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Procedures for Collaborating with Private Instructional Personnel

Observation Only

These procedures are not required when a guardian would like for a private provider to **observe a student without providing therapy**. In this situation, the private provider must gain school access as a “volunteer” using the School Access Form (<https://stjohns.keepntrack.com/apply>). Once approved, the private provider signs in as a “Volunteer” and selects “Observation” as the activity. At least 24-hours prior to the observation, the guardian should contact the school administrator to schedule an agreed upon visit. Visits should be scheduled in a manner that minimizes the student’s loss of instruction. Please note that volunteers may not provide therapies or disciplinary action or be alone with students.

Individual Therapy

When a guardian wishes to bring into the school a non-school board employee **to provide individual therapy** for a student in addition to any therapy required by the IEP, this person will be referred to as Private Instructional Personnel. We welcome the opportunity to collaborate with private instructional personnel who are serving our students. In this situation, the private provider must qualify based on Section 1003.572, Florida Statute. The private provider must also gain school access as a “Vendor” by completing a fingerprinting process through the district office. The first three sections below explain the Florida Statute and St Johns County policy. The fourth section explains procedures for collaboration.

1. Section 1003.572, Florida Statute, defines private instructional personnel to mean:
 - a. Individuals certified under s. 393.17 or licensed under chapter 490 or chapter 491 for applied behavior analysis services as defined in ss. 627.6686 and 641.31098.
 - b. Speech-language pathologists licensed under s. 468.1185.
 - c. Occupational therapists licensed under part III of chapter 468.
 - d. Physical therapists licensed under chapter 486.
 - e. Psychologists licensed under chapter 490.
 - f. Clinical social workers licensed under chapter 491.
2. The collaboration of public and private instructional personnel shall be designed to enhance but not supplant the school district's responsibilities under the Individuals with Disabilities Education Act (IDEA). The school as the local education agency shall provide therapy services to meet the expectations provided in federal law and regulations and state statutes and rules. Collaboration of public and private instructional personnel will work to promote educational progress and assist students in acquiring essential skills, including, but not limited to, readiness for pursuit of higher education goals or employment. Where applicable, public and private instructional personnel shall undertake collaborative programming. Coordination of services and plans between a public school and private instructional personnel is encouraged to avoid duplication or conflicting services or plans.

3. Private instructional personnel who are hired or contracted by parents to collaborate with public instructional personnel must be permitted to observe the student in the educational setting, collaborate with instructional personnel in the educational setting, and provide services in the educational setting according to the following requirements:
 - a. The student's public instructional personnel and principal consent to the time and place.
 - b. The private instructional personnel satisfy the requirements of s. 1012.32 or s. 1012.321.The provision of private instructional personnel by a parent does not constitute a waiver of the student's or parent's right to a free and appropriate public education under IDEA.

4. Procedures for Collaboration with Private Instructional Personnel:

Step One - Notify School - The guardian must inform the school administrator that they are requesting to bring private instructional personnel into the school. The guardian will be provided a copy of our procedures to be shared with the private provider.

Step Two – Validation - All private instructional personnel must provide proof of certification or licensure as described in Section 1003.572 Florida Statute to the ESE Director (or designee). Information should be faxed to (904) 547-7544 along with a brief statement describing the student's name, school and the type of service that will be provided. School administration and applicants will be emailed regarding the results of validation.

Step Three – School Access - All private instructional personnel must complete the fingerprinting process through the St Johns County School District (contact Vicky Eidsmoe in the Human Resource Department at vicky.eidsmoe@stjohns.k12.fl.us for details). Once approved, the private instructional personnel signs in as a “Vendor” and selects “PIP” as the activity. Please note that a vendor is permitted to be alone with a student, observe the student and/or provide therapy.

Step Four - Parameters

- a. **Scheduling** – The parent must contact the school administrator to schedule the session at least 24-hours prior to a proposed visit.
- b. **Frequency/Timing** – Visits should be scheduled in a manner that minimizes the student's loss of instruction and minimizes the amount of disruption to classroom culture.
- c. **Confidentiality** – The parent and the private entity must respect the confidentiality of other students at all times.
- d. **Solicitation** – Solicitation of services by the private entity is limited to leaving information with school administration.
- e. **Communication** – Any information to be exchanged between the school and the private entity must be transferred through the guardian. Even when a “Release of Information” form allows such communication, the school will typically respond through the guardian.
- f. **Interactions with Students** – The private entity must minimize interactions with other students and may not involve them in the therapeutic process (involving them in group session, offering them tangible rewards, correcting them).
- g. **Interactions with Staff** – The private entity must minimize interactions with staff that would interrupt the flow of instruction or compromise the teacher's authority within the classroom. If the private entity would like to discuss an observation with staff, then the private entity must have the parent schedule a meeting.