



Exceptional Student Education

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Procedures for Collaborating with Private Instructional Personnel 7-6-26

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1. Observation Only Clearance

If a guardian would like their private provider to observe a student without providing therapy, then the private provider must gain school access clearance as a "Volunteer". The provider would not need to qualify as Private Instructional Personnel for this purpose. Use the following link to complete the District Volunteer Application:

apps.raptortech.com/Apply/OTY0OTplbi1VUw==

Once approved, the guardian must contact the school administrator to schedule the observation, and the private provider signs in at the school as a "Volunteer". Schools need advance notice of at least 24 hours to accommodate observation requests. During the observation, the volunteer should minimize interaction with staff and students. Volunteers are not permitted to provide therapies or provide disciplinary actions or implement restraint. A staff member must always be with the volunteer when students are present.

2. Therapy Clearance

If a guardian wishes to bring a private provider into the school to provide individual therapy for a student (in addition to any therapy required by an IEP), the private provider must qualify as Private Instructional Personnel. There are three steps to be cleared as Private Instructional Personnel.

First, the private provider must meet criteria based on Section 1003.572, Florida Statute which defines private instructional personnel to mean:

The St. Johns County School District will inspire good character and a passion for lifelong learning in all students, creating educated and caring contributors to the world.

- 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. Registered behavior technicians who have a nationally recognized paraprofessional certification in behavior analysis and who practice under the supervision of individuals described in paragraph (a) by assisting and supporting such individuals in the provision of applied behavior analysis services. To provide services under this section, a registered behavior technician must be employed by a provider described in paragraph (a).
- c. Speech-language pathologists licensed under s. 468.1185.
- d. Occupational therapists licensed under part III of chapter 468.
- e. Physical therapists licensed under chapter 486.
- f. Psychologists licensed under chapter 490.
- g. Clinical social workers licensed under chapter 491.

Second, the private provider must gain school access clearance as a “Contractor”. Use the following link to complete the Background Screening Process:

[Background Screening Process for Contractors and Vendors – Background Screening](#)

This process includes completing the “Clearinghouse Request for Information Form”. Once completed, a copy of the form must be delivered to the Background Screening Department. This can be done via fax, mail or in person (see the link for details). This process also includes fingerprinting. There is a fee for this service and there is a link to check your clearance status. Those approved as “Contractors” will be issued a badge that can be picked up at the district office. Please remember that a contractor must also present their driver’s license when being signed in at the front desk.

Third, the private provider must email George Freeman george.freeman@stjohns.k12.fl.us to be added to the “**Approved Private Instructional Personnel**” list. This is the list that schools reference to verify who is approved. When emailing, be sure to include the following information: your name, company name, email address, phone number, and certification or licensure level. The “Approved Private Instructional Personnel” list can be found using the following link and looking in the middle of the page for “Approved Private Instructional Personnel”.

[Cleared Contractors List – Background Screening](#)

3. How do I Sign-In at a School?

Approved Private Instructional Personnel do not sign in at the school’s kiosk like volunteers. Instead, Private Instructional Personnel are signed in by front office staff as “Contractors”. Please remember that private instructional personnel must present their contractor badge and their driver’s license when signing in at the front desk. See procedure 8 in this document for details about signing-in for field trips.

4. What if I already have an active badge from another public school district in Florida?

If you were fingerprinted **ON OR AFTER 4-7-25** then you are in the Clearinghouse system. You will need to complete the “Clearinghouse Request for Information Form” (see section 2 for details). So long as your fingerprints are active you will not need to complete the fingerprinting process again. Once cleared, your badge will be accepted in St Johns County

schools. Please remember that a contractor must also present their driver's license when being signed in at the front desk.

If you were fingerprinted **PRIOR TO 4-7-25** then you are on the old system. You can remain on the old system until your fingerprints expire. For your current badge to be accepted in St Johns County schools, you will need to provide the following information: your legal name, a copy of the front and back of your current badge, your date of birth, and the last 4-digits of your social security number. Options for delivering this information include: by email at fingerprintingresults@stjohns.k12.fl.us (attn: Background Screening), or by fax 904-547-7605 (Attn: Background Screening), by mail to 40 Orange Street, St Augustine, Florida 32084 (Attn: Background Screening), or in person at 40 Orange Street, St Augustine, Florida 32084 (Attn: Background Screening). Once cleared, your badge will be accepted in St Johns County schools. Please remember that a contractor must also present their driver's license when being signed in at the front desk.

5. What Do I Do If My Legal Name Changes?

If your legal name changes, please call the Clearinghouse (850-412-4700) and select #1 to let them know about the change. They will require a copy of the legal document changing your name and may need your "Person ID#" (this is your 7-digit Clearinghouse number). Once that is completed, email George Freeman at george.freeman@stjohns.k12.fl.us to check for the update and list your new name on the "Approved Private Instructional Personnel List".

6. What if my fingerprints are about to expire?

Once completed, your fingerprints are good for five years. Consider redoing your fingerprints two months prior to their expiration date. See section 2 for the clearinghouse link and related details. Once completed, remember to send a copy of the clearinghouse form to our Background Screening Department.

7. How do I Schedule Therapy at a School?

To schedule "Approved Private Instructional Personnel" to provide services at a school, the guardian must contact school administration and propose a therapy schedule. The school administrator reviews the proposed schedule and verifies consent from public instructional personnel (the teacher) regarding the time and place. The school administrator considers the number of students and adults in the classroom and seeks to minimize loss of instruction for the student. The collaboration must not interfere with the school's ability to provide a Free Appropriate Public Education (FAPE). A therapy schedule is approved for a specified duration, and progress is reviewed prior to the schedule expiring. At that point, the school administrator determines if the therapy schedule will remain the same or be modified. Administrators are aware that services from private instructional personnel are often provided in the clinic, the community, the home, and at school. If the natural environment of a classroom is not appropriate for the therapy, then a private location may be provided in a limited fashion by the school administrator. Schools need at least a 24-hour notice to review and approve a proposed therapy schedule. Private instructional personnel are not permitted to deviate from their approved schedule. Any changes to the schedule require prior approval by the school administrator.

8. How do I Schedule BACB Supervision at a School?

It is understood that an RBT and a BCaBA will require BACB supervision to maintain their credentials. This supervision can occur in a limited fashion during therapy sessions at school. The person providing BACB supervision must qualify as “Approved Private Instructional Personnel”. The supervision schedule requires the approval of school administration (see section 7). Telehealth supervision can only be provided if the private instructional personnel is already providing therapy alone in a room with the student who they were hired by the parent to support. A student is not moved from the natural environment to a private location for the sole purpose of telehealth supervision to occur. Telehealth supervision is not permitted if other students or staff are present. It is the responsibility of the private instructional personnel to provide the equipment needed for telehealth supervision to occur. BACB supervision is not considered necessary for the collaboration between public instructional personnel and private instructional personnel to occur.

9. Can I Provide Therapy During a Field Trip?

Approved Private Instructional Personnel are permitted to provide therapy during some Field Studies (field trips). This requires advance approval from the school administrator. Approved Private Instructional Personnel must provide their own transportation to and from the field study site, as St Johns County School District does not provide transportation for them. When meeting the student at the field study site, there is no need to sign-in or sign-out from the school (so long as permission from school administration was obtained prior to the event). When meeting at the school to ride with a non-school employee to a field study site AND leaving a personal vehicle in the school parking lot, then then signing-in and signing-out at the front office is required.

10. Can I Provide Therapy During an Extended Day Program?

Extended Day programs in St Johns County Schools fall into two categories: those sponsored by the St Johns County School District and those sponsored by private companies. Those sponsored by the St Johns County School District allow Approved Private Instructional Personnel to provide therapy according to our Procedures for Private Instructional Personnel. In this case, the Extended Day Coordinator is the school administrator whose approval is required for the therapy schedule. Those programs sponsored by private companies are not bound by the school district’s Procedures for Private Instructional Personnel. Parents are encouraged to contact the private company to learn their procedures for allowing therapy to take place during their program hours.

11. What Does “Collaboration” Mean?

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.

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 Appropriate Public Education under the IDEA.

12. Additional Collaboration Guidance

- a. Behavior Plans – It is important to ensure that there are no significant conflicts between a private behavior plan (implemented at the school by private instructional personnel) and a school behavior plan (implemented by school staff). When conflicts do occur, a meeting should be held to review both plans and determine steps for resolving the conflict. Matching the language and strategies used at home and at school can positively impact a student's learning.
- b. Charter Schools – Charter schools are not bound by the district's clearance process. Guardians should contact the specific charter school to learn their clearance procedures.
- c. Communication with Guardians – Any information exchanged between the school and private instructional personnel must include the guardian. Even when a "Release of Information" form allows such communication, the school will typically respond through the guardian. The guardian is an integral voice in their student's education.
- d. Confidentiality – Private instructional personnel must always respect the confidentiality of all students. They are not permitted to take pictures or videos or sound recordings of students or staff. The only exception is when the therapy session is in a private room with the one student they are serving, and no other students are present, and the guardian has given permission.
- e. Discipline of Students – Private instructional personnel are not permitted to provide disciplinary actions for students.
- f. Disruptions – Private instructional personnel must avoid talking or other behaviors that would disrupt the flow of classroom activity. Sensory diet or sensory input procedures performed on a student are typically provided in a private location.
- g. Dual Therapies – Private instructional personnel are not permitted to provide therapy when a student is actively receiving therapy from public instructional personnel (Counseling, Language, OT, PT, Speech, and other public instructional personnel therapies).
- h. Interactions with Students – Private instructional personnel must minimize interactions with other students and may not involve them in the therapeutic process (involving them in group sessions, offering them tangible rewards, correcting them).

- i. Interactions with Staff – Private instructional personnel must minimize interactions with staff that would interrupt the flow of instruction or compromise the teacher’s authority within the classroom. It is best to schedule a conversation with a teacher at a time when the teacher can focus on the conversation and the guardian can participate. Staff do not collect data or complete forms/assignments for private instructional personnel.
- j. Monitoring PIP – Private instructional personnel have “contractor” clearance which means they do not require monitoring by school staff. They are permitted to be alone with the student they are serving.
- k. Prompt Hierarchy – The following describes a typical hierarchy for prompting a student. The teacher provides a whole group or individual prompt to the student. If the student doesn’t respond, then the assigned paraprofessional prompts the student (if the student has one). If the student still doesn’t respond, and the teacher and para are agreeable, then private instructional personnel may offer to prompt the student through the task. Afterwards, the prompt hierarchy resets. A teacher may ask PIP to step back temporarily while the teacher assesses the student’s level of performance. Afterwards, the teacher alerts PIP that therapy can resume.
- l. Restraint/Seclusion – Private instructional personnel are not permitted to implement restraint or seclusion procedures on students, and they are not permitted to assist during crises.
- m. Schedules – The PIP can’t deviate from their approved schedule without prior approval from the school administrator.
- n. School Requests of PIPs – Private instructional personnel work for the parent and are funded through the parent’s resources. They do not work for the school system. Therefore, school staff avoid asking private instructional personnel to perform any tasks with students. At times, a teacher may ask private instructional personnel to refrain from providing therapy for a specified amount of time while the teacher assesses a student’s level of performance.
- o. Solicitation – Solicitation of services by private instructional personnel at school is limited to leaving information with school administration.

13. Who Do I Contact For Assistance?

George Freeman serves as the school district support for parents and private instructional personnel and schools. Please email him at george.freeman@stjohns.k12.fl.us for questions about qualifying credentials, the clearance process, or questions about