

Operational Services

Administrative Procedure - Targeted School Violence Prevention Program

Threat assessment procedures work best when incorporated into an overall Targeted School Violence Prevention Program (Program) strategically developed and collectively implemented by local school officials, District staff, student body members, and the community.¹ Under a properly implemented Program, schools can respond to student behavior that raises safety concerns. This administrative procedure contains four sections as follows:

1. Glossary of Terms
2. Targeted School Violence Plan
3. Preparedness for a Targeted School Violence Crisis, Response, and Recovery
4. Threat Assessment (Three Phases):
 - Phase One: Identification
 - Phase Two: Investigation
 - Phase Three: Response

Glossary of Terms

Threat - An expression of intent to harm someone that may be spoken, written, or communicated in some other way.

Targeted School Violence - Includes school shootings and other school-based attacks where the school was deliberately selected as the location for the attack and was not simply a random site of opportunity.

Targeted School Violence Prevention Program (Program) - The overall process used to create a District and school environment that is conducive to learning by identifying, managing, and preventing threats and acts of Targeted School Violence.

Targeted School Violence Prevention Plan (TSVP Plan) - The strategic procedures used to integrate a Targeted School Violence Prevention Program into a District's existing policies and procedures.

School Violence Prevention Team (SVP Team) - A District-level team that the Superintendent creates to develop a Targeted School Violence Prevention Plan and oversee the District's Targeted School Violence Prevention Program and anti-bullying program. The SVP team utilizes the expertise of its members to ensure that the District develops school violence prevention plans that comply with applicable civil rights and other federal and State laws.

Threat Assessment - A rational approach to prevent school violence through evaluating students that demonstrate potentially dangerous behavior. Developed by the U.S. Secret Service and adapted for use in school settings, it aims to first assess the seriousness of the threat and then the appropriate response to resolve it and ultimately prevent an act of Targeted School Violence.

Threat Assessment Team - A building-level team that performs a threat assessment when activated by the Building Principal.

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It may include the Building Principal, Assistant Building Principal, School Resource Officer, School Psychologist, and School Counselor or Social Worker.

Targeted School Violence Prevention Plan

Following are the strategic procedures to integrate a Targeted School Violence Prevention Program into the District’s existing policies and procedures.

Actor	Action
Superintendent	<p>Select a School Violence Prevention Team (SVP Team) from throughout the community to include:</p> <ul style="list-style-type: none"> Building Principals (Building Principals are mandatory for successful implementation of a TSVP Plan). District Safety Coordinator (see 4:170-AP1, <i>Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities</i>) ² Teachers Law enforcement representatives Board attorney ³ District psychologist(s) Mental health workers and/or social service agencies Faith leaders Community members Students <p>Chair and convene SVP Team meetings for the purpose of completing a District-level TSVP Plan.</p> <p>Determine whether to recommend that the Board assess the District’s conditions for development and learning (see 7:180-AP1, <i>Prevention, Identification, Investigation, and Response to Bullying</i>, for resources and more discussion).</p> <p>Inform School Board of the SVP Team’s progress and needs by adding information item to Board’s agendas as needed.</p>
SVP Team	<p>Develop processes to identify, assess, and manage threatening communications and situations.</p> <p>Identify policies and procedures that possibly affect a TSVP Plan, including but not limited to:</p> <ul style="list-style-type: none"> 1:20, <i>District Organization, Operations, and Cooperative Agreements</i> 2:150, <i>Committees</i> 2:240, <i>Board Policy Development</i> 3:40, <i>Superintendent</i> 3:60, <i>Administrative Responsibility of the Building Principal</i> 4:170, <i>Safety</i> 5:100, <i>Staff Development Program</i>

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Actor	Action
	<p>5:130, <i>Responsibilities Concerning Internal Information</i> 5:230, <i>Maintaining Student Discipline</i> 6:65, <i>Student Social and Emotional Development</i> 6:120, <i>Education of Children with Disabilities</i> 6:235, <i>Access to Electronic Networks</i> 7:20, <i>Harassment of Students Prohibited</i> 7:130, <i>Student Rights and Responsibilities</i> 7:140, <i>Search and Seizure</i> 7:150, <i>Agency and Police Interviews</i> 7:170, <i>Vandalism</i> 7:180, <i>Prevention of and Response to Bullying, Intimidation, and Harassment</i> 7:190, <i>Student Behavior</i> 7:200, <i>Suspension Procedures</i> 7:210, <i>Expulsion Procedures</i> 7:230, <i>Misconduct by Students with Disabilities</i> 7:250, <i>Student Support Services</i> 7:340, <i>Student Records 4</i> 8:10, <i>Connection with the Community</i> 8:95, <i>Parental Involvement</i> 8:100, <i>Relations with Other Organizations and Agencies</i></p> <p>Recommend, through the Superintendent, all policy changes to the School Board for consideration. See policy 2:240, <i>Board Policy Development</i>.</p> <p>Appoint Building Principals or designees as a “point of contact” to encourage and accept reports of threats.</p>
Building Principal	<p>Establishes and leads building-level Threat Assessment Teams consisting of available personnel such as the Assistant Principal, School Counselor/School Psychologist, and School Law Enforcement/Resource Officer. (The building-level team composition can be adapted to meet the staffing patterns for different schools and may include other disciplines.) 5</p> <p>Ensures 4:170-AP1, <i>Administrative Procedure - Comprehensive Safety and Security Plan, Part G, School Emergency Operations Plan (EOP)</i>, is available throughout schools (do not limit to office); distributes to and discusses with local law enforcement; regularly reviews plan with the building staff.</p> <p>Publicizes and educates staff, parents/guardians, students, and community members: (1) to report students and situations of concern to any school administrators or other authorities (i.e., local law enforcement), and (2) how school officials will address these concerns. This can be accomplished by distributing 4:170-AP7,</p>

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Actor	Action
	<p><i>Targeted School Violence Prevention Program</i> and 7:180-AP1, E2, <i>Be a Hero by Reporting Bullying</i>, and discussing what Threat Assessment Teams are and what they do when they learn of threats and/or school violence.⁶</p> <p>Assess the feasibility of forming an anonymous tip line and organizing its management.</p> <p>When a tip or concern is raised, proceed with Threat Assessment - Phase One: Identification of Threat procedures.</p> <p>Provide follow-up acknowledgements to those who provide information, e.g., “we appreciate your bringing this situation to our attention” or “we have carefully considered the information you shared with us.”</p>
School Board	<p>Monitor 4:170, <i>Safety</i>, and make changes recommended by the SVP Team. See policy 2:240, <i>Board Policy Development</i>.</p> <p>Provide both the SVP and Threat Assessment Teams with appropriate resources. This may include providing resources to and access for staff to professional development opportunities. These opportunities should train staff to properly respond to students who provide them with information about a threat or school safety concern. ⁷</p>
Superintendent/Building Principal	<p>Ensures the student disciplinary policies referred to in student handbooks notify students that threatening behavior could subject a student to disciplinary consequences. See 7:180, <i>Prevention of and Response to Bullying, Intimidation, and Harassment</i> and 7:190, <i>Student Behavior</i>.</p> <p>Ensures that staff responds to students who provide them with information about a threatening or disturbing situation.</p>

Preparedness for a Targeted School Violence Crisis, Response, and Recovery

This portion follows 4:170-AP1, *Comprehensive Safety and Security Plan* and suggests additional steps specific to preparing for a Targeted School Violence crisis that school officials may want to incorporate in the District’s existing Safety and Crisis Plan.

Actor	Action
Superintendent, Building Principal, and SVP Team	Examines 4:170-AP1, <i>Comprehensive Safety and Security Plan</i> procedures and recommend any changes to existing procedures to Superintendent or District Safety Coordinator.
District Safety Coordinator	<p>Meet with SVP Team to foster an understanding of what additional items the District’s Safety Team might add to its procedures to accomplish a response and recovery.</p> <p>Add an agenda item to the 4:170-AP1, <i>Comprehensive Safety and</i></p>

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Actor	Action
	<p><i>Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities.</i> Safety Team meetings specific to Targeted School Violence; consider inviting the Board Attorney and local law enforcement and emergency responders to this meeting.</p> <p>Note: During a crisis, legal counsel will be a crucial part of crisis response and management (but not necessarily public relations and communication) because school officials must make split-second decisions, often with legal consequences to the District; local law enforcement’s familiarity with the identity of the District’s legal counsel <i>before</i> a crisis occurs will assist with a faster connection between legal counsel and the school officials involved in the early stages of a Targeted School Violence Crisis and the immediate response to it.</p> <p>Consider designating a trained public relations and communication manager to inform parents and the community during a crisis and to keep pace with social media information.</p>
<p>Superintendent and Building Principal(s)</p>	<p>For crisis preparedness and response, ensure:</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Part G, School Emergency Operations Plan (EOP)</i> reflects each individual building’s needs.</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Part F, School Safety Drill Plan</i>, supports a TSVP Plan, specifically consider whether to add a law enforcement drill if the school does not already participate.</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Parts G and H</i>, reflects each building’s needs. It also ensures that multiple copies of these plans exist, and it directs that appropriate persons have access to the plans, e.g., local law enforcement authorities, etc. One copy in the Building Principal’s office is insufficient.</p> <p>For crisis recovery, ensures:</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Parts I, J, and K</i>, reflects District needs and that the Board Attorney is aware of the plans.</p> <p>Recommend to the District Safety Coordinator any other additional crisis recovery items that the safety team deems necessary.</p>

Threat Assessment 8

The procedures of this section rely heavily upon Building Principals to lead Threat Assessment Teams through the use of 4:170-AP7, E1, E2, and E3 to identify, assess, and manage threatening behavior.

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Phase One: Identification of Threat

Actor	Action
Anyone	Identifies student or situation to applicable Building Principal.
Building Principal (alone or with Threat Assessment Team)	<p>Assesses the question: “How much time do we have?” If time is critical, proceeds directly to the crisis management procedures outlined in 4:170-AP1, <i>Comprehensive Safety and Security Plan</i> (this procedure outlines when to involve law enforcement).</p> <p>Notifies the Superintendent.</p> <p>If 4:170-AP1, <i>Comprehensive Safety and Security Plan</i> is not immediately necessary, uses 4:170-AP7, E1, <i>Threat Assessment Decision Tree</i>, and follows steps to evaluate the threat (generally, a Building Principal can quickly resolve the first three steps without engaging the full Threat Assessment Team in a comprehensive threat assessment).</p> <p>Step 1: Evaluate threat.</p> <p>Using 4:170-AP7, E2, <i>Threat Assessment Documentation and Response</i>, thoroughly and promptly collects information and evaluates threat by:</p> <ol style="list-style-type: none"> 1. Interviewing student with a standard set of questions and documenting the facts; 2. Notifying the student’s parent(s)/guardian(s) (use 7:190-E1, <i>Aggressive Behavior Reporting Letter and Form</i>, when appropriate); 3. Notifying the parent(s)/guardian(s) of the target(s); and 4. Assessing the need for confidentiality of the information gathered from students and other witnesses during the threat assessment investigation and response phases. <p>Step 2: Decide whether threat is clearly transient or substantive.</p> <p>Considers the context of how the threat was made and categorizes the level of risk as transient or substantive. The most important distinction between transient and substantive threats is that substantive threats require protective action to prevent the threat from being carried out. Serious discipline violations do not always constitute substantive threats.</p> <p>Transient threats proceed to Step 3: Respond to transient threat.</p> <p>Substantive threats skip Step 3 and proceeding directly to Step 4: Assess whether the substantive threat is serious or very serious, below using Threat Assessment - Phase Two: Investigation.</p> <p>Step 3: Respond to transient threat.</p> <p>When the threat is transient, the full threat assessment team does not need to perform a comprehensive threat assessment; determines</p>

Actor	Action
	<p>appropriate management and discipline considerations and responds accordingly. When a transient threat is sparked by an argument or conflict, may involve other Threat Assessment Team members to determine the appropriate management and discipline considerations to resolve the problem.</p> <p>See policies 7:190, <i>Student Behavior</i>; 7:180, <i>Prevention of and Response to Bullying, Intimidation, and Harassment</i>; and/or 6:120, <i>Education of Children with Disabilities</i>.</p>

Phase Two: Investigation

Actor	Action
<p>Building Principal and Threat Assessment Team</p>	<p>Step 4: Assess substantive threat as serious or very serious.</p> <p>Keep Superintendent informed.</p> <p>Assess whether the threat is <i>serious</i> or <i>very serious</i> by examining the intended severity of the threatened injury/action. Consult with notes on 4:170-AP7, E2, <i>Threat Assessment Documentation and Response</i>.</p> <p><i>Serious threats</i> (generally threats to physically harm) proceed to Step 5.</p> <p><i>Very serious threats</i> (generally threats involving the use of a weapon, murder, sexual assault, or severe injury to others) skip Step 5, proceeding directly to Step 6 below in Threat Assessment - Phase Three: Response, Local Law Enforcement.</p> <p>Manage the student of concern; consider contacting the Board Attorney; and ensure discreteness of situation. See, 7:130, <i>Student Rights and Responsibilities</i>; 7:140, <i>Student Search and Seizure</i>; 7:180, <i>Prevention of and Response to Bullying Intimidation and Harassment</i>; 7:250 <i>Student Support Services</i>; and 7:250-AP2 <i>Protocol for Responding to Students with Social Emotional, or Mental Health Problems</i>.</p> <p>Step 5: Respond to serious substantive threat.</p> <p>Notify and protect all potential target(s) and notify their parent(s)/guardian(s). Use 4:170-AP7, E2, <i>Threat Assessment Documentation and Response</i>, to ensure that protective action reflects the circumstances of the threat.</p> <p>Caution the student about the consequences of carrying out the threat and keep student’s parent(s)/guardian(s) informed.</p> <p>Determine the appropriate management and discipline considerations to resolve the problem. See 6:120, <i>Education of Children with Disabilities</i>; 7:190, <i>Student Behavior</i>; 7:200, <i>Suspension Procedures</i>; and 7:210, <i>Expulsion Procedures</i>.</p>

Phase Three: Response

Actor	Action
<p>Building Principal and Threat Assessment Team in conjunction with Local Law Enforcement Investigators</p>	<p>Step 6: Respond to Very Serious Threat</p> <p>Determine whether to conduct safety evaluation, psychological assessment, or law enforcement investigation.</p> <p>Consider suspension to ensure immediate protection of all potential targets and notify their parent(s)/guardian(s).</p> <p>Use 4:170-AP7, E2, <i>Threat Assessment Documentation and Response</i>, to ensure that protective action reflects the circumstances of the threat.</p> <p>Refer student(s) for mental health evaluation; manage student(s); contact Board attorney; and ensure discreteness of situation. 7:200, <i>Suspension Procedures</i>; 7:250, <i>Student Support Services</i>; and 7:250-AP2, <i>Protocol for Responding to Students with Social, Emotional, or Mental Health Problems</i>.</p> <p>Refer matter to the school resource officer and/or local law enforcement to investigate and engage other resources within the community.</p>
<p>School Resource Officer and/or Local Law Enforcement</p>	<p>Issue findings and recommendations of investigation to Threat Assessment Team.</p>
<p>Building Threat Assessment Team</p>	<p>Determine appropriate management and discipline; recommend suspension or expulsion based upon the findings and recommendations of local law enforcement. See 7:200, <i>Suspension Procedures</i>; 7:210, <i>Expulsion Procedures</i>; 7:250, <i>Student Support Services</i>; and 7:250-AP2, <i>Protocol for Responding to Students with Social, Emotional, or Mental Health Problems</i>.</p> <p>Step 7: Implement a written safety plan.</p> <p>If student returns to school, integrate findings and recommendations of investigation to create a written safety plan that responds to the incident through management and protection of potential target(s) while addressing students’ educational needs. The plan should, among other things:</p> <ul style="list-style-type: none"> • Describe conditions the student must meet to return and stay in school; • Implement procedures to monitor the student if he or she returns to the school; • Include feedback from the student(s)’ parent(s)/guardian(s) (when appropriate); and • Include other items as deemed appropriate by the Threat Assessment Team. <p>See 6:120, <i>Education of Children with Disabilities</i>; 7:250, <i>Student Support Services</i>; and 7:250-AP2, <i>Protocol for Responding to Students with Social, Emotional or Mental Health Problems</i>.</p>