2026-2027
Private Instructional Personnel (PIP)
Registered Behavior Technician (RBT)
Questions and Answers

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Section I
Packet Questions

1. Once the PIP packet is reviewed and accepted, where is the packet to be maintained?

(A) A PIP packet is a student record. This packet is housed at the student's school and placed in the student's cum folder. The packet is not uploaded to ESE management system.

2. If a student moves from one school to another does the PIP/RBT need to complete a new packet?

(A) See page 4 of the **PIP** Packet.

3. If a PIP or RBT is a PIP/RBT for more than one school, does the PIP/RBT need to complete more than one packet?

(A) Yes, a packet is required for each student where services are being provided.

4. How many packets can be submitted for one student?

(A) There is no limit to the number of packets that can be submitted by a parent for a student.

5. Is there a turnaround time that the schools must respond to the PIP Packets?

(A) The approval process may take up to 30 calendar days. Any requests by administration for additional documentation may extend the timeline.

Section II
Badge/Security

6. **Is it required for the vendor badge to explicitly state Private Instructional Provider, and can a Florida Public Schools Contractor's Badge be accepted in lieu of a Vendor Badge?**

   (A) The vendor badge should state Private Instructional Provider. A vendor badge is only obtained after Level 2 security clearance. If a provider has a vendor badge, this requirement has been met. Please note a Florida Public Schools Contractor's Badge cannot be accepted in lieu of the BCPS Vendor Badge because…

   - As per Florida Statute 1012.467, a Florida Public Schools Contractor's Badge allows the person to have access to school grounds when students are present. ***It does not allow the PIP/RBT to have direct contact with students.***
   - As per Florida Statute 1012.465, the Vendor Badge issued by Broward County Public School District allows the PIP/RBT to have access to school grounds when students are present and direct contact with students because the applicant has met level 2 screening requirements.

7. **Can a PIP/RBT forego the requirement to complete the Level 2 security clearance in Broward County Public Schools?**

   (A) No. All individuals must complete the process in Broward which includes receiving a Level 2 screening and vendor badge issued by Broward County Schools.

8. **Is the Behavioral Health Partnership the same as the PIP/RBT process?**

   (A) No. The Behavioral Health Partners are cleared through the District and do not need to complete the PIP/RBT process. For more information on Behavioral Health Partnerships http://bcps-esls.com/html/BHP_Provider_List.php

Section III
Observations/Services/Plan of Care

9. Who decides the schedule for the RBT/PIP in the school setting?

(A) According to Florida Statute §1003.572(3)(a), the student's public instructional personnel and principal consent to the time and place.

10. Are RBTs/PIPs allowed to service Gen Ed students?

(A) No. Florida Statute §1003.572 applies only to students with an IEP.

11. What do you do if the PIP/RBT is taking pictures and videos in the school setting?

(A) PIPs/RBTs have signed an agreement acknowledging that pictures, videos, and audio recordings are not allowed. Administration should meet with the RBT/PIP, address the concern, and inform the provider that any future violation may result in rescission of access to provide services in the school. Utilize the rescission letter as appropriate.

12. Is there a limit of how many observations can be done by a PIP/RBT?

(A) The statute in regard to collaboration of public and private instructional personnel, is silent to the number of times, the number of days or anything specific regarding the scheduling of these services/observation. Schedules are determined by public instructional personnel and administration.

13. Does insurance billing/coverage determine a PIP's schedule?

(A) No. This is between the principal and public instructional provider.

14. Can a PIP/RBT be present for State and/or District Testing?

(A) PIP/RBTs will not be present for any state or district testing.

15. Are PIPs/RBTs allowed to attend field trips with the student?

(A) Participation in field trips is at the principal's discretion. The amount of time, location of service, and schedule for the service is subject to agreement between the principal and public instructional personnel. If they are attending, the RBT/PIP should meet the student/class at the field trip location, cover the cost of their own ticket/admission/etc. and cannot be counted as a provider.

16. Can individuals who do not meet the criteria of PIP/RBT observe in the classroom setting?

(A) Observations are possible outside of the PIP/RBT processes. The observations must follow the guidelines established in the BTU's collective bargaining agreement.

17. If a PIP/RBT have been approved and provide services on a school campus, is the school required to have a staff member present during the provision of services?

(A) The PIP has been determined to meet the Level II clearance requirements and can be alone with the child in the school setting. Although an RBT has been determined to meet the Level II clearance requirements, an RBT must provide services where an SBBC staff member is present.

18. Does the principal have the right to designate a place where services are provided for PIPs/RBTs?

(A) It is the decision of the building administration to determine the schedule and location for where services are to be provided. There are services that would not be appropriate in the classroom. If the service is something where the student needs to be in their regular programming and the

principal and teacher agree (such as behavior therapy), then the classroom might be the best location.

19. Can a PIP/RBT supplant student needs determined by the IEP team?

(A) Florida Statute §1003.572(2) states: 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.

The School Board is required under IDEA to provide FAPE to any student with a PIP. The PIP shall not replace or supplant the district's educational obligations to meet the student's unique needs. The principal's review and approval is required to ensure that the request from the parent is not based on student need but rather parent request.

20. Do parents of children NOT receiving PIP/RBT services have the right to restrict a PIP/RBT from coming into their child's classroom?

21. (A) No. However, if services provided to another student becomes disruptive, administration must address the concern. **Must the child have behavior goals or a BIP in order for a BCaBA/RBT therapist to be able to provide services?**

(A) No. It is not mandatory for a student to have a BIP and/or behavior goals. However, it is a time to look at the student to see if the child is exhibiting behavior concerns within the school setting. If the child is, this should be addressed.

22. Why is it important to receive private plans of care and/or behavior plans?

Please read the relevant section of the statute below.

(A) Florida Statute §1003.572 Collaboration of Public and Private Instructional Personnel:

(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.

The last two sentences clearly states that programming should be collaborative and encourages that this collaboration can avoid duplication or conflicting services OR plans. Meaningful collaboration cannot occur without sharing plans.

23. Can an RBT begin to work in a school without an FBA/BIP where behavior is addressed through goals?

(A) The RBT (or supervising Behavior Analyst) should provide the school with the plan that they will be implementing in the school in order for us to determine if it is in alignment with/does not contradict the behavior goals/strategies that the school is implementing. No PIP/RBT can begin to work with

a child in the school setting during instructional time without collaboration about what it is they will be doing with the child and what the teacher can expect to see in the classroom, etc.

Parents may request and complete a packet for students who do not currently have an FBA/BIP. School staff should discuss and confirm that there is not a need to address behavior by school staff (check to see if there are goals, observe in the classroom to see the teacher has a "defacto" behavior plan in place that should be formally written). If there is a need, the school must initiate a reeval, evaluate for an FBA and consider the need to add behavior goals to the IEP. However; there are times when there are no concerns in the school setting, there are no behavior goals and there is no FBA/BIP. In these instances, if the parents request, a PIP/RBT can provide support in the school setting.

24. How can my Behavior Program Specialist assist with the PIP/RBT Packet?

(A) Although the Behavior Program Specialists do not have the responsibility of reviewing the provider's packet and assessing their eligibility, they can assist staff with questions related to whether the individual behavior plan is suitability for implementation in a school environment for all students with disabilities, regardless of whether they have a district-based FBA/BIP or not. Whenever a PIP/RBT is requested for a student without a school-based plan, the IEP team should consider if the student's behaviors are impacting their access to education, and if an FBA/BIP is needed.

25. **Are RBTs allowed to be supervised by individuals other than a BCBA, BCaBA, or BCBA-D?**

(A) On a case-by-case basis, a Marriage & Family Counselor, Mental Health Counselor, or Clinical Social Worker (CSW), may be able to provide supervision for an RBT. Approval for an individual with these licenses must be obtained by collaborating with Principal or designee.

26. Prior to developing a BIP for home, can a BCBA who has a completed and approved PIP packet come into the schools to conduct trials in order to collect data, to use in the development of a BIP?

(A) Given that the statute allows for observations, if they have completed a packet, they should be able to come in to observe and collect data. Any data collected must be shared with the school.

27. How often is a Plan of Care reviewed?

(A) A Plan of Care/Behavior Intervention Plan will be shared with the school upon submitting the application and whenever a change(s) is/are made to the plan. The school may collaborate with the Behavior Program Specialist to assist them with questions pertaining to the alignment of the private and school-based BIPs so there are no anticipated conflicts between the plans.

28. How is the PIP/RBT data being provided to the school?

(A) Each school-based team should establish a plan and system to obtain data collected by the RBT/PIP in the school setting. This data becomes a student record and must be maintained by the school, it is recommended that the provider submit data on a weekly basis.

29. Prior to Senate Bill 1108, private providers were allowed to observe a student in a classroom in accordance with the teacher contract. Does this legislation replace the current practices for observation?

(A) No, parents have always been entitled to request an observation through school-based administration in accordance with the teacher contract guidelines. Parents may still utilize this process for observations. However, if the parent is requesting ongoing observations, collaboration and provision services of ESE students by a PIP, they must complete the application process. Private Providers, who have completed the application process and have been approved, will not be required to be escorted by a school board employee while they are on campus and will be allowed to work with the child alone.

30. If the parent completes the application process for a PIP/RBT and coordinates with administration to provide services in the school setting, are these services addressed on the IEP?

(A) No, privately provided services that the IEP team has not determined to be needed for the student to receive a Free Appropriate Public Education are not recorded on the IEP. It is important for IEP teams to ensure that a student receives the services needed to make meaningful progress. The only services recorded on the IEP are the services provided by school district staff.

31. Can the PIP provider bill Medicaid for services rendered in the school setting?

(A) Medicaid billing questions for the PIP provider should be addressed with the agency providing the services. Regarding school-based Medicaid Reimbursement, services provided directly by the school district, the SBBC waits at least 8 weeks to submit billing for Medicaid services to allow time for community providers to submit their billing. This helps ensure community providers are paid for services provided to your child.

Section IV
Aftercare

32. Can PIPs/RBTs provide services during before and after-school programs?

(A) For District operated before and after-school programs. There is no requirement to allow PIP/RBTs to provide services during before and/or after-school programs. However, School Principals are in charge of the before and after school programs located on their individual campuses, therefore if the Principal agrees to allow a PIP/RBT to provide services during these programs, it is permissible. Parents and PIP/RBTs would have to complete the same application, Level 2 clearance, etc. to provide services during before and/or after school programs operated by the District as they would if they provided services during the school day.

For before and after school programs operated by a community agency. This legislation is regarding collaboration between a school district and PIP/RBTs paid by the parent and does not reference before and after school programs. Therefore, it would be the decision of a community agency who is operating the before and after school programs to allow or not allow a PIP to provide services during their programs. The District or individual school would not be involved with this decision. The community agency would follow their contract with the District regarding having additional individual on campus during before and after school programs.

For more information, contact the After Care Program.

Section V
Declared State of Emergency

33. If there is a declared state of emergency / public health concern will schedules be adjusted?

(A) Yes, schedules will have to be adjusted to meet the required public health guidelines.