the availability of community resources, such as county-funded SAP Liaison services and school or community-based mental health and drug and alcohol providers.  Particularly for students receiving services at the advanced tiers and their families, there is a need to expand partnerships with other youth-serving systems and improve collaboration to enhance service coordination.  However, community partners (e.g., SAP liaison agencies, providers, etc.) are bound by additional laws and regulations pertaining to consent, confidentiality, and release of records.

| High School Illustration in Practice |
| --- |
| Within our integrated efforts, there are many cohesive parts working concurrently, like a "spider web."  The SAP Coordinator maintains records, progress monitors all students receiving Tiers 2 and 3 services and uses a sub-team comprised of counselors, SAP Liaisons, and administrators to monitor data, refine action plans, fade or increase the intensity of services, and coordinate school-related issues with existing behavioral health care.  Students are identified by administrators when they have 3 or more Office Discipline Referrals (ODRs) or the administrator believes the student would benefit from services.  When |

> necessary, County Service Coordination and Interagency Meetings are scheduled to avoid service duplication when multiple systems are involved (Children & Youth, Mental Health, Juvenile Justice, etc.). Special education teachers formulate behavior plans when necessary, and work with regular education teachers, students, and families to implement, monitor and adjust services. Families are engaged for SAP/Tiers 2 and 3 services through consent procedures and periodic updates, with counselors making frequent calls and email contact.

**Who has access to written information about students?** Determining who has access to written and verbal information about students in schools can be a nuanced process and may vary on a case-by-case basis. The following guidelines may assist schools in their decision-making regarding legitimate education interest.

- Parents/guardians and eligible students hold the privacy rights to student records and have the right to review, challenge, and amend student records.
- At the age of 18 or when a student enters a post-secondary institution, the privacy rights are transferred to the student.
- School personnel with a legitimate educational interest include the following:
  - o MTSS team members, school counselors, administrators, and school psychologists only have access to the data from students specific to their building and caseload.
  - o Educational staff's access to Tiers 2/3 records are restricted to legitimate educational interest.
- Outside parties such as Agency SAP Liaisons may have access to review a specific student's Tiers 2/3 record as predetermined by a Letter of Agreement and signed consent from parent/guardian (see Pennsylvania's Student Assistance Program: Frequently Asked Questions and Best Practice Responses).

*Guiding Questions for Consideration by Teams Regarding Consent and Confidentiality Procedures*

For schools looking to align their SAP and multi-tiered approaches, local policies and procedures should take into consideration how the aligned efforts are structured at the district or building level with regard to teaming, referral procedures, types of data collected, and other components outlined in this document. The following questions may also be helpful for administrators and teams to consider:

- What general training is provided to school staff to support their understanding of confidentiality laws, regulations, and local policies?
  - o How are building or district-wide staff engaged in this process and given the opportunity to provide input, including the opportunity to learn about trends, challenges, and outcomes?
- What targeted training is provided to teams, administrators, and outside personnel (e.g., SAP liaisons) on their responsibilities regarding the different levels and limitations of confidentiality?
- What are the protocols for consent, confidentiality, and release of information for the sharing of student information by community agency professionals (e.g., SAP liaisons) that sit on school teams, attend team meetings, or collaborate with team members?
- What types of student information can and cannot be shared across teams and with other staff in the building that have legitimate educational interest?

- How are decisions made regarding what types of student information discussed at team meetings or shared with team members should be documented in educational records?
- How are records related to SAP and multi-tiered efforts stored to allow for the highest levels of confidentiality and what staff members have access to these records?

*Resources*
- Pennsylvania Department of Education, Basic Education Circular (2000). *Protection of Pupil Rights*
- U.S. Department of Education, *Family Education Rights and Privacy Act*
- U.S. Department of Education, *Intersection of FERPA and IDEA Confidentiality Provisions – March 2012*
- U.S. Department of Education, *Protecting Student Privacy: What is the Protection of Pupil Rights Amendment (PPRA)?*

# Recommendations for Effective SAP Alignment with Multi-Tiered Frameworks: Data-Based Decision-Making and Documentation

Data sources, as well as team approaches to data collection and analysis to inform decision-making, may vary widely. Both in SAP and in multi-tiered frameworks, documentation of processes and procedures, as well as of decision-making for student action planning and intervention monitoring, is essential to uphold the overarching goals of each approach. Outcomes include both student outcomes and fidelity measures and performance reporting to improve team processes. Data collection and related documentation occur at the student level and are used to drive decisions regarding interventions and supports at key decision points and through progress monitoring within both SAP and multi-tiered approaches. This fuels the problem-solving process. Additionally, documentation supports effective team functioning in serving as a record and reference point for action steps and timelines.

## *Key Themes and Illustrations*

**Utilize multiple sources of data.** It is essential to identify the data sources that will be used by teams for decision-making, including the mechanism for collecting and analyzing data at team meetings to prevent redundancy. Decisions should be based on multiple data sources which may include, but are not limited to academic performance, ODRs, nurse visits, attendance, requests for assistance, direct observations, behavior checklists, universal and/or targeted screening data, and the Pennsylvania Youth Survey (PAYS).

> **High School Illustration in Practice**
>
> We monitor student data comprehensively using five sources to analyze individual and schoolwide patterns. When a student is referred to SAP, one team member retrieves data from multiple in-school data sources and combines them into a Google Sheet (SAP File) for the student. The team meets to review these data, also pulling in data from our other systems, PowerSchool and EdInsight. School Wide Information System (SWIS)data is monitored for global trends and is also used to identify students that may need to be referred to SAP. We also review data through Alternative Behavior Educator (ABE), an online behavior documentation system that allows classroom teachers to record minor behavioral infractions and records teacher-initiated, universal strategies attempted with a student. ABE also allows teachers to document information from the student and parent perspective, and the system can be accessed by teachers, counselors, and administrators to coordinate with other staff, monitor progress, and update interventions. To obtain the parent/caregiver perspective of the student's school-related issues, the team schedules face-to-face or telephone SAP conferences to engage them in the solution-building process. The student meets with either the SAP Coordinator, school counselor, or special education case manager to determine their perspective of the school issues, identify needs, and promote buy-in with the action plan. All information is kept confidential in a restricted access file.

**Establish decision points for supports.** Teams should have well-defined entrance and exit criteria for SAP and accessing multi-tiered supports to ensure decisions are informed by data. This includes how students are identified in need of supports and matched with interventions, how intervention fidelity is monitored, how student response to intervention is progress monitored, how interventions are faded, and how students are exited from interventions. It is also important to monitor the management of the system, identifying system-level concerns versus individual student concerns to ensure effective resource allocation (e.g., the number/percentage of students who are receiving Tiers 2/3 and SAP supports).

| Elementary School Illustration in Practice |
|---|
| Social-emotional learning lessons take place throughout the year in every classroom at the Tier 1 level, with all students receiving this universal support.  A universal screener (SRSS) is completed three times a year, and intervention groups are built from that data.  Groups run for six weeks, at which point the SRSS is completed again.  Then, new groups are established and run for six weeks, and the cycle repeats.

For students receiving academic supports at Tier 2 or Tier 3, we are able to provide interventions to students immediately following universal screening.  We have established cut points for students and monitor trend lines to understand students' score patterns. |

**Progress Monitoring.** Teams must work to ensure that interventions are structured within a clear timeline to evaluate progress and making plan adjustments.  Explicit focus on progress monitoring is essential, given that many academic and behavior interventions implemented within the school setting require 6-8 weeks to demonstrate stabilization of a decline or improvement.  For students referred to mental health or drug and alcohol services based on SAP liaison recommendations as part of the SAP process, teams must understand that treatment outcomes may not be observed within this same timeframe.

With school interventions, there are indicators that suggest a student may need more intensive levels of support within a week or two of intervention implementation; however, this is not necessarily the case with treatment.  Teams will need to establish procedures for the frequency of progress monitoring for each student and the intervention(s) they are receiving, as well as the specific outcomes that are monitored to indicate improvement.  For students receiving mental health or drug and alcohol treatment, the team may identify indicators of functional improvement within the school setting (e.g., attendance, grades, behavior, etc.) for monitoring purposes.  Should the student's action plan require correction, certain team members may informally communicate to make needed adjustments.

| High School Illustration in Practice |
|---|
| Progress is monitored on all students involved in SAP and Tier 2/Tier 3 services at least once per nine weeks.  We use Google Sheets to document progress monitoring for individual students, to be able to view the student's improvement, stabilization, or decline in performance.  Additionally, we prioritize student monitoring based on intensity.  Some students with a higher level of need may have their progress reviewed weekly.  Other students whose performance is stable or has improved will receive monitoring less frequently.  When a red flag emerges (e.g., Office Discipline Referral, uptick in absence, decline in grades), the team immediately revisits the action plan. |

**Maintain documentation electronically.** When documentation is maintained electronically and centralized within one system, it can support more functional use of data for decision-making purposes, as multiple sources of data become more accessible for use and review.  Furthermore, this supports more streamlined data collection procedures and timely follow-up.  At the same time, teams should be mindful of legitimate educational interest and what staff members have a "need to know" regarding student data and information.

| District Illustration in Practice |
|---|
| All information that supports our SAP/MTSS structure is built into our online Flag Form.  All communication is noted here, including communication with the student, parent/family, and |

team.  If the team believes that a student may be in need of an evaluation (e.g., 504, special education), data can be forwarded to the appropriate individuals for review and approval.  There is a mechanism to close the case or keep it open.  Additionally, if a Flag Form was completed for a student at the elementary level, it can travel to the next school to support transition.  As additional interventions are put into place, these are continuously documented.

**Elementary School Illustration in Practice**

After completing the MTSS integration series through PaTTAN, we developed a dashboard program that tracked on/off track success patterns for all students within the school.  The system is used to view the "bigger picture" and can help our teams examine patterns within classrooms, tiers of intervention, or the entire student body.  Since creating our dashboard (i.e., an electronic excel file), we can view attendance, disciplinary data, academic data, and mental health-related concerns in one place.  This has been a particularly useful tool when referring students to SAP.

*Guiding Questions for Consideration by Teams Regarding Data and Documentation*

- What format are data in to ensure ease of analysis (e.g., graphs, trend lines, easily accessible by relevant stakeholders)?
- How is the team examining data to evaluate over or under identification of students from diverse backgrounds?
- Is the team using a standardized process to support decision making to ensure decisions are based on data and that the fidelity and efficacy of intervention implementation is monitored?
- What platform(s) and/or technology can be utilized to help streamline data collection and access to information for team decision-making?
- What specific tasks will be documented by whom, and what staff members will have access?
    - Teams may consider how they will document any or all of the following: student referrals, parent/guardian contact and consent, screening, data utilization, recommendations for intervention, progress monitoring, and follow-up within their aligned and/or integrated structures.
- In what form are SAP and PBIS/MTSS records stored and maintained (e.g., electronically, hard copy, both) to ensure access while also maintaining confidentiality?
- What are the specific procedures for progress monitoring?
    - How are these procedures documented for reference by the team (e.g., timeline, flow chart)?
- For individual students, what sources of data are used for progress monitoring to determine whether functional improvement has been made?

**For more information, please contact your SAP Regional Coordinator or RA-PAOMHSASStuAsstPr@pa.gov**