

Dear Mr. George,

I am writing as a School Psychologist Intern working in Minnesota special education, specifically within a Federal Setting IV program, to offer my comment on the future of seclusion as a safety tool of last resort.

My primary professional goal is to ensure that our schools are places where students feel both emotionally and physically safe. I never feel successful when seclusion is implemented; however, the reality is that the "Hard Stop" Proposal without fully implemented, funded, and evidence-based alternatives poses a severe risk to both students and staff. Seclusion, used strictly as a last resort when all other de-escalation fails, currently serves as a vital tool to prevent serious injury to both students and staff. Notably, there are some students for whom seclusion is reported to feel safer to the student than the alternative of physical holding. When used in these emergency situations, students are continuously monitored, the spaces are clean and safe, and it is not used when a student is at risk of self-harm.

I urge the Working Group to choose the "Runway with Support" Proposal. This approach is the only responsible path forward as it allows schools to continue supporting students in the least restrictive way possible while the necessary infrastructure is established statewide.

Removing this safety net before effective, fully funded, and piloted alternatives are in place will lead to dangerous outcomes, including

- Increased physical restraint with risk of injury to students and staff.
- Law enforcement involvement, which can result in vulnerable students facing assault charges for behaviors that could otherwise be managed by school staff.
- Use of shortened school days or loss of placement stability for students with the highest level of need.

Successful alternatives, such as the implementation of Ukeru, reduce the use of seclusion for some students, yet Ukeru has not solved the safety issue for *all* students. We must have access to the full range of tools necessary to respond to complex situations safely until alternatives are proven effective across the spectrum of student needs.

Thank you for considering the realities faced by our dedicated teams and students.

Sincerely,

Isabella Kranz

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