

The Role of the Designated School Official (DSO) in RTO

Illinois Administrative Code 23 IAC 1.285 sets clear standards for using restraint and time-out (RTO) in schools. These interventions are emergency measures permitted only when a student poses an imminent risk of serious physical harm to themselves or others and only after less restrictive strategies have been attempted or deemed ineffective. The Code assigns specific responsibilities to the Designated School Official (DSO), the primary individual overseeing these procedures, documentation, and compliance with all related requirements.

All incidents involving time-out, isolated time-out, or physical restraint must be reported to the DSO by the end of the school day on which the incident occurs. The DSO reviews and manages the documentation process, ensuring each incident is recorded and placed in the student's temporary record. The record must include the student's name, date of the incident, start and end times of the incident, a description of events leading up to the behavior, a summary of the behavior and specific imminent danger, less restrictive or instructive strategies tried before the intervention, a behavior log, and a detailed account of what occurred during the intervention. It must also include the type of intervention used, any injuries or property damage, and the names of the staff members involved. If the intervention involved an isolated time-out, the documentation must also state why a more restrictive setting was necessary and why adult presence in the room was impossible. The DSO is also responsible for reviewing this documentation for accuracy and confirming that it meets all reporting requirements, including submission to the Illinois Statewide Student Information System (SIS) using Form 11-01.

Following each intervention, schools must attempt to contact the parent or guardian on the same day the event occurred. The DSO documents this notification effort. Within one business day, the DSO must send a written report to the parent or guardian which includes a copy of the standards outlining when these interventions may be used, the rights of students and parents, information about the complaint process through the State Superintendent, and an explanation of procedures under Section 504 and special education law. No later than two school days after the incident, the principal or another administrator must notify the parent or guardian of their right to request a meeting to discuss the incident. If requested, this meeting must be scheduled within two school days unless the parent requests an extension. The DSO is responsible for documenting whether a meeting was held, including any outcomes or agreements. This summary is added to the student's record, and a copy is provided to the parent. If the parent does not request a meeting within ten school days or fails to attend a scheduled meeting, that fact is also recorded.

The DSO monitors compliance with state-mandated time limits. A restraint must stop immediately when imminent danger ceases or sooner if the student shows signs of distress or reports difficulty breathing. Staff are expected to pause every five minutes during a restraint to reassess the need for continued intervention. If the intervention continues beyond 15

minutes for restraint or 30 minutes for time-out, a licensed educator or clinical practitioner must evaluate the student and consider the appropriateness of continuing the procedure in use. The DSO confirms that this evaluation is completed and that the findings are documented for review.

If a student experiences two incidents of supine restraint or three incidents of physical restraint or time-out within thirty school days, the DSO initiates a [Restraint Review Meeting](#). This meeting must occur within twenty school days of the third incident unless the parent requests more time. At least one clinical or mental health professional, such as a psychologist, social worker, nurse, or behavior specialist, must attend. The purpose is to review incident data, assess current supports, and determine whether changes are needed to the student's IEP, 504 Plan, or Behavior Intervention Plan. The team also reviews any medical or psychological contraindications that might make RTO inappropriate for the student. The DSO coordinates parent notification for the meeting, which must be sent at least ten days in advance and include information about potential changes in services or placement.

The DSO also oversees staff training related to RTO. All staff participating in restraint or time-out must complete eight hours of annual training before using any of the restrictive interventions. Required topics include crisis de-escalation, trauma-informed and restorative practices, behavior management, recognizing signs of distress during RTO, proper documentation, relevant laws and ethical standards, and the physical or hands-on component of using RTO. Staff must demonstrate competence to a qualified professional in performing RTO procedures and using less restrictive options. The DSO maintains training records and tracks which staff have completed the required instruction and certification.

In addition to reviewing individual incidents, the DSO takes part in school- or district-level evaluations of RTO practices. This includes reviewing the frequency and context of interventions, identifying trends or concerns, tracking injuries, and assessing the quality and timeliness of parent communication. The DSO contributes to an annual review of restraint and time-out use to determine if procedural or training adjustments are needed across the building or district.

The Designated School Official plays a critical role in ensuring that restraint and time-outs are used safely and only when necessary. They help keep students safe, ensure staff follow the rules, and use good judgment based on what's best for students and what the law requires. It's a role that calls for staying aware, knowing the procedures inside and out, and assisting to prevent the overuse of these restrictive interventions.