

ISBE RTO Guidance: Key Changes and Clarifications

In November 2025, the Illinois State Board of Education (“ISBE”) released revised nonbinding Guidance and Frequently Asked Questions regarding the use of isolated time out, time out, and physical restraint (collectively referred to as “RTO”) in Illinois schools. This update builds on ISBE’s May 2022 guidance and addresses areas that have previously caused confusion for practitioners. ISBE elaborated that the purpose of the guidance is to support the broader goal of maintaining a safe learning environment in tandem with the use of positive behavior strategies. Below are the major clarifications and updates.

Momentary Period of Physical Restriction versus Physical Restraint

The 2025 guidance specifically defines a “momentary period of physical restriction” and provides examples and a reference chart to distinguish between a momentary period of physical restriction, which does not require reporting to ISBE, and a physical restraint.

Momentary Period of Physical Restriction and Non-Restraint Examples	Physical Restraint Examples
A brief comforting touch such as a pat on the back for a student in distress	Forcible removal of a student from the classroom
Placing a hand in a student’s shoulder to gain attention	
Lightly guiding a student away from a peer to prevent escalation	
Use of brief squeezes, joint compression, or proprioceptive exercises to assist with regulation	
Stepping between students or briefly guiding them apart during a fight	Grabbing and pulling a student away during a fight

When Blocking Egress/Eloperment or a Room Evacuation Constitutes RTO

The guidance also provides clarity on when preventing a student from leaving a classroom will constitute a time out or physical restraint.

Not Time Out or Restraint	Time Out	Physical Restraint
<ul style="list-style-type: none">If there are other students in the classroom, and a student’s egress is blocked to prevent elopementIf there are no other students in the classroom because it has been evacuated and the student voluntarily remains to de-escalate	If staff evacuate all other students from the classroom, and the student’s egress is blocked (student does not want to voluntarily remain in the classroom)	If staff do not cause the removal of the student from their peers, but staff use force to block the student’s egress

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Refined Definitions

In addition, ISBE offers additional guidance on the scope of various restraint definitions:

- **Physical restraint** includes an escort that restricts a student's movement, unless it involves a temporary touching, such as of the hand, wrist, arm, shoulder, or back for the purpose of inducing a student to walk to a safe location without restriction of movement.
- **Prone physical restraints** include a standing prone restraint and are prohibited.
- **Supine physical restraints** include a standing supine restraint and are prohibited unless certain conditions are met.
- While a **chemical restraint** does not include medication that is legally prescribed and administered, the administration of medication at a time not specified in the prescribed orders or pursuant to the school or district's policy on administering medication will be considered a chemical restraint and is prohibited.
- While a **mechanical restraint** does not include the use of blocking pads as a defensive measure to absorb blows without restricting a student's egress or freedom of movement, any forward movement with a locking pad toward a student in an attempt to control or contain their movement is considered a mechanical restraint and is prohibited.

Procedural Requirements

Finally, the guidance includes several procedural changes and clarifications, including the following:

- The guidance specifies the requirements for trainers who provide instruction to staff on RTO and notes that, if a trainer does not meet the outlined requirements, all staff trained by that individual are considered out of compliance with the required training standards.
- When a student has experienced three uses of RTO in a 30-day period, the required review meeting must be held no later than 20 days after the third instance.

ISBE's updated guidance provides meaningful clarification on many areas of RTO implementation, while underscoring the complexity of applying the statutory and regulatory language to often fast-moving and safety-driven situations. School districts, cooperatives, and private placements should review their RTO policies and procedures to ensure alignment with the new guidance and consult their Robbins Schwartz attorneys with any questions or to request model RTO procedures.