

Broward County Public Schools, Florida Compliance Audit – School Year 2021-2022 Threat Assessment Policy & Procedures

August 22, 2022



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### TRANSMITTAL LETTER

August 22, 2022

Mr. Joris Jabouin, CPA Chief Auditor Broward County Public Schools 600 SE 3rd Avenue, 10th Floor Fort Lauderdale, FL 33301



Pursuant to the approved Statement of Work dated May 12, 2022, between Broward County Public Schools ("BCPS" or "District") and RSM US LLP ("RSM" "us," "we" or "our"), we hereby submit our compliance audit report on Threat Assessment Policy & Procedures for School Year 2021-22. Our compliance audit focused on the required documentation as per the Behavioral Threat Assessment Procedures Manual 2022 Revision (March 9, 2022) and the Threat Assessment Policy 4380 and 2130 related to assessing threats that are formally identified by BCPS in their system, EdPlan. The objectives of our testing were to determine if the required forms were 1) entered or uploaded into the software, 2) substantially complete, and 3) completed/signed by the appropriate member of BCPS, if applicable. Please note, RSM did not test for appropriateness of the content of the files or the District's threat assessment process.

#### Scope, Methodology and Results

We held a kickoff meeting with representatives from the Office of the Chief Auditor ("Internal Audit") on June 13, 2022, to gain an understanding of the threat assessment process, with an emphasis on the updates to the process since our prior audits. We held virtual walkthroughs with management to observe a live demonstration of the automated process and system. From these meetings, we created a list of items needed for our testing and worked with the District team and Internal Audit to obtain the necessary information.

Internal Audit provided us with a population of 1,670 threat assessments out of EdPlan from the period of March 8, 2022 through June 8, 2022. Internal Audit requested that we remove Charter Schools, unfounded threats, transient threats, and duplicate system entries from the population we received. Thus, the updated population of 232 is inclusive of all very serious substantive and serious substantive level threats. Per Internal Audit's direction, we judgmentally selected a sample of 35 threat assessments, thus our sample and related testing results were not designed to be representative of the population. Our full sample selection methodology is outlined on page 8.

Below is a high-level overview of the samples selected by type of school and associated threat assessment risk ranking, as classified by the District.

| Samples Selected and Tested by School Type and Threat Level |                             |                     |        |  |  |  |  |
|---|-----------------------------|---------------------|--------|--|--|--|--|
| School Type   | Very Serious<br>Substantive | Serious Substantive | Totals |  |  |  |  |
| High School   | 5                           | 4                   | 9      |  |  |  |  |
| Middle School   | 5                           | 4                   | 9      |  |  |  |  |
| Elementary School   | 5                           | 3                   | 8      |  |  |  |  |
| Centers   | 5                           | 4                   | 9      |  |  |  |  |
| Totals  | 20                          | 15                  | 35     |  |  |  |  |

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### TRANSMITTAL LETTER - CONTINUED

### Scope, Methodology and Results - Continued

There are 47 attributes that were tested within the 35 threats sampled. The 47 attributes tested were provided by Internal Audit and focused on the student intake form, incident information, data collection, interviews, analysis, student support plans and monitoring. A full listing of the attributes tested can be found in the "Attributes Tested" section of this report.

The table below illustrates a high-level analysis of the results of our testing for SY 2021-2022 by risk level and school type.

| By Risk<br>Level     | • | Serious Substantive: Exceptions were noted for ten (10), or 67%, of the fifteen (15) serious substantive threats tested. The remaining five (5) serious substantive risk threats, or 33% tested had no exceptions.  Very Serious Substantive: Exceptions were noted for sixteen (16), or 80%, of the twenty (20) very serious substantive risk threats tested. The remaining four (4) very serious substantive risk threats, or 20% tested had no exceptions.   |
|----------------------|---|---|
| By Type<br>of School | • | Centers: Exceptions were noted for nine (9), or 100%, of the nine (9) threats tested.  Elementary Schools: Exceptions were noted for six (6), or 75%, of the eight (8) threats tested. Two (2) Elementary Schools, or 25% tested had no exceptions.  Middle Schools: Exceptions were noted for seven (7), or 78%, of the nine (9) threats tested. Two (2) Middle Schools, or 22% tested had no exceptions.  High Schools: Exceptions were noted for four (4), or 44%, of the nine (9) threats tested. Five (5) High Schools, or 56% tested had no exceptions. |

A full listing of comparative results is included in the "SY 2020 through SY 2022 Comparisons" section of this report.

### **Process Improvement Recommendation**

Signatures and dates of signatures are required components in many BTA processes. Currently, obtaining signatures and dates is a manual process that requires a printed signature page and a live signature from several key team members. We support BCPS's district-wide initiative to implement electronic digital signature and dating capabilities. This will assist with mitigating risks associated with manual signature and date processes. An automated trigger could also be incorporated to alert team members when the assessment is ready for their signature.

We would like to thank all those who assisted us in this compliance audit of Threat Assessment Policy and Procedures.

Respectfully,

RSM US LLP

RSM US LLP



### **BACKGROUND**

Broward County Public Schools has a formal set of procedures for threat assessment. The Threat Assessment Procedures Manual was initially instituted in 2002, with updates to the manual in subsequent years. BCPS has made significant changes to the process by implementing an automated system, EdPlan, used to identify and track threat assessments. BCPS updated the Behavioral Threat Assessment (BTA) procedures manual, effective March 8, 2022. Additionally, BTA Policy 4380 superseded BTA Policy 2130, effective May 17, 2022. The procedures manual and policy were both implemented during the 2021-2022 school year. A Behavioral Threat Assessment Department was established on July 1, 2022 to verify all threat assessments going forward are in compliance with the updated procedure manual and policy.

Since the implementation of EdPlan, there have been several internal trainings and updates to the system, beginning in October 2019. Further updates followed during each following school year. Further updates occurred during the school year 2022: August 2021, December 2021, Winter/Spring 2022. After the school year ended, but before the report was issued, a July 2022 update also occurred. These systematic updates improved processes and corrected known system glitches. The system updates for school year 2022 and for July 2022 are summarized in the table below.

| August 2021   | December 2021  | Winter/Spring 2022   | July 2022  |
|---|--|--|--|
| Document update to include the school year in which the document was created within | New feature to allow for electronic<br>signing of BTA documents and<br>Monitoring/Safety Plans | <ul> <li>District approved the Navigate 360 contract for the provision of future trainings. This will also offer a more flexible training platform for school-based teams and more immediate training offerings</li> <li>Proposed revisions to the BTA Policy were presented to the School Board on February 22, 2022. The proposed revisions are to add language that clarifies District procedures and includes language for new state requirements. As a result, BTA Policy 2130 was superseded by BTA Policy 4380 on May 17, 2022</li> <li>Updated the BTA Procedures Manual, revised March 8, 2022</li> </ul> | The Behavioral Threat Assessment<br>Department was established under<br>the Safety, Security, & Emergency<br>Preparedness Division |

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### BACKGROUND - CONTINUED

EdPlan serves as the BCPS database for BTA records. When a threat report is received, BTA teams must follow procedures and complete all components in the EdPlan system. Below is an outline of the Behavioral Threat Assesment Process:

# Behavioral Threat Assessment (BTA) Process Map

BTA teams must respond, within 24 hours when school is in session, to any report of a threat or any patterns of behavior that may pose a threat to self or others. In the absence of extenuating circumstances (e.g., student arrest, Baker Act, refusal to participate, parent unavailable until a later time, etc.), the entire BTA must be completed within 72 hours. The countdown starts as soon as the Administrator is aware of the incident.

After a threat is reported to Administrator:

 Administrator fills out the Student Risk Intake Form. This includes details of incident (name. time, place, what occurred, etc.)

- Initial Student Interview must be performed by a school-based Administrator
- Teacher Input Form must be completed
- Witness Interview required if witnesses were identified
- Clinical Parent & Student interviews must be performed by a professional (counselor, specialist, psychologist, etc.) for serious and very serious substantive level threats
- Review behavioral/discipline history
- Review ESE, 504, and/or gifted history
- Review academic/attendance history

- The team identifies any actions that require continued implementation and monitoring
- Finalize the Monitoring plan within 72 hours of completing BTA Parts 1-3
- All participants must sign the signature page

Threat Occurred & Reported

BTA Part 1-Incident Information

before the incident occurred

The BTA team must be

The BTA Part 1 must be filled out. This includes the same information at the Student Risk Intake

Form, with additional details of what happened

(Administrators, Teachers, Counselors, Mental Health Specialists, Law Enforcement, etc.)

BTA Part 2-Data Collection

assigned

BTA Part 3 -Analysis, Risk Level, and Student Support Plan

Monitoring Plan (Serious & **Very Serious** Substantive threats)

- Answer the 10 key questions listed in the BTA Form and Policies & Procedures
- Determine Risk Level (unfounded, transient, serious substantive, very serious substantive).
- Parent notification
- Mandatory Action Steps
- All team members must sign the signatures page

Follow Up, if applicable

BTA team reconvene every 30 school the days from initial Monitoring Plan for review and Modification

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### **OBJECTIVES AND APPROACH**

### **Objectives**

Our procedures were performed in accordance with the scope and approach set forth in our executed scope of work, dated May 12, 2022 and were limited to those described therein. The scope period was March 8, 2022 through June 8, 2022. Fieldwork was performed from June 2022 through August 2022. Several meetings were held with BCPS personnel during this time to conduct system walkthroughs, discuss system updates, and to vet the results of the report.

The specific objectives of this project were:

- Obtain an understanding of the threat assessment process.
- Obtain an understanding of the EdPlan system used to manage threat documentation and retention procedures.
- Review written policy, procedures, and established practices, and documentation thereof.
- Test a sample of 35 threats for compliance with the threat assessment policies and procedures.
- Report, both verbally and in writing, a condensed report featuring a comparison matrix that highlights the results as compared to the prior reporting periods.

### **Approach**

Our audit approach consisted of the following three (3) phases:

### Understanding and Documentation of the Process

During this phase, we performed the following:

- Conducted interviews and virtual walkthroughs with management to obtain an understanding of the threat assessment process, documentation and reporting, including updates and changes to the process related to recent automation;
- Reviewed the Behavioral Threat Assessment (BTA) Policy and Procedures Manual;
- Conducted EdPlan training; and
- Reviewed training aids.

### Testing for Compliance with Policy and Procedures

Tested compliance with the BTA Policy and Procedures. We selected 35 threats during the scope period (March 8, 2022 to June 8, 2022). The objectives of our testing were to determine if the required forms were: 1) entered or uploaded into EdPlan, 2) substantially complete, and 3) completed/signed by the appropriate member of BCPS, if applicable. *Please note, RSM did not test for appropriateness of the content of the files or the District's threat assessment process.* We tested for existence and completeness, among other attributes, for the following:

- Student Risk Intake Form
- Behavior Threat Assessment
- Initial Student Interview
- Witness Interview, if applicable
- Teacher Input Form
- Clinical Parent and Student Interview
- Monitoring Plan

#### Reporting

Since the conclusion of our procedures, our summarized findings and observations have been incorporated into this written report via the comparison matrix. We have reviewed the results with Management, and have incorporated Management's response into this report.



## SAMPLING METHODOLOGY

The Threat Assessment population was provided by the District and generated from EdPlan, therefore, RSM did not test the completeness of the population. A total of 232 threats were reported by school-based administrators during our scope period of March 8, 2022 to June 8, 2022, excluding charter schools, transient threats, unfounded threats, and duplicate system entries.

The table below summarizes the population of total recorded threats by threat level and school type, excluding charter schools, transient threats, unfounded threats, and duplicates.

| Total Population by School Type and Threat Level    |    |     |     |  |  |  |  |
|---|----|-----|-----|--|--|--|--|
| School Type Very Serious Serious Substantive Totals |    |     |     |  |  |  |  |
| High School   | 17 | 53  | 70  |  |  |  |  |
| Middle School                                       | 15 | 41  | 56  |  |  |  |  |
| Elementary School                                   | 10 | 42  | 52  |  |  |  |  |
| Centers   | 29 | 25  | 54  |  |  |  |  |
| Totals  | 71 | 161 | 232 |  |  |  |  |

As directed by Internal Audit, our sample was not intended to be representative of the population; rather, our sample was selected with a specific focus on the higher risk threats. The agreed upon sample size for testing was 35. Internal Audit requested that we include all very serious substantive and serious substantive threats in our sample. There were 71 very serious substantive threats and 161 serious substantive threats in the population, of which a total of 35 samples were selected.

To comply with requests from the School Board Members, Internal Audit has directed RSM to perform more frequent BTA compliance audits. Accordingly Internal Audit has modified the testing strategy by dividing the usual annual sample into two separate BTA compliance audits. Thus, the typical sample of approximately 70 threats are now be tested in two audits that each sample approximately 35 threats.

The table below summarizes the total number of records selected for testing by threat level and school type.

| Samples Selected and Tested by School Type and Threat Level |                             |                     |        |  |  |  |  |
|---|-----------------------------|---------------------|--------|--|--|--|--|
| School Type   | Very Serious<br>Substantive | Serious Substantive | Totals |  |  |  |  |
| High School   | 5                           | 4                   | 9      |  |  |  |  |
| Middle School   | 5                           | 4                   | 9      |  |  |  |  |
| Elementary School   | 5                           | 3                   | 8      |  |  |  |  |
| Centers   | 5                           | 4                   | 9      |  |  |  |  |
| Totals  | 20                          | 15                  | 35     |  |  |  |  |



## **ATTRIBUTES TESTED**

BCPS provided the following 47 attributes for testing with references to the Threat Assessment Policy and BTA Procedures manual, as applicable:

|  |    | Attributes   | Policy 2130*                   | Policy 4380**               | Manual Page Num*    |
|--|----|--|--------------------------------|-----------------------------|---------------------|
| School BTA Roles   | 1  | Did the school principal identify members of a BTA team that includes persons with expertise in counseling, instruction, school administration, and law enforcement?   | s III(B)                       | s III(B)                    | 7, 30               |
| SCHOOL BTA Roles   | 2  | Did the school principal assign school-based staff members to monitor and respond to all incoming reports where safety is of concern?  | s III(E)                       | s III(G)                    | 7                   |
|  | 3  | Did all school-based administrators and BTA team members attend and complete mandatory district threat assessment trainings? (Threat Assessment Procedures)  | s III(C)                       | s III(C)                    | 7                   |
| BTA Training   | 4  | Did all mandatory team members report their completion of mandatory training to their supervisor?  | s III(C)                       | s III(C)                    | 7                   |
| DIA Halling  | 5  | Did the BTA team provide annual training and guidance to students, staff, and parents on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting? | s III(D)                       | s III(D)(E)                 | 7                   |
|  | 6  | Was the Student Risk Intake Form present in EdPlan?  | s IV(A)                        | s IV(A); s V(F)             | 17, 44              |
| The contract of the contract o | 7  | Was the Student Risk Intake Form substantially completed?  | s IV(A)                        | s IV(A)                     | 17, 44-45           |
| Student Intake Form  | 8  | Was the Student Risk Intake Form listed as a finalized document on the EdPlan Documents tab?   | s IV(A)                        | s IV(A); s V(F)             | 17                  |
|  | 9  | Was the Student Risk Intake Form completed by the school-based administrator?  | s IV(A)                        | s IV(A)                     | 17, 44              |
|  | 10 | Were the mandatory immediate actions taken and documented if an imminent threat has been identified?   | s IV(A)(D)(c); s V(A)(C)(F)(G) | s IV(D)(c); s V(A)(C)(G)(H) | 17-18               |
| Initial Phase/Triage Process   | 11 | Was the Initial Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?   | s IV(A)                        | s IV(A); s V(F)             | 19, 51              |
|  | 12 | Was the Initial Student Interview Form substantially complete?   | s IV(A)                        | s IV(A)                     | 19, 51-52           |
|  | 13 | Was the Initial Student Interview completed by the school-based administrator?   | s IV(A)                        | s IV(A)                     | 19, 51              |
|  | 14 | Was the Teacher Input Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?  | s IV(A)                        | s IV(A); s V(F)             | 19, 53              |
|  | 15 | Was the Teacher Input Form substantially complete?   | s IV(A)                        | s IV(A)                     | 19, 53-55           |
| Vitness Interview(s) (required   | 16 | Was the Witness Interview Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?  | s IV(A)                        | s IV(A); s V(F)             | 19, 22, 31, 49      |
| only if any witnesses were   | 17 | Was the Witness Interview Form substantially complete?   | s IV(A)                        | s IV(A)                     | 19, 49-50           |
| identified)  | 18 | Was the Witness Interview completed by the school-based administrator?   | s IV(A)                        | s IV(A)                     | 19                  |
|  | 19 | Was the Behavioral Threat Assessment created in EdPlan?  | s IV(A)                        | s IV(A); s V(F)             | 21, 22, 30, 31      |
| 3TA Part 1: Incident Information   | 20 | Was the BTA Part 1 substantially complete?   | s IV(A)(D)(c)                  | s IV(A)                     | 21-22, 30-31, 46-48 |
| TATULE I IIICIGCIII IIIICIIII IIII   | 21 | Was the BTA initiated within 24 hours (when school was in session or no later than the end of the first day school was back in session); if no, was a reason for delay documented in EdPlan?   | s III(G)                       | s III(I)                    | 7, 21-22, 30-31     |
|  | 22 | Was the BTA Part 2 substantially complete?   | s IV(A)(D)(c)                  | s IV(A); s V(F)             | 22-23, 31-33, 56-57 |
| BTA Part 2: Data Collection  | 23 | If the student previously exhibited behaviors of concern or posed a threat, was the description (narrative) of prior incidents substantially complete?   | s IV(A)(D)(c)                  | s IV(A)                     | 56                  |
| 2  | 24 | Was the Clinical Parent Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?   | s IV(A)(c)                     | s IV(A); s V(F)             | 32, 63              |
|  | 25 | Was the Clinical Parent Interview substantially complete?  | s IV(A)(c)                     | s IV(A)                     | 63-70               |
| linical Interviews (required for   | 26 | Was the Clinical Parent Interview completed by mental health professional?   | s IV(A)(c)                     | s IV(A)                     | 32, 63              |
| Substantive Threats only)  | 27 | Was the Clinical Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?  | s IV(A)(c)                     | s IV(A); s V(F)             | 32, 71              |
|  | 28 | Was the Clinical Student Interview substantially complete?   | s IV(A)(c)                     | s IV(A)                     | 71-81               |
| 111111111111111111111111111111111111111  | 29 | Was the Clinical Student Interview completed by a mental health professional?  | s IV(A)(c)                     | s IV(A)                     | 32, 71              |

SBBC Policy 2130, Behavioral Threat Assessment (BTA) as adopted 3/5/2019, amended 10/20/2020
 SBBC Policy 4380 (formerly 2130), Behavioral Threat Assessment (BTA) as adopted 3/5/2019, amended 10/20/2020 and 5/17/2022

<sup>\*\*\*</sup> BTA Procedures Manual 2022 Revision (3/8/2022)



## ATTRIBUTES TESTED - CONTINUED

|   | 11.56 | Attributes  | Policy 2130*             | Policy 4380**                   | Manual Page Num**   |
|---|-------|---|--------------------------|---------------------------------|---------------------|
|   | 30    | Was the BTA Part 3 substantially complete?  | s IV(A)(D)(c); s V(A)(F) | s IV(A); s V(F)                 | 23-28, 33-38, 58-62 |
|   | 31    | Was the parent/guardian contacted?  | s IV(A)(C)               | s IV(C)                         | 26, 36              |
|   | 32    | Was the parent/guardian contact documentation (narrative) substantially completed?  | s IV(A)                  | s IV(C)                         | 26, 36              |
| DTA Dark 2: Analysis Dick Loyel                                   | 33    | Was the BTA finalized in EdPlan?  | s IV(A)                  | s V(F)                          | 28, 38              |
| BTA Park 3: Analysis, Risk Level,<br>and Student Support Plan     | 34    | Was the Signatures page of the BTA uploaded to the BTA in EdPlan?   | s IV(A)                  | s V(F)                          | 29, 39              |
| and student support run   | 35    | Was the BTA signed by all team members as required?   | s IV(A)                  | s V(F)                          | 29, 39              |
|   | 36    | Did the Principal acknowledge BTA in EdPlan? (within approx. 48 hours)  | s IV(A)(B); s V(B)       | s IV(B); s V(B)                 | 28, 38              |
| 1   | 37    | Did the Cadre Director acknowledge BTA in EdPlan?   | s IV(A)                  | s V(B)                          | 29, 38              |
| 3   | 38    | Was the completed BTA documented in TERMS?  | s IV(A)                  | s V(F)                          | 29, 38              |
|   | 39    | Was the Monitoring Plan created?  | s IV(A)(c)(E)(a); s V(A) | s III(I); s IV(E)(a); s V(A)(F) | 39, 82-83           |
|   | 40    | Was the Monitoring Plan finalized in EdPlan?  | s IV(A)(c)               | s V(F)                          | 39, 82              |
| Monitoring Plan (required for                                     | 41    | Was the Monitoring Plan finalized within 72 hours of completing BTA parts 1-3?  | s IV(A)(c)               |                                 | 39, 82              |
| Serious/Very Serious  | 42    | Was the Signatures page of the Monitoring Plan uploaded to the BTA in EdPlan?   | s IV(A)(c)               | s IV(A); s V(F)                 | 39                  |
| Substantive Threats)  | 43    | Was the Monitoring Plan signed by all monitoring plan meeting participants?   | s IV(A)(c)               | s IV(A)                         | 39                  |
|   | 44    | Was the Monitoring Plan reviewed/modified by all team members every 30 school days (or earlier if warranted)  | s IV(A)(c)(E)(b)         | s IV(E)                         | 40, 83              |
| ٠   | 45    | Was the Monitoring Plan documentation maintained for all actions selected on the monitoring plan, when applicable.  | s IV(A)(c)(E)(b)         | s V(F)                          | 40                  |
| Transferred Students:<br>Continuation of Intervention<br>Services | 46    | Did the administrator at the receiving school of a transfer student, within the district, review the BTA file in EdPlan within 72 hours?  | s V(E)(a)                | s V(F)(a)                       | Per Board Members   |
|   | 47    | If notification of the student's transfer to an out-of-district school was received, did the BTA team confirm that intervention services remain available, as applicable, until the BTA team of the receiving school independently determines the need for intervention services? | s V(E)(b)                | s V(F)(b)                       | Request             |

<sup>\*</sup> SBBC Policy 2130, Behavioral Threat Assessment (BTA) as adopted 3/5/2019, amended 10/20/2020

<sup>\*\*</sup> SBBC Policy 4380 (formerly 2130), Behavioral Threat Assessment (BTA) as adopted 3/5/2019, amended 10/20/2020 and 5/17/2022

<sup>\*\*\*</sup> BTA Procedures Manual 2022 Revision (3/8/2022)

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## **POLICY REFERENCES**

The table below shows the policy section references for the most recent BTA Policy 4380. Sections 3A, 3F, 4E, 5A, 5C, 5D, 5E, 5F, 5G, 5H were not auditable because those sections were goals, statements, and objectives that are general in nature and are not subject to audit procedures.

| Section | Brief Description *   | Audited?      |
|---------|---|---------------|
| 3A      | The District School Safety Specialist shall ensure compliance with the policy.  | Not Auditable |
| 3B      | Each school principal shall identify members of a threat assessment team.   | Yes           |
| 3C      | All school-based administrations and threat assessment members must attend and complete mandatory district threat assessment trainings annually. Each team member's completion certificate must be uploaded to the designated electronic system. Those members appointed during the 2021-22 school year must complete training within ninety (90) days of appointment   | Yes           |
| 3D      | All school-based administrators and BTA team members must complete an annual refresher training. The team must provide annual training and guidance to students, staff, and parents on recognizing behaviors and various options of reporting.  | Yes           |
| 3E      | School staff will inform the school community annually on recognizing concerning behaviors and the various options for reporting.   | Yes           |
| 3F      | Parents of public-school students have a right to timely notification of threats, unlawful acts, and significant emergencies.   | Not Auditable |
| 3G      | Each school principal must assign school-based staff members who can proactively monitor and respond to incoming reports.   | Yes           |
| 3H      | All School Board of Broward County (SBBC) employees, volunteers, and contractors are required to report to school administration any expressed threat(s) or behavior(s) that may represent a threat to the community, school, or self.  | Yes           |
| 31      | The team must respond to any threat within 24 hours when school is in session or refer the threat to law enforcement if school is not in session. After, the threat assessment team must meet no later than the end of day the first day school is back in session to conclude if the threat is closed. It is strongly recommended that all BTAs are finalized within 72 hours when school is in session. If the BTA is not finalized within 72 hours documentation should be entered into electronic management system explaining the extenuating circumstances. | Yes           |
| 3J      | Each school-based threat assessment team must meet as often as needed to fulfill its duties of assessing and intervening with persons whose behavior may pose a threat to school staff or students, but no less than monthly. Threat assessment teams shall maintain documentation of their meetings, including dates and times, team members in attendance, cases discussed, and actions taken.  | Yes           |
| 4A      | The team must identify whether the threat has been made and whether it is a threat to self or a threat to others. The team must coordinate how to monitor the threat. The team shall follow guidelines for evaluation and treatment.  | Yes           |
| 4B      | Upon a determination by the BTA team members that a student poses a threat, all threat determinations must be reported to the school principal or his/her administrative designee.  | Yes           |
| 4C      | Upon a determination by the BTA team members that a student poses a threat, the principal or his/her designee, who is participating in the BTA, shall immediately attempt to notify the student's parent or legal guardian.   | Yes           |
| 4D      | Upon a determination by the BTA team members that a student poses a threat, authorized members of the BTA team may request and obtain criminal history record information, in addition to consulting with law enforcement.  | Yes           |



## POLICY REFERENCES - CONTINUED

| Section | Brief Description *  | Audited?      |
|---------|--|---------------|
| 4E      | The BTA team must coordinate resources to provide intervention to individuals whose behavior may pose a threat. The BTA team must plan for the implementation and monitoring of appropriate interventions.   | Not Auditable |
| 5A      | BTA teams shall follow established procedures for school-based community, and/or health care providers for mental health services.   | Not Auditable |
| 5B      | The school principal will review the documentation for all threat assessments to ensure completeness and fidelity. The school principal will sign/acknowledge that the BTA documentation is complete and will forward the signed/acknowledged assessment to their supervisor.  | Yes           |
| 5C      | If an immediate mental health or substance abuse crisis is suspected, school personnel must follow policies to engage behavioral health crisis resources who have been trained in crisis intervention.   | Not Auditable |
| 5D      | BTA teams shall contact other agencies involved with the student and any known service providers to share information and coordinate necessarily follow up.  | Not Auditable |
| 5E      | The BTA team shall identify additional members of the school community to whom threating behavior should be reported and provide guidance.   | Not Auditable |
| 5F      | BTA records are considered education records and shall be maintained and released in accordance with FERPA and state statute.  | Not Auditable |
| 5G      | If a student may be expelled or suspended, the school shall identify ways in which these can be safely enacted and identify resources to assist.   | Not Auditable |
| 5H      | Nothing in this policy shall preclude school personnel from acting immediately to address an imminent threat and to report to the school principal, or his/her designee, that an individual poses a threat of violence or physical harm to self or others. Where an immediate threat to life or safety exists, reports must result in immediate notification to law enforcement. | Not Auditable |
| 51      | The Chief Auditor will conduct annual audits in compliance with the policy and report findings to the Audit Committee and The School Board.  | Yes           |

<sup>\*</sup> SBBC Policy 4380, Behavioral Threat Assessment (BTA) as adopted 3/5/2019, amended 10/20/2020 and 5/17/2022.



## SY 2020 THROUGH SY 2022 COMPARISONS

The chart below shows the attributes that were tested in the prior year audits (SY 2019-2020 and SY 2020-2021), the current year audit (SY 2021-2022), and their results. The columns labeled SY 20, SY 21, and SY 22 are the number of exceptions that were found for each attribute. Please note the items designated with "N/A" below, were either not tested in the prior audits or they were not comparable to the current year. The attribute numbers listed below relates to SY 2021-2022 audit. Please refer to the prior years' reports for the prior year attribute numbers, as they have changed.

Please note that the current year audit focuses on serious substantive and very serious substantive risk threats only. These threats are high risk and contain more required components tested under audit as compared to the other threat types which were included and tested in previous years as evidenced below.

|                     |    |   | Sam<br>Very Ser<br>Serious:<br>Transien<br>Unfound | 122<br>nt: 19     | Sam<br>Very Ser<br>Serious:<br>Transien<br>Unfound | 39<br>: 24        | Sam<br>Very Se<br>Serious:<br>Transien<br>Unfound | 15<br>t: 0        |  |   |
|---------------------|----|---|--|-------------------|--|-------------------|---|-------------------|--|---|
|                     |    | Attributes  | SY 20  | % Failed<br>SY 20 | SY 21  | % Failed<br>SY 21 | SY 22   | % Failed<br>SY 22 | SY 22 Comments   |   |
| School BTA Roles    | 1  | Did the school principal identify members of a BTA team that includes persons with expertise in counseling, instruction, school administration, and law enforcement?  | 2.   |                   | 5  | 10%               | 2   | 7%                | Out of 30 schools  |   |
| SCHOOL BTA Roles    | 2  | Did the school principal assign school-based staff members to monitor and respond to all incoming reports where safety is of concern?   |  |                   | 1  | 2%                | 0   | 0%                | Out of 30 schools  |   |
|                     | 3  | Did all school-based administrators and BTA team members attend and complete mandatory district threat assessment trainings? (Threat Assessment Procedures)   | N/A  |                   | 101  | 28%               | 38  | 18%               | Out of the 212 employees listed as<br>BTA/SBA members who should<br>have completed the training. The 38<br>members who did not attend<br>training are: 9 SBAs, 24 Teachers,<br>and 5 MHPs. |   |
| BTA Training        | 4  | Did all mandatory team members report their completion of mandatory training to their supervisor?   |  |                   | N/A  | 101               | 28%   | 64                | 37%  | Out of the 174 employees listed as<br>BTA/SBA members who did<br>complete training but did not<br>uploaded their training certificate to<br>EdPlan. |
|                     | 5a | Did the BTA team provide annual training and guidance to staff on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting?                       |  |                   |  | 0                 | 0%  | 0                 | 0%   | Out of 30 schools   |
|                     | 5b | Did the BTA team provide annual training and guidance to <b>students and parents</b> on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting? |  |                   |  |                   | 0   | 0%                | 5  | 14%   |
|                     | 6  | Was the Student Risk Intake Form present in EdPlan?   | 21   | 11%               | 0  | 0%                | 0   | 0%                |  |   |
|                     | 7  | Was the Student Risk Intake Form substantially completed?   | 0  | 0%                | 0  | 0%                | 0   | 0%                | Out of 35 threat assessments   |   |
| Student Intake Form | 8  | Was the Student Risk Intake Form listed as a finalized document on the EdPlan Documents tab?  | 29   | 16%               | 0  | 0%                | 0   | 0%                | The 2 Student Risk Intake Forms<br>were completed by the MHP instead   |   |
|                     | 9  | Was the Student Risk Intake Form completed by the school-based administrator?   | 0  | 0%                | 2  | 3%                | 2   | 6%                | of an SBA as they started out as a   |   |
|                     | 10 | Were the mandatory immediate actions taken and documented if an imminent threat has been identified?  | 0  | 0%                | 0  | 0%                | 0   | 0%                | Threat to Self.  |   |



## SY 2020 THROUGH SY 2022 COMPARISONS - CONTINUED

|  |    |  | Sam<br>Very Se<br>Serious:<br>Transien<br>Unfound | 122<br>t: 19      | Sam<br>Very Ser<br>Serious:<br>Transien<br>Unfound | 39<br>t: 24       | Sam<br>Very Ser<br>Serious:<br>Transien<br>Unfound | 15<br>t: 0  |  |
|--|----|--|---|-------------------|--|-------------------|--|---|--|
|  |    | Attributes   | SY 20   | % Failed<br>SY 20 | SY 21  | % Failed<br>SY 21 | SY 22  | % Failed<br>SY 22   | SY 22 Comments   |
|  | 11 | Was the Initial Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?   | 31  | 16%               | 1  | 1%                | 0  | 0%  | Out of 35 threat assessments   |
| 100 000 0000 1000000                             | 12 | Was the Initial Student Interview Form substantially complete?   | 0   | 0%                | 0  | 0%                | 0  | 0%  | The 3 Initial Student Interviews   |
| Initial Phase/Triage                             | 13 | Was the Initial Student Interview completed by the school-based administrator?   | 0   | 0%                | 3  | 4%                | 3  | 9%  | were completed by a MHP and did  |
| Process  | 14 | Was the Teacher Input Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?  | 40  | 20%               | 2  | 3%                | 0  | 0%  | not contain documentation<br>supporting that the SBA was part<br>of the interview. |
|  | 15 | Was the Teacher Input Form substantially complete?   | 0   | 0%                | 0  | 0%                | 0  | 0%  |  |
| Witness Interview(s)                             | 16 | Was the Witness Interview Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?  | N/A   |                   | 15   | 37%               | 8  | 57%   | Out of the 14 BTAs where Witness<br>Interview Forms were applicable, 5             |
| (required only if any witnesses were identified) | 17 | Was the Witness Interview Form substantially complete?   |   |                   | 1 3%   | 0                 | 0%   | of the 8 provided the Witness<br>Interview Forms but were not |  |
| INC. A III - I II - II - III - III - II - I      | 18 | Was the Witness Interview completed by the school-based administrator?   | 1   |                   | 0  | 0%                | 0  | 0%  | uploaded into EdPlan.  |
|  | 19 | Was the Behavioral Threat Assessment created in EdPlan?  | 0   | 0%                | 0  | 0%                | 0  | 0%  |  |
| BTA Part 1: Incident                             | 20 | Was the BTA Part 1 substantially complete?   | 0   | 0%                | 0  | 0%                | 0  | 0%  | Out of 35 threat assessments   |
| Information                                      | 21 | Was the BTA initiated within 24 hours (when school was in session or no later than the end of the first day school was back in session); if no, was a reason for delay documented in EdPlan? | 17  | 9%                | 0  | 0%                | 0  | 0%  | Out or 35 threat assessments   |
|  | 22 | Was the BTA Part 2 substantially complete?   |   | N/A               | 0  | 0%                | 8  | 23%   |  |
| BTA Part 2: Data Collection                      | 23 | If the student previously exhibited behaviors of concern or posed a threat, was the description (narrative) of prior incidents substantially complete?                                       | 0   | 0%                | 0  | 0%                | 0  | 0%  | Out of 35 threat assessments   |
|  | 24 | Was the Clinical Parent Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?   |   | N/A               | 0  | 0%                | 1  | 3%  |  |
|  | 25 | Was the Clinical Parent Interview substantially complete?  | 34  | 21%               | 0  | 0%                | 0  | 0%  | 1  |
| Clinical Interviews (required for Substantive    | 26 | Was the Clinical Parent Interview completed by mental health professional?   | 13  | 10%               | 0  | 0%                | 0  | 0%  | Out of 35 threat assessments   |
| Threats only)                                    | 27 | Was the Clinical Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?  | 39  | 24%               | 0  | 0%                | 1  | 3%  | Out of 35 tilleat assessments  |
|  | 28 | Was the Clinical Student Interview substantially complete?   | 0   | 0%                | 0  | 0%                | 0  | 0%  | 1  |
|  | 29 | Was the Clinical Student Interview completed by a mental health professional?  | 11  | 9%                | 1  | 2%                | 0  | 0%  | 1  |



## SY 2020 THROUGH SY 2022 COMPARISONS - CONTINUED

|   |    |   |     | rious: 43<br>122<br>It: 19<br>led: 16 | Sam<br>Very Ser<br>Serious:<br>Transien<br>Unfound | 39<br>t: 24       | Sam<br>Very Ser<br>Serious:<br>Transien<br>Unfound | 15<br>t: 0        |  |  |
|---|----|---|-----|---------------------------------------|--|-------------------|--|-------------------|--|--|
| Attributes  |    |   |     | % Failed<br>SY 20                     | SY 21  | % Failed<br>SY 21 | SY 22  | % Failed<br>SY 22 | SY 22 Comments   |  |
| BTA Part 3: Analysis, Risk<br>Level, and Student Support<br>Plan              | 30 | Was the BTA Part 3 substantially complete?  |     | N/A                                   | 0  | 0%                | 0  | 0%                | 1  |  |
|   | 31 | Was the parent/quardian contacted?  | 0   | 0%                                    | 1  | 1%                | 0  | 0%                | Out of 35 threat assessments   |  |
|   | 32 | Was the parent/guardian contact documentation (narrative) substantially completed?  | 0   | 0%                                    | 1  | 1%                | 0  | 0%                |  |  |
|   | 33 | Was the BTA finalized in EdPlan?  | 0   | 0%                                    | 0  | 0%                | 0  | 0%                |  |  |
|   | 34 | Was the Signatures page of the BTA uploaded to the BTA in EdPlan?   | 0   | 0%                                    | 0  | 0%                | 0  | 0%                |  |  |
|   | ** | Was the BTA finalized within 24 hours; if not, was the reason documented?   | 108 | 54%                                   | 33   | 44%               | 0  | 0%                |  |  |
|   | 35 | Was the BTA signed by all team members as required?   | 86  | 43%                                   | 1  | 1%                | 0  | 0%                |  |  |
|   | 36 | Did the Principal acknowledge BTA in EdPlan? (within approx. 48 hours)  | 0   | 0%                                    | 30   | 40%               | 0  | 0%                |  |  |
|   | 37 | Did the Cadre Director acknowledge BTA in EdPlan?   |     | N/A                                   | 15   | 20%               | 0  | 0%                |  |  |
|   | 38 | Was the completed BTA documented in TERMS?  | 87  | 44%                                   | 0  | 0%                | 3  | 9%                |  |  |
| Monitoring Plan (required<br>for Serious/Very Serious<br>Substantive Threats) | 39 | Was the Monitoring Plan created?  | 99  | 60%                                   | 0  | 0%                | 3  | 9%                | Out of 35 threat assessments  For attribute 39, the 3 students that did not have monitoring plans created did have updated Functional Behavior Assessment / Positive Behavior Intervention Plans (FBA/PBIP) in EdPlan. |  |
|   | 40 | Was the Monitoring Plan finalized in EdPlan?  | 3   | 5%                                    | 11   | 22%               | 0  | 0%                |  |  |
|   | 41 | Was the Monitoring Plan finalized within 72 hours of completing BTA parts 1-3?  | 52  | 83%                                   | 15   | 38%               | 8  | 23%               |  |  |
|   | 42 | Was the Signatures page of the Monitoring Plan uploaded to the BTA in EdPlan?   | 3   | 5%                                    | 0  | 0%                | 0  | 0%                |  |  |
|   | 43 | Was the Monitoring Plan signed by all monitoring plan meeting participants?   | 66  | 100%                                  | 25   | 63%               | 3  | 9%                |  |  |
|   | 44 | Was the Monitoring Plan reviewed/modified by all team members every 30 school days (or earlier if warranted).   | 54  | 82%                                   | 10   | 25%               | 1  | 3%                |  |  |
|   | 45 | Was the Monitoring Plan documentation maintained for all actions selected on the monitoring plan, when applicable.  | 0   | 0%                                    | 2  | 4%                | 3  | 9%                |  |  |
| Transferred Students: Continuation of Intervention Services                   | 46 | Did the administrator at the receiving school of a transfer student, within the district, review the BTA file in EdPlan within 72 hours?  |     | N/A                                   |  | 0%                | 2  | 33%               | Out of 6 students that transferred within the District   |  |
|   | 47 | If notification of the student's transfer to an out-of-district school was received, did the BTA team confirm that intervention services remain available, as applicable, until the BTA team of the receiving school independently determines the need for intervention services? | N/A |                                       | 0  | 0%                | N/A  | N/A               | No reports of students transferring out of the District  |  |

<sup>\*\*</sup> BTA Procedures Manual as amended on 3/8/2022 eliminated the requirement to finalize a BTA within 24 hours. SBBC Policy 4380, as amended on 5/17/2022, instituted a requirement to finalize BTAs within 72 hours. This change in policy occurred in the middle of this audit's scope period. There were three (3) BTAs finalized after 72 hours, but all three of these occurred prior to 5/17/2022 resulting in zero (0) exceptions. For informational purposes, the three BTAs finalized after 72 hours were attributable to one (1) High School, one (1) Elementary School, and one (1) Center.

BROWARD County Public Schools

# APPENDIX I: BEHAVIORAL THREAT ASSESSMENT DEPARTMENT RESPONSE



# Behavioral Threat Assessment Department Ernie Lozano, Executive Director

6530 W Sunrise Blvd Fort Lauderdale, Florida 33301

phone: 754-321-3530

ernie.lozano@browardschools.com

www.browardschools.com

## The School Board of Broward County, Florida

Laurie Rich Levinson, Chair Patricia Good, Vice Chair

> Lori Alhadeff Daniel P. Foganholi Debra Hixon Donna P. Korn Sarah Leonardi Ann Murray Nora Rupert

Dr. Vickie L. Cartwright Superintendent of Schools

August 30, 2022

TO: Jaime Alberti, Chief, Safety, Security, & Emergency Preparedness

Office of Safety, Security, & Emergency Preparedness

FROM: Ernie Lozano, Executive Director

Behavioral Threat Assessment Department

SUBJECT: District Responses to 2022 Behavioral Threat Assessment Audit

Based on data from prior audits, staff input, and the recommendation of the School Safety Task Force, Dr. Cartwright initiated the creation of a department within the Safety, Security, and Emergency Preparedness Division to lead and monitor the threat assessment processes within the District. On May 17, 2022, the School Board approved the creation of the Behavioral Threat Assessment (BTA) department to be initiated on July 1, 2022. The new BTA department consists of 11 staff members in total.

The role of the BTA department will be:

- to coordinate the creation of a District Threat Assessment Review Team to evaluate all very serious substantive threats
- to ensure all state statutes, requirements from Office of Safe Schools, district policies and procedures regarding threat assessments are implemented with fidelity
- to support schools with the creation of the school-based BTA Core Team
- to provide required and ongoing professional development to district and school-based staff in threat assessment implementation
- to provide support to schools with using electronic threat-reporting database
- to support schools with conducting and completing threat assessments
- to support schools with implementing and developing monitoring plans
- to coordinate threat assessment processes with municipalities and law enforcement agencies
- to ensure schools schedule and conduct Monthly Threat Assessment Team Meetings
- to collaborate with others on the review of our threat assessment process audits
- to conduct quality assurance reviews of completed threat assessments and provide feedback to schools
- to assist schools with informing students, staff, and community on processes and resources to report threats
- to collaborate with district departments to ensure students receive necessary support

The creation of this department enables the District to provide consistency and efficiency to the BTA processes, professional development, BTA awareness and reporting activities, and collaboration around student support.



Below are the district responses for each attribute that had a fail rate greater than 0% on the 2022 Behavioral Threat Assessment Audit conducted from March 8<sup>th</sup> through June 8<sup>th</sup>. The Behavioral Threat Assessment Department is focused on continuous improvement and will work with school leaders to correct the issues identified in this audit. The two areas of continued focus are BTA Training and Monitoring Plans. The inclusion of Witness Interview Forms in EdPlan has been addressed with school leaders. The electronic database will now ensure compliance with this attribute. There were many improvements from the prior audit to this current audit. The Behavioral Threat Assessment Department is committed to ensuring threat assessments are in compliance with School Board Policy 4380 and Florida Department of Education State Statutes.

#### **School BTA Roles**

### **Attribute 1 District Response**

Schools are required to identify their Core Behavioral Threat Assessment (BTA) Team on the School Profile Form in EdPlan. The Behavioral Threat Assessment Department shared expectations with all principals and assistant principals on August 3, 2022, during Leadership Week. These are required fields that must be completed prior to finalizing the assessment form. Updated School Profile Forms are to be completed by September 15<sup>th</sup> of every school year. The Behavioral Threat Assessment Department is reviewing all School Profile Forms to ensure schools have the required BTA Core Team Members identified. For the two samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for identifying members of the BTA Core Team.

Estimated Completion Date - September 2022

### **BTA Training**

### **Attribute 3 District Response**

Per state statute, all members of the school's BTA Core Team must complete the CSTAG training requirement to participate in a BTA Meeting as a Core Team Member. The Behavioral Threat Assessment Department is reviewing the EdPlan Database to ensure schools have the required CSTAG Level 2 Completion Certificate uploaded in EdPlan. New staff assigned to the BTA Core Team has ninety days from their start date to complete the required CSTAG Training.

Per School Board Policy 4380, all members of the school BTA Core Team must complete an annual refresher requirement to participate in a BTA Meeting as a Core Team Member. The Behavioral Threat Assessment Department is pulling reports from Learning Across Broward (LAB) to ensure BTA Core Team Members have completed the required annual refresher course.

Out of the 212 employees listed as BTA Core Team Members in the sample who should have completed the training, the breakdown of the 38 members who did not complete the required annual refresher training were 9 school-based administrators, 24 teachers, and 5 mental health professionals. Schools list additional members to support the BTA Core Team in addition to one of the required members to fill each role. For example, all administrators are listed for a school with multiple assistant principals. There was a communication issue with the use of teachers as a Core BTA Team Member. A majority of schools in which the teacher did not complete the annual refresher training was due to the school rotating the teacher role to include a teacher that was familiar with the student. Guidance was provided to all school leaders on August 3, 2022, on the proper role of the expert in instruction/curriculum member of the BTA Core Team. For every sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff ensuring that all school-based administrators and BTA Core Team members complete the annual refresher training.

Estimated Completion Date - September 2022



### **Attribute 4 District Response**

Per state statute, all members of the school BTA Core Team must complete the CSTAG training requirement to participate in a BTA Meeting as a Core Team Member. The Behavioral Threat Assessment Department is reviewing the EdPlan Database to ensure schools have the required CSTAG Level 2 Completion Certificate uploaded into EdPlan. The uploaded certificate ensures the principal is aware of all members of the BTA Core Team that completed the CSTAG training requirement. New staff assigned to the BTA Core Team have ninety days from their start date to complete the required CSTAG Training. For every sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for ensuring that all school-based administrators and BTA Core Team members complete the required CSTAG training.

Estimated Completion Date – September 2022

### **Attribute 5B District Response**

The District and schools completed many activities to inform parents and students of threat awareness and threat reporting during the 2021 - 2022 School Year. The audit looked for specific documentation of how this attribute was implemented at each school in the sample. To support schools with having documentation with this attribute, the Behavioral Threat Assessment Department reviewed the mechanisms for informing students and parents of threat awareness and reporting.

During the School Safety, Security, and Emergency Presentation held on August 3, 2022, expectations and processes for informing students and parents of threat awareness and reporting were reviewed with all principals and assistant principals. The Behavioral Threat Assessment Department will support schools throughout the year with informing students and parents of threat awareness and reporting. Schools use multiple means of communication to share this information with students and parents such as SaferWatch with Alyssa's Alert Posters, FortifyFL posters, school assemblies, classroom guidance lessons, school website, school newsletters, Social Media, ParentLink, parent meetings, etc. The District also provides parents with information on threat awareness and reporting through the District's website, ParentLink, etc. For every sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for ensuring that documentation is available to show how the school informs students and parents of threat awareness and threat reporting.

Estimated Completion Date- September 2022

### Student Risk Intake Form Attribute 9 District Response

Mental Health Professionals are recommended to assist with these interviews. The procedural manual clearly indicates that the initial student interview is to be conducted by an administrator. An administrator must be present to conduct the interview as they are the team leader for BTA. In some cases, when a Threat to Self is reported the Intake Form is initiated by a Mental Health Professional. It is acceptable practice for the Student Risk Intake Form to be completed by a Mental Health Professional when the incident begins as a Threat to Self. For the 2 samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing the Student Risk Intake Form.

Estimated Completion Date- August 2022

# Initial Phase/Triage Process- Initial Student Interview and Teacher Input Forms Attribute 13 District Response

There was an Initial Student Interview Form completed for every sample. For three samples the Initial Student Interview Form was completed by a Mental Health Professional and not a School-based Administrator. It is recommended that a Mental Health Professional attends the meeting when an Initial Student Interview Form is completed. When an Initial Student Interview Form is initiated as a Threat to Self, it is appropriate for the Mental



Health Professional to complete the form. For the 3 samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing the Initial Student Interviews. *Estimated Completion Date- August 2022* 

#### **Witness Interview**

### **Attribute 16 District Response**

Of the 8 samples that did not have a Witness Interview Form present in EdPlan, 5 of the schools provided documentation of the Witness Interview Form. The form was not uploaded into EdPlan. During the School Safety, Security, and Emergency Presentation held on August 3, 2022, expectations and processes for properly completing the Witness Interview Form were reviewed with all principals and assistant principals. In addition, a feature in EdPlan was added to ensure there is an attachment added into EdPlan for all witnesses listed on the Student Risk Intake Form before a threat assessment can be finalized. For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing the Witness Interview Form.

Estimated Completion Date- August 2022

# **BTA Part 1: Incident Information Attribute 21 District Response**

There was one sample in which the Behavioral Threat Assessment was not initiated with 24 hours. The incident was initially reported as profanity towards a teacher. The school received more information and determined a Behavioral Threat Assessment was necessary. The school completed a BTA, but did not initiate it in EdPlan within 24 hours. For the sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for initiating a BTA once an administrator is made aware of a threat.

Estimated Completion Date- August 2022

### BTA Part 2: Data Collection Attribute 22 District Response

For the 8 samples that failed this attribute, the schools were missing one or two of the record review requirements. Either the Academic Record Review and/or ESE, 504, Gifted Review section was not documented in EdPlan. All other required components of Part 2 were completed. The EdPlan system is built to ensure all required components are completed before a finalization can be completed. For some reason the check-and-balance for the record review section was not stopping schools from moving forward. This has been rectified and currently schools cannot move forward to Part 3 without all the required components of Part 2 completed. For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing the Record Review in EdPlan.

Estimated Completion Date- August 2022

#### **Clinical Interviews**

#### **Attribute 24 District Response**

There was one sample that was missing the Clinical Parent Interview. This was a system issue since schools cannot finalize a substantive threat without this document present in EdPlan. This issue was reviewed with Public Consulting Group. During the 2022 - 2023 School Year, the Behavioral Threat Assessment Department is reviewing all substantive threats to ensure the Clinical Parent Interview is present in EdPlan. For the sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing the Clinical Parent Interview in EdPlan.

Estimated Completion Date- August 2022



### **Attribute 27 District Response**

There was one sample that was missing the Clinical Student Interview. This was the same sample that failed Attribute 24. This was a system issue since schools cannot finalize a substantive threat without this document present in EdPlan. This issue was reviewed with Public Consulting Group. During the 2022 - 2023 School Year, the Behavioral Threat Assessment Department is reviewing all substantive threats to ensure the Clinical Student Interview is present in EdPlan. For the sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing the Clinical Student Interview in EdPlan.

Estimated Completion Date- August 2022

### **Attribute 38 District Response**

For the 3 samples that failed this attribute, two were not located in TERMS and one had the incorrect threat code listed for the threat level. The District Information & Technology (IT) Department assists with the entering of threat assessment codes into TERMS. A weekly report is sent to IT and verification takes place to ensure all codes are entered into TERMS. The process will become automated through EdPlan and TERMS in the 2022 – 2023 School Year to ensure the correct code is entered into TERMS for all finalized threat assessments. A meeting was held between IT and the Threat Assessment Department to ensure 100% compliance with this attribute.

Estimated Completion Date- August 2022

### **Monitoring Plan**

### **Attribute 39 District Response**

Three samples were identified as not having a monitoring plan created. The three samples that failed were ESE Students who had an active Functional Behavior Assessment/Positive Behavior Intervention Plan (FBA/PBIP) in EdPlan. In an effort to not duplicate and implement multiple plans for the same student, the three schools updated/reviewed the FBA/PBIP as applicable. Conversations with the ESE Department and the Behavioral Threat Assessment Department will be scheduled to develop the proper protocol for monitoring plans when a student has a current FBA/PBIP.

Estimated Completion Date- September 2022

#### **Attribute 41 District Response**

Eight samples were identified as not having a Monitoring Plan completed within 72 hours after a threat assessment was finalized, for all eight samples a monitoring plan was completed. The schools did not finalize the monitoring plan because the student did not return to campus after the incident and they were waiting for determination of student placement to work with next school before finalizing the monitoring plan. For the 2022 – 2023 School Year, all schools will finalize a monitoring plans for substantive threats within 72 hours as if the student is returning to their school. During the School Safety, Security, and Emergency Presentation held on August 3, 2022, expectations and processes for properly completing and finalizing a monitoring plan were reviewed with all principals and assistant principals. In addition, for the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing and finalizing monitoring plans in EdPlan.

Estimated Completion Date- August 2022

### **Attribute 43 District Response**

For 3 samples, there were not signatures for all members who participated in the development of the monitoring plans. In 2 samples, the parent's signature was missing and in one sample the administrator was under the impression the electronic signatures were captured in EdPlan. For the 3 samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for capturing signatures for meeting participants in EdPlan. The Behavioral Threat Assessment Department will review signature pages to ensure all required signatures are present in EdPlan.

Estimated Completion Date- August 2022



### **Attribute 44 District Response**

One sample was identified as not completing one of the thirty day review meetings for an active monitoring plan. The documentation that the monitoring plan was being implemented with fidelity was present. For the sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for reviewing active monitoring plans.

Estimated Completion Date- August 2022

### **Attribute 45 District Response**

Three samples did not have the documentation that one of the action steps identified were implemented. For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for documenting that the action steps selected in a monitoring plan are implemented with fidelity. The Behavioral Threat Assessment Department followed up with the three schools to ensure the actions identified will be carried out for the 2022 - 2023 school year.

Estimated Completion Date- August 2022

### **Attribute 46 District Response**

For 2 samples, there was no evidence in EdPlan that the school staff reviewed the threat assessment or active monitoring plan within 72 hours. Both samples that failed were students who transferred from a District traditional school to a District alternative school. Before the student enrolls in the alternative school, a meeting is held with both schools to review all student documents and prepare for the transition of the student. For the 2022 – 2023 School Year, BTA/Monitoring Plan Review will be a standard agenda item to ensure there is documentation that the threat assessment and/or active monitoring plan is reviewed. The Behavioral Threat Assessment Department followed up with the 2 schools to ensure an administrator from the school reviews the documentation within EdPlan within the required 72 hours of student enrollment.

Estimated Completion Date- September 2022



## APPENDIX II: CONSOLIDATED DISTRICT CABINET RESPONSES



# ALAN STRAUSS, SOUTH REGIONAL SUPERINTENDENT, TEACHING & LEARNING OFFICE OF SOUTH REGIONAL SUPERINTENDENT

**PHONE:** 754-321-3200 **FAX:** 754-321-3216 **EMAIL:** alan.strauss@browardschools.com

DATE: August 24, 2022 <u>Signature on File</u>

TO: Joris Jabouin, Chief Auditor

Office of the Chief Auditor

FROM: Alan Strauss

South Regional Superintendent, Teaching & Learning

VIA: Dr. Marilyn A. Doyle

Deputy Superintendent, Teaching & Learning

SUBJECT: RESPONSE TO BEHAVIORAL THREAT ASSESSMENT AUDIT SCHOOL YEAR 2021-22

This correspondence comes as a response to the Behavioral Threat Assessment Audit for the 2021-22 school year. I have had the opportunity to review the audit findings. The South Regional Superintendent's Office has made the Behavior Threat Assessment Process a priority with our schools. The findings, recommendations, and leadership responses from school years 2019-20 and 2020-21 audits provided us with areas to focus on as well as areas needing improvement for the 2021-22 school year.

Behavioral threat assessment is a standing item on our weekly staff meeting agenda. It will include a review of the BTA members attending training, reporting protocols and notification methods to assist school leaders as they guide their respective teams in this area. My office will conduct regular analyses of school-specific behavioral threat assessment procedures and outcomes in schools with staff from the Behavioral Threat Assessment department. These cross-functional discussions will be beneficial for the schools and central office support teams.

Again, I want to reiterate my office's unwavering commitment to ensuring the correct application of threat assessment protocols and timelines in our schools. We look forward to our continued partnership with our colleagues as we support school leaders in this work. Thank you for the opportunity to respond to this comprehensive audit report.

AS:mg

cc: Extended Cabinet Members

Teresa Hall, Teaching & Learning Director

Saemone Hollingsworth, Teaching & Learning Director

Davida Johnson, Teaching & Leaning Director

Dr. Alister Alexis, Assistant Teaching & Learning Director



# DARIUS S. ADAMSON, SR., REGIONAL SUPERINTENDENT CENTRAL REGION

**PHONE:** 754-321-3000 **FAX:** 754-321-3049 **EMAIL:** darius.adamson@browardschools.com

August 24, 2022

TO: Joris Jabouin, Chief Auditor

Office of the Chief Auditor

FROM: Darius S. Adamson, Sr.

Central Regional Superintendent

Through: Dr. Marilyn Doyle

Deputy Superintendent, Teaching and Learning

SUBJECT: RESPONSE TO BEHAVIORAL THREAT ASSESSMENT AUDIT SCHOOL YEAR 2021-2022

This correspondence comes as a response to the Behavioral Threat Assessment Audit for the 2021-2022 school year. The Central Regional office and team have reviewed the report and have taken the corrective actions necessary to improve the execution of protocol and practice at our school sites, as outlined in the Behavioral Threat Assessment process and procedures.

The Central Region team will continue to take a proactive approach to minimizing errors in the Behavioral Threat Assessments Process, with a focus on:

- Ongoing monitoring of related training and execution of training protocols for Behavior Threat Assessment school teams with Safety, Security and Emergency Preparedness
- Ongoing progress monitoring, with an intent to monitor and provide direct, timely feedback to schools on the necessary corrective actions, with the supports
- Maintain a continued focus on embedding the behavioral threat assessment process into daily and routine practice

The Central Region team is committed to our focus on improving practice as we ensure continuous improvement in our schools' processes.

#### DSA:dsa

cc: Cabinet Extended

cc: Dr. Angela Fulton, Teaching and Learning Director
 cc: Haleh Darbar, Teaching and Learning Director
 cc: Joseph Balchunas, Teaching and Learning Director
 cc: Sandra Shipman, Teaching and Learning Director



# DR. JERMAINE V. FLEMING, NORTH REGIONAL SUPERINTENDENT NORTH REGION OFFICE

PHONE: 754-321-3600 FAX: 754-321-3630 EMAIL: jermaine.fleming@browardschools.com

August 24, 2022

TO: Joris Jabouin, Chief Auditor

Office of the Chief Auditor

FROM: Dr. Jermaine V. Fleming

North Regional Superintendent

VIA: Dr. Marilyn A. Dollie

Deputy Superintendent, Teaching & Learning

SUBJECT: RESPONSE TO BEHAVIORAL THREAT ASSESSMENT AUDIT SCHOOL YEAR 2021-2022

Please find this communication as a response to the Behavioral Threat Assessment Audit for the 2021-2022 school year. My leadership team and I have reviewed the comprehensive report and the files that referred to schools located in the North Region. The North Region Office will continue to make the Behavior Threat Assessment Process a priority for our division. The findings, recommendations, and leadership responses from school years 2019-20, 2020-21 and 2021-22 audits will guide our methodology as we monitor and provide support to our schools.

The North Regional Office Leadership Team will meet monthly with the Behavioral Threat Assessment Department to discuss trends, findings, and address any relevant corrective actions needed. The Behavior Threat Assessment topic will remain as a standing item on our weekly staff meeting agenda. It has been expanded to include a review of the reporting protocols and notification methods to assist school leaders as they guide their respective teams in this area.

We will continue to conduct regular analysis of school-specific behavioral threat assessment procedures and outcomes in schools with staff from the Behavioral Threat Assessment team. If the result of our findings warrants, we are prepared to administer disciplinary actions to school leaders and discuss areas for system and training improvements.

By way of this communication, I express my commitment to the appropriate and timely application of the threat assessment protocols for all the school is the North Region. This audit report has provided tangible data and evidence that will aid us in providing the appropriate support to our schools. The safety and security of our students and community are paramount.

JVF:spr

C: Extended Cabinet Members
North Region Office Leadership Team

Educating Today's Students to Succeed in Tomorrow's World



# DR. VALERIE S. WANZA, ASSOCIATE SUPERTENDENT OFFICE OF ASSOCIATE SUPERINTENDENT

PHONE: 754-321-3800 FAX: 754-321-3886 EMAIL: valerie.wanza@browardschools.com

DATE:

August 24, 2022

TO:

Joris Jabouin, Chief Auditor Office of the Chief Auditor

FROM:

Dr. Valerie S. Wanza

Associate Superintendent, Non-Traditional Schools

VIA:

Dr. Marilyn A. Dayle

Deputy Superintendent, Teaching & Learning

SUBJECT: RESPONSE TO BEHAVIORAL THREAT ASSESSMENT AUDIT SCHOOL YEAR 2021-22

This correspondence comes as a response to the Behavioral Threat Assessment Audit for school year 2021-22. I have had the opportunity to review a summary of the finding for each attribute. While the three-year trend data of the tested attributes demonstrate improvement in some areas, we recognize other areas demand continuous attention. I look forward to discussing this information in great length during my staff meetings and our monthly principals' meetings.

My administrative team has completed the required annual training in this area. We will work with our schools to ensure the school-based teams are meeting the same expectation. Additionally, we will enhance our weekly support and monitoring protocols to provide additional oversight for the attributes with persistent compliance concerns. We will administer the appropriate administrative actions with schools based on findings.

My office looks forward to working with our colleagues in the newly formed Behavioral Threat Assessment Department. Indeed, their partnership will be invaluable. Their findings and recommendations will inform our administrative processes and procedures to support schools and hold them accountable for policy requirements.

As always, my team and I remain steadfast in our commitment to this process. We understand and respect the seriousness of this work. Thank you for the opportunity to review and respond to this audit report.

VSW:tbm

CC:

**Extended Cabinet Members** 

Estella Eckhardt, Teaching & Learning Director Chris Bolden, Assistant Teaching & Learning Director



# NICOLE M. MANCINI, Ed.D., CHIEF ACADEMIC OFFICER OFFICE OF ACADEMICS

PHONE: 754-321-2618 FAX: 754-321-2701 EMAIL: nicole.mancini@browardschools.com

DATE: August 24, 2022

TO: Joris Jabouin, Chief Auditor

Office of the Chief Auditor

FROM: Dr. Nicole M. Mancini, Chief Academic Officer

Office of Academics

SUBJECT: AUDIT COMMITTEE RESPONSE - BEHAVIORAL THREAT ASSESSMENT (BTA)

Broward County Public Schools (BCPS) places student safety and security as the foundation of its responsibility to students and staff. Behavioral Threat Assessment (BTA) training was rolled out in the Spring 2022 through Navigate 360. Explicit instructions were provided to all schools on the completion of Part 1 and Part 2 as well as submitting the necessary documentation for completion. Moving forward, the newly created BTA Department has added specific positions to focus on BTA training: registration, facilitation, attendance, completion, and submission of proper documentation for reporting. This added focus, oversight, and support should enable school staff with completing the required actions within the specified time frame. The Office of Academics will work collaboratively with the BTA department to ensure staff serving as BTA Core Team Members and schools are assisted with the completion of threat assessment documents for the required trainings.



# Office of Safety, Security and Emergency Preparedness Jaime Alberti, Chief Safety & Security Officer

600 Southeast Third Avenue Fort Lauderdale, Florida 33301

phone: 754-321-2655 • fax: 754-321-2704 jaime.alberti@browardschools.com

www.browardschools.com

## The School Board of Broward County, Florida

Laurie Rich Levinson, Chair Patricia Good, Vice Chair

> Lori Alhadeff Daniel P. Foganholi Debra Hixon Donna P. Korn Sarah Leonardi Ann Murray Nora Rupert

Dr. Vickie L. Cartwright Superintendent of Schools

August 24, 2022

TO: Joris Jabouin, Chief Auditor

Office of the Chief Auditor

FROM: Jaime Alberti, Chief, Safety, Security, & Emergency Preparedness

Office of Safety, Security, & Emergency Preparedness

### SUBJECT: RESPONSE TO RSM BEHAVIORAL THREAT ASSESSMENT AUDIT

This correspondence comes as a response to the RSM Compliance Audit for Threat Assessment Procedures during the 2021 – 2022 school year. For the 2022 – 2023 school year, Superintendent Cartwright established a Behavioral Threat Assessment Department under the Safety, Security, & Emergency Preparedness Division to lead the oversight of threat assessment processes in the District. I will collaborate with the Executive Director of this department to ensure threat assessments are completed with fidelity and are in compliance with School Board Policy 4380, Threat Assessments. I have met with the Executive Director to establish clear expectations for the monitoring of threat assessments and the support provided to schools. During our weekly staff meetings, threat assessment data is reviewed, and action steps are taken to remediate any deficiencies. This audit only included substantive threats in the sample. Even with the complexities associated with substantive threats, our schools improved on many of the attributes evaluated. My focus is to ensure that the attributes that revealed opportunities for improvement are addressed and corrected immediately.

There were many improvements identified in this audit from the 2020-2021 school year. The fail rate for principals improved from 40% in 2021 down to 0% in 2022. The Cadre Director fail rate improved from 20% to 0%. The signatures for monitoring plans improved from a fail rate of down to 63% to 9%. The finalization of monitoring plans improved from a fail rate of 22% down to 0%. The review of monitoring plans improved from a fail rate of 25% down to 3%. This data shows the district's commitment to continuous improvement in threat assessment implementation.

On August 3, 2022, during Leadership Week, my staff facilitated a half-day presentation on Safety, Security, & Emergency Preparedness to all school administrators. A substantial portion of the presentation addressed the threat assessment process. Specifically, the conversation centered around the required trainings for the 2022 – 2023 school year, informing parents, students, and staff about threats or aberrant behavior, and the many different ways to report threats in Broward County Public Schools. The presentation also focused on the correct process to conduct, complete, and upload Witness Interview Forms into EdPlan. The Behavioral Threat Assessment Department is reviewing every School Profile Form to ensure the required members are listed as a member of the BTA Core Team and have completed the required training. This department has also requested to have a standing agenda item during monthly level principal and assistant principal meetings.

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The Behavioral Threat Assessment Department meets weekly with Public Consulting Group (PCG), district staff, and school-based leaders to discuss the threat assessment process and make enhancements to the electronic platform to ensure fidelity of implementation. Schools can no longer move forward to Part 3 of the assessment unless the three required components of the record review are responded to in Part 2. The system will now ensure that for every witness listed on the Student Risk Intake Form a Witness Interview Form is included in EdPlan. The Behavioral Threat Assessment Department reviews finalized threat assessments to ensure that all required documents are present in EdPlan.

I have directed the Executive Director of the Behavioral Threat Assessment Department to meet with the discipline center sites in our district to conduct an immediate review of threat assessment records and information between the sending and receiving school. The Behavioral Threat Assessment Department has also addressed the issues of monitoring plans not being finalized within 72 hours of a completed threat assessment. For many extremely serious substantive threats, students never return to the school they attended when the threat occurred, making it difficult for school administrators to complete the threat assessment within the required 72 hours. Schools normally wait for the final outcome of the student's placement before completing the monitoring plan. During the 2022 – 2023 school year, all schools that finalize a substantive threat must complete a monitoring plan within 72 hours of finalizing the threat assessment in anticipation of the student returning to campus.

The audit findings enable us to improve practices and close any gaps in the threat assessment process. I understand the seriousness of completing threat assessments and will continue to leverage my division and work collaboratively with the Office of Academics and the Office of Student Services to support schools in conducting threat assessments and implementing monitoring/safety plans.

JA

cc: Dr. Marilyn Doyle, Deputy Superintendent, Teaching & Learning Dr. Valerie Wanza, Associate Superintendent Dr. Nicole Mancini, Chief Academic Officer Regional Superintendents



# DR. MARILYN A. DOYLE DEPUTY SUPERINTENDENT, TEACHING & LEARNING

**PHONE:** 754-321-2100 **FAX:** 754-321-2701

### Signatures on File

August 19, 2022

TO: Joris Jabouin, Chief Auditor

Office of the Chief Auditor

FROM: Dr. Marilyn A. Doyle

Deputy Superintendent, Teaching & Learning

SUBJECT: RESPONSE TO RSM BEHAVIORAL THREAT ASSESSMENT AUDIT

This correspondence comes as a response to the RSM Compliance Audit for Threat Assessment Procedures during the 2021 – 2022 school year. I have reviewed the findings, recommendations, and leadership responses and shared the comprehensive report with my leadership team. The Teaching and Learning Division understands the seriousness of completing threat assessments with 100% accuracy. I would like to acknowledge the improvements made by our Principals and Directors from the 2020 – 2021 audit and I will continue to work with the Associate Superintendent and Regional Superintendents to ensure 100% compliance with Policy 4380, Behavior Threat Assessment.

For the 2022-2023 school year, Superintendent Cartwright established a Behavioral Threat Assessment Department under the Safety, Security, & Emergency Preparedness Division to lead the oversight of threat assessment processes in the District. My division will work collaboratively with our colleagues in the Behavioral Threat Assessment Department to ensure our school leaders receive the appropriate training and support in complying with the processes and procedures outlined in Policy 4380, Behavior Threat Assessment. The Behavioral Threat Assessment Department will conduct ongoing presentations throughout the year during level principal meetings, assistant principal meetings, and operational meetings. A Director of Teaching and Learning will represent our division at the weekly threat assessment meeting with our colleagues in the Office of Academics, Student Services, and Safety, Security, and Emergency Preparedness.

The Behavioral Threat Assessment Department worked collaboratively with the Public Consulting Group to improve the electronic platform to close the gaps identified in this audit. System enhancements were made to ensure required components are completed. The Behavioral Threat Assessment Department has reviewed the processes with me that their team is implementing to ensure all required trainings are completed. Throughout the 2022 – 2023 school year, my division will review the data shared by the Behavioral Threat Assessment Department and follow up with school administrators to ensure any areas of concern are rectified immediately. My team will reach out to the



Behavioral Threat Assessment Department to coordinate additional support to schools identified as needing additional training or support.

My division is committed to ensuring threat assessments are conducted with fidelity and monitoring/safety plans are implemented effectively. We look forward to our continued partnership with our colleagues who support us in this work. Thank you for assisting my division in supporting this important work.

MAD/EL:jlk

cc: Jaime Alberti, Chief Safety and Security Officer Nicole Mancini, Ed.D., Chief Academic Officer Compliance Audit – Threat Assessment Policy & Procedures Internal Audit Report Issued: August 22, 2022



# **APPENDIX III: BTA POLICY 2130**

### BEHAVIORAL THREAT ASSESSMENT (BTA)

THE SCHOOL BOARD OF BROWARD COUNTY (SBBC), FLORIDA IS COMMITTED TO PROTECTING ITS STUDENTS, EMPLOYEES, AND MEMBERS OF THE COMMUNITY. IT IS ESSENTIAL THAT DISTRICTWIDE VIOLENCE PREVENTION BE IN PLACE TO FOSTER A LEARNING ENVIRONMENT THAT PROMOTES A CULTURE OF SAFETY, RESPECT, TRUST, AND SOCIAL/EMOTIONAL SUPPORT, WHILE ALSO PROTECTING STUDENTS AND STAFF FROM CONDUCT THAT POSES AN ACTUAL OR PERCEIVED THREAT TO SELF OR OTHERS. THE BEHAVIORAL THREAT ASSESSMENT (BTA) POLICY SHALL BE INTERPRETED AND APPLIED CONSISTENTLY WITH ALL APPLICABLE STATE AND FEDERAL LAWS, AND THE BOARD'S COLLECTIVE-BARGAINING AGREEMENTS. THE POLICY DEVELOPED IN ACCORDANCE WITH THE LEGISLATION ENACTED BY THE STATE OF FLORIDA (MARJORY STONEMAN DOUGLAS HIGH SCHOOL PUBLIC SAFETY ACT, SB 7026), ESTABLISHED RESEARCH, AND RECOGNIZED STANDARDS OF PRACTICE REGARDING THREAT ASSESSMENT AND MANAGEMENT IN SCHOOL SETTINGS. THE OUTCOME OF A BTA IS NOT USED AS A PRIMARY DETERMINATION OF A DISCIPLINE CONSEQUENCE FOR A STUDENT.

### **SECTION I: DEFINITIONS**

- A. A **threat** is communication or behavior that indicates that an individual poses a danger to the safety of school staff or students through acts of violence or other behavior that would cause harm to self or others.
  - a. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means.
  - b. The communication and/or behavior is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat; observed by or communicated to a third party, and regardless of whether the target of the threat is aware of the threat.
- B. A **behavioral threat assessment** is a systematic process that is designed to identify situations/persons of concern, investigate and gather information, and assess and manage the situation in order to mitigate risk.
- C. An aberrant behavior is that which is atypical for the person or situation and causes concern for the safety or well-being of those involved. Aberrant behavior for an individual involves actions, statements, communications or responses that are unusual for the person or situation; or actions which could lead to violence toward self or others; or are reasonably perceived as threatening or causing concern for the well-being of the person. These can include (but are not limited to):
  - a. Unusual social distancing or isolation of subjects from peers and family members;

- b. Sullen or depressed behavior from an otherwise friendly and positive person;
- c. Out of context outbursts of verbal or physical aggression;
- d. Increased levels of agitation, frustration and anger;
- e. Confrontational, accusatory, or blaming behavior;
- f. An unusual interest in or fascination with weapons; and/or
- g. Fixation on violence as means of addressing a grievance.
- D. An **imminent threat** exists when the person's behavior/situation poses a clear and immediate threat of violence toward self or others that requires containment and action to protect identified or identifiable target(s); and may also exhibit behavior that requires intervention.
- E. **Substantive threats** are behaviors or statements that represent a risk of harm to others. They are characterized by qualities that reflect serious intent (such as planning and preparation, recruitment of accomplices, and acquisition of a weapon) or the intent is not clear.
- F. **Transient threats** include all threats that do not reflect a genuine intent to harm. They are often made in the heat of the moment and may be an expression of humor, rhetoric, anger, or frustration that can be easily resolved with an apology, retraction, or explanation by the person who made the threat. Transient threats can be provocative and disruptive, but from a threat assessment perspective, they do not reflect a real intent to harm others.
- G. An **unfounded/no threat** decision exists when, following a detailed account of the threat obtained by interviewing the person who made the threat, the intended victim, and other witnesses, a threat could not be corroborated or substantiated. It may also exist when the determination is made, based on the circumstances and the student's intentions, that there is no evidence of communication or behavior suggesting an intent to harm.
- H. A behavioral threat assessment team shall include, pursuant to Florida statute, persons with expertise in counseling, instruction, school administration, principal, when available, and law enforcement. Persons with expertise in counseling include school counselors, school psychologists, school social workers, and family counselors. Additional personnel with knowledge of the child or circumstances may also serve as members of the team.

### **SECTION II: PURPOSE**

- A. The primary purpose of the BTA is to determine whether an individual poses a threat, to mitigate risks, and ensure safety. Its purpose is not to determine disciplinary intervention. However, information obtained through the BTA process may be used to inform disciplinary intervention.
- B. Each school principal shall identify a school-based BTA team with the mandatory team members and alternate team members before students report to school each year.
- C. All school-based administrators and BTA team members must attend and complete mandatory district threat assessment trainings annually.

- D. All threats of violence or physical harm to self or others shall be taken seriously, since the primary goal of threat assessment is the safety of all persons involved.
- E. School-based BTA teams shall adhere to the rules and responsibilities within this policy with fidelity.

### SECTION III: DISTRICT/SCHOOL ROLES AND RESPONSIBILITIES

- A. The Chief Safety & Security Officer (Chief) shall ensure compliance with this policy.
- B. Each school principal shall identify members of a BTA team that includes persons with expertise in counseling, instruction, school administration, and law enforcement. Members will be trained on the roles and responsibilities of each team member.
- C. All school-based administrators and BTA team members must attend and complete mandatory district threat assessment trainings annually. Each mandatory team member shall report their completion of this requirement to their supervisor.
- D. The BTA team at each school must provide annual training and guidance to students, staff, and parents on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting.
- E. Each school principal must assign school-based staff members who can proactively monitor and respond to all incoming reports where safety is of concern.
- F. All SBBC employees, volunteers, and contractors are required to report to school administration any expressed threat(s) or behavior(s) that may represent a threat to the community, school, or self. Threats that are not easily recognized as harmless should be reported to the school administrator or other team member(s).
- G. Each BTA team must respond, within 24 hours when school is in session, to any report of a threat or any patterns of behavior that may pose a threat to self or others. If school is not in session, and the school principal becomes aware of a threat or a pattern of behavior by a student that may pose a threat to self or others, he/she shall immediately refer the matter to law enforcement for evaluation, and the threat assessment team must meet no later than the end of the first day school is back in session to consider the matter and ensure it is resolved.

### **SECTION IV: BTA TEAM RESPONSES**

A. When assessing a potential threat or concerning behavior, an administrator and at least one other school-based BTA team member must evaluate the threat by obtaining a detailed account of the threat, usually by interviewing the person who made the threat, the intended victim, and other witnesses. The initial key question is whether there is a communication or behavior that suggests an intent to harm someone.

- a. If the answer is *no*, the administrator and the previously selected BTA team member(s) will proceed to complete the required portions of the BTA process. However, even if there is no intent to harm, statements or behaviors may still merit attention, intervention, or services, which can be determined by the BTA Team or the appropriate school-based team (e.g., Collaborative Problem-Solving (CPS) Team, Individualized Education Plan (IEP) team, etc.)
- b. For students deemed a threat to self, the BTA team members must ensure the student's immediate safety, then refer the student to the school-based suicide prevention designee. The suicide prevention designee will meet with the student and assess the severity of the risk following the Suicide Prevention Handbook guidelines.
- c. If the answer is **yes**, and the preliminary determination by the BTA team members determines that a student poses a threat to others, the entire BTA team is responsible for assessing the level of threat by conducting student/parent interviews, reviewing all pertinent records, and following the district's threat assessment procedures.
- B. Upon a determination by the BTA team members that a student poses a threat, all BTA threat determinations must be reported to the school principal or his/her administrative designee. The principal or his/her administrative designee will serve as the Superintendent's designee.
- C. Upon a determination by the BTA team members that a student poses a threat, the principal or his/her administrative designee, who is participating in the BTA, shall immediately attempt to notify the student's parent or legal guardian. The principal or his/her administrative designee will serve as the Superintendent's designee.
- D. Upon a determination by the BTA team members that an individual poses a threat, authorized members of the BTA team may request and obtain criminal history record information, pursuant to s.985.04(1).
  - a. No member of a BTA team shall re-disclose any criminal history record information or health information obtained or use any record of an individual beyond the purpose for which such disclosure was made to the threat assessment team.
  - b. The BTA team may **not** maintain the criminal history record or place it in the student's educational file.
  - c. The BTA team must consult with law enforcement when a student exhibits a pattern of behavior, based upon previous acts, or the severity of an act, that would pose a threat to school safety.
- E. The BTA team must coordinate resources to provide intervention to individuals whose behavior may pose a threat to the safety of school staff or students consistent with the model policies developed by the Office of Safe Schools.
  - a. The BTA team must plan for the implementation and monitoring of appropriate interventions in order to manage or mitigate the student's risk for engaging in violence and increasing the likelihood of positive outcomes.

b. Interventions should remain in place until the BTA team assesses that the student is no longer in need of supports and does not pose a threat to self or others.

#### **SECTION V: FOLLOW-UP AND INTERVENTIONS**

- A. BTA teams shall follow established procedures for referrals to school-based, community, and/or health care providers for mental health services, evaluation, or treatment.
- B. The school principal will review the documentation for all threat assessments to ensure completeness and fidelity. The school principal will sign/acknowledge that the BTA documentation is complete and will forward the signed/acknowledged assessment to their supervisor.
- C. If an immediate mental health or substance abuse crisis is suspected, school personnel must follow policies to engage behavioral health crisis resources, including, but not limited to, mobile crisis teams and school resource officers, who have been trained in crisis intervention. These individuals shall provide emergency intervention and assessment, make recommendations, and refer the student for appropriate services. BTA teams shall contact other agencies involved with the student and any known service providers to share information and coordinate necessary follow up. Any information from education records disclosed during this process shall be done in accordance with The Family Educational Rights and Privacy Act (FERPA) (34 CFR §99.31(10), §99.36).
- D. The BTA team shall identify additional members of the school community to whom threatening behavior should be reported and provide guidance to students, faculty, and staff regarding recognition of threatening or aberrant behavior that may represent a threat to the community, school, or self.
- E. BTA records are considered education records and shall be maintained and released in accordance with FERPA and state statute. The BTA process is a substantive decision-making process and therefore is not subject to the amendment process as described in School Board Policy 5100.1(V). The BTA, its determination, along with any interventions provided, will be recorded in the appropriate electronic data systems by the threat assessment team. Additionally, these records will be transferred pursuant to School Board Policy 5100.2.
  - a. Upon the student's transfer to a different school, within the district, the threat assessment team shall verify that any intervention services provided to the student remain in place until the threat assessment team of the receiving school independently determines the need for intervention services. The receiving school-based administrator will receive an alert and must follow up with the intervention implementation within 72 hours. F.S. §1003.25 requires the records to be transferred to include verified reports of serious recurrent behavior patterns, including BTA and interventions, psychological evaluations, therapeutic treatment plans and therapy and progress notes created by school.
  - b. Upon notification of the student's transfer to an out-of-district school, the BTA team will confirm that intervention services remain available, as applicable, until the BTA team of the receiving school independently

determines the need for intervention services. Transfer of student records will occur upon request from another district or parent/guardian.

- F. In addition to the BTA activities, disciplinary action and referral to law enforcement are to occur as required by law and school board policies.
  - a. If a student is facing possible expulsion or suspension as a consequence of certain actions, the school should consider ways in which these can be safely enacted and identify resources that may assist the student during this time. In addition, alternatives to expulsion or referral to law enforcement agencies may be used, unless the use of such alternatives will pose a threat to school safety.
- G. Nothing in this policy shall preclude school personnel from acting immediately to address an imminent threat and to report to the school principal, and/or his/her administrative designee, that an individual poses a threat of violence or physical harm to self or others.
  - a. Where an immediate threat to life or physical safety exists, reports must result in an immediate notification to law enforcement.
- H. The Chief Auditor will conduct annual audits, in compliance with this policy, and report findings to the Audit Committee and The School Board.

Policy Custodian: Office of Academics

Authority: F.S. §1006.07(7); F.S. §1006.13; F.S.§1003.25

History: Adopted: 3/5/2019, Revised: 10/20/2020

Compliance Audit – Threat Assessment Policy & Procedures Internal Audit Report Issued: August 22, 2022



**APPENDIX IV: BTA POLICY 4380** 



#### POLICY NO. 4380

#### BEHAVIORAL THREAT ASSESSMENT (BTA)

THE SCHOOL BOARD OF BROWARD COUNTY (SBBC), FLORIDA IS COMMITTED TO PROTECTING ITS STUDENTS, EMPLOYEES, AND MEMBERS OF THE COMMUNITY. IT IS ESSENTIAL THAT DISTRICTWIDE VIOLENCE PREVENTION BE IN PLACE TO FOSTER A LEARNING ENVIRONMENT THAT PROMOTES A CULTURE OF SAFETY, RESPECT, TRUST, AND SOCIAL/EMOTIONAL SUPPORT, WHILE ALSO PROTECTING STUDENTS AND STAFF FROM CONDUCT THAT POSES AN ACTUAL OR PERCEIVED THREAT TO SELF OR OTHERS. THE BEHAVIORAL THREAT ASSESSMENT (BTA) POLICY SHALL BE INTERPRETED AND APPLIED CONSISTENTLY WITH ALL APPLICABLE STATE AND FEDERAL LAWS, AND THE BOARD'S COLLECTIVE-BARGAINING AGREEMENTS. THE POLICY DEVELOPED IN ACCORDANCE WITH THE LEGISLATION ENACTED BY THE STATE OF FLORIDA (MARJORY STONEMAN DOUGLAS HIGH SCHOOL PUBLIC SAFETY ACT, SB 7026), ESTABLISHED RESEARCH, AND RECOGNIZED STANDARDS OF PRACTICE REGARDING THREAT ASSESSMENT AND MANAGEMENT IN SCHOOL SETTINGS. THE OUTCOME OF A BTA IS NOT USED AS A PRIMARY DETERMINATION OF A DISCIPLINE CONSEQUENCE FOR A STUDENT.

#### **SECTION I: DEFINITIONS**

- A. A **threat** is communication or behavior that indicates that an individual poses a danger to the safety of school staff or students through acts of violence or other behavior that would cause harm to self or others.
  - a. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means.
  - b. The communication and/or behavior is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat; observed by or communicated to a third party, and regardless of whether the target of the threat is aware of the threat.
- B. A **behavioral threat assessment** is a systematic process that is designed to identify situations/persons of concern, investigate and gather information, and assess and manage the situation in order to mitigate risk.
- C. An aberrant behavior is that which is atypical for the person or situation and causes concern for the safety or well-being of those involved. Aberrant behavior for an individual involves actions, statements, communications or responses that are unusual for the person or situation; or actions which could lead to violence toward self or others; or are reasonably perceived as threatening or causing concern for the well-being of the person. These can include (but are not limited to):
  - a. Unusual social distancing or isolation of subjects from peers and family

- persons.
- b. Sullen or depressed behavior from an otherwise friendly and positive person.
- c. Out of context outbursts of verbal or physical aggression.
- d. Increased levels of agitation, frustration and anger.
- e. Confrontational, accusatory, or blaming behavior.
- f. An unusual interest in or fascination with weapons; and/or
- g. Fixation on violence as means of addressing a grievance.
- D. An **imminent threat** exists when the person's behavior/situation poses a clear and immediate threat of violence toward self or others that requires containment and action to protect identified or identifiable target(s); and may also exhibit behavior that requires intervention.
- E. **Substantive threats** are behaviors or statements that represent a risk of harm to others. They are characterized by qualities that reflect serious intent (such as planning and preparation, recruitment of accomplices, and acquisition of a weapon) or the intent is not clear.
- F. **Transient threats** include all threats that do not reflect a genuine intent to harm. They are often made in the heat of the moment and may be an expression of humor, rhetoric, anger, or frustration that can be easily resolved with an apology, retraction, or explanation by the person who made the threat. Transient threats can be provocative and disruptive, but from a threat assessment perspective, they do not reflect a real intent to harm others.
- G. An **unfounded/no threat** decision exists when, following a detailed account of the threat obtained by interviewing the person who made the threat, the intended victim, and other witnesses, a threat could not be corroborated or substantiated. It may also exist when the determination is made, based on the circumstances and the student's intentions, that there is no evidence of communication or behavior suggesting an intent to harm.
- H. A behavioral threat assessment team shall include, pursuant to Florida statute, persons with expertise in counseling, instruction, law enforcement, and school administration (principal when available). Persons with expertise in counseling include school counselors, school psychologists, school social workers, and family counselors. Additional personnel with knowledge of the child or circumstances may also serve as members of the team.

#### **SECTION II: PURPOSE**

- A. The primary purpose of the BTA is to determine whether an individual poses a threat, to mitigate risks, and ensure safety. Its purpose is not to determine disciplinary intervention. However, information obtained through the BTA process may be used to inform disciplinary intervention.
- B. Each school principal shall identify a school based BTA team with the mandatory core team members and alternate core team members (e.g., additional assistant principals/administrators/social workers/instructional coaches/law enforcement/other appropriate staff) before students report to school each year.

- C. All school-based administrators and BTA team members must attend and complete mandatory district threat assessment trainings annually.
- D. All threats of violence or physical harm to self or others shall be taken seriously, since the primary goal of threat assessment is the safety of all persons involved.
- E. School-based BTA teams shall adhere to the rules and responsibilities within this policy with fidelity.

#### SECTION III: DISTRICT/SCHOOL ROLES AND RESPONSIBILITIES

- A. The designated District School Safety Specialist shall ensure compliance with this policy.
- B. Each school principal shall identify members of a BTA team that includes persons with expertise in counseling, instruction, school administration, and law enforcement. Members will be trained on the roles and responsibilities of each team member.
- C. All school-based administrators and BTA team members must attend and complete mandatory, state-approved threat assessment trainings. Each team member's completion certificate must be uploaded to the designated electronic system.
  - a. Per 6A-1.0018(10), F.A.C., those members appointed during the 2021-22 school year must complete training within ninety (90) days of appointment. Beginning with the 2022-23 school year, all threat assessment team members must complete CSTAG training before the start of the school year.
  - b. Members appointed to threat assessment teams after the start of the any school year must complete CSTAG training withing ninety (90) day of appointment.
- D. All school-based administrators and BTA team members must complete an annual refresher course. The BTA team at each school must provide annual training and guidance to students <u>and</u> staff, on recognizing behaviors of concern, their roles, and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting.
- E. School staff will inform the school community annually on recognizing concerning behaviors and the various options for reporting concerning behaviors, including anonymous reporting (e.g., FortifyFL, See Something, Say Something, Safer Watch).
- F. Parents of public-school students have a right to timely notification of threats, unlawful acts, and significant emergencies pursuant to s.1006.07.
- G. Each school principal must assign school-based staff members who can proactively monitor and respond to all incoming reports where safety is of concern.
- H. All SBBC employees, volunteers, and contractors/ vendors are expected to report to school administration any expressed threat(s) or behavior(s) that may represent a threat to the community, school, or self. Threats that are not easily recognized as harmless should be reported to the school administrator or other team member(s).

- I. Each BTA team must initiate a BTA, within 24 hours when school is in session, to any report of a threat or any patterns of behavior that may pose a threat to self or others. If school is not in session, and the school principal becomes aware of a threat or a pattern of behavior by a student that may pose a threat to self or others, he/she shall immediately refer the matter to law enforcement for evaluation, and the threat assessment team must meet no later than the end of the first day school is back in session to consider the matter and ensure it is resolved. Once school resumes the BTA core team must meet no later than the end of the first day. School teams must complete a monitoring plan if applicable. It is strongly recommended that all BTAs are finalized within 72 hours when school is in session. If the BTA is not finalized within 72 hours documentation should be entered into electronic management system explaining the extenuating circumstances.
- J. Each school-based threat assessment team must meet as often as needed to fulfill its duties of assessing and intervening with persons whose behavior may pose a threat to school staff or students, but no less than monthly. Threat assessment teams shall maintain documentation of their meetings, including dates and times, team members in attendance, cases discussed, and actions taken.
- K. Each district must ensure that all threat assessment teams in the district report by October 1 to the Office of Safe Schools on the team's activities during the previous school year. The District School Safety Specialist shall ensure all district schools timely report the information required by this paragraph by October 1 and report using the FSSAT.
  - a. For the 2021-22 school year, the information reported by each school threat assessment team shall include the total number of threat assessments conducted, the number of transient threats, and the number of substantive threats.
  - Beginning in the 2022-23 school year, the information submitted by each school threat assessment team shall include the gender, race, and grade level of all students assess by the threat assessment team

#### **SECTION IV: BTA TEAM RESPONSES**

- A. When assessing a potential threat or concerning behavior, an administrator and at least one other school based BTA team member must evaluate the threat by obtaining a detailed account of the threat, usually by interviewing the person who made the threat, the intended victim, and other witnesses. The initial key question is whether there is a communication or behavior that suggests an intent to harm someone.
  - a. If the answer is **no** (i.e., transient) the administrator and the previously selected BTA team member(s) will proceed to complete the required portions of the BTA process. However, even if there is no intent to harm, statements or behaviors may still merit attention, intervention, or services, which can be determined by the BTA Team or the appropriate school-

- based team (e.g., Collaborative Problem-Solving (CPS) Team, Individualized Education Plan (IEP) team, etc.)
- b. For students deemed a threat to self, the BTA team members must ensure the student's immediate safety, then refer the student to the school-based suicide prevention designee. The suicide prevention designee will meet with the student and assess the severity of the risk following the Suicide Prevention Handbook guidelines.
- c. If the answer is yes (i.e., substantive) and the preliminary determination by the BTA team members determines that a student poses a threat to others, all mandatory BTA team members (administrator, mental health professional, instructional employee, law enforcement, and additional personnel with knowledge of the student, when needed) are responsible for assessing the level of threat by following the state-approved threat assessment guidelines.
- B. Upon a determination by the BTA team members that a student poses a threat, all BTA threat determinations must be reported to the school principal or his/her administrative designee. The principal or his/her administrative designee will serve as the Superintendent's designee.
- C. Upon a determination by the BTA team members that a student poses a threat, the principal, or his/her administrative designee, who is participating in the BTA, shall immediately attempt to notify the student's parent or legal guardian. The principal or his/her administrative designee will serve as the Superintendent's designee.
- D. Upon a determination by the BTA team members that an individual poses a threat, authorized members of the BTA team may request and obtain criminal history record information, pursuant to s.985.04(1).
  - a. No member of a BTA team shall re-disclose any criminal history record information or health information obtained or use any record of an individual beyond the purpose for which such disclosure was made to the threat assessment team.
  - b. The BTA team may **not** maintain the criminal history record or place it in the student's educational file.
  - c. The BTA team must consult with law enforcement when a student exhibits a pattern of behavior, based upon previous acts, or the severity of an act, that would pose a threat to school safety.
- E. The BTA team must coordinate resources to provide intervention to individuals whose behavior may pose a threat to the safety of school staff or students consistent with the model policies developed by the Office of Safe Schools.
  - a. The BTA team must plan for the implementation and monitoring of appropriate interventions in order to manage or mitigate the student's risk for engaging in violence and increasing the likelihood of positive outcomes.
  - b. Interventions should remain in place until the BTA team assesses that the student is no longer in need of supports and does not pose a threat to self or others.

#### **SECTION V: FOLLOW-UP AND INTERVENTIONS**

- A. BTA teams shall follow established procedures for referrals to school-based, community, and/or health care providers for mental health services, evaluation, or treatment.
- B. The school principal will review the documentation for all threat assessments to ensure completeness and fidelity. The school principal will acknowledge that the BTA documentation is complete. The principal supervisor will acknowledge that the principal has acknowledged the BTA.
- C. If an immediate mental health or substance abuse crisis is suspected, school personnel must follow policies to engage behavioral health crisis resources, including, but not limited to, mobile crisis teams and school resource officers, who have been trained in crisis intervention. These individuals shall provide emergency intervention and assessment, make recommendations, and refer the student for appropriate services.
  - a. Schools must make a reasonable attempt to notify the parents of a minor student before the student is removed from school, school transportation, or a school-sponsored activity for an involuntary mental health examination. "A reasonable attempt to notify" means the exercise of reasonable diligence and care by the principal or the principal's designee to make contact with the student's parent, guardian, or other known emergency contact whom the student's parent or guardian has authorized to receive notification of an involuntary examination.
  - b. At a minimum, the principal or the principal's designee must take the following actions:
    - i. Use available methods of communication to contact the student's parent, guardian, or other known emergency contact, including but not limited to, telephone calls, text messages, e-mails, and voice mail messages following the decision to initiate an involuntary examination of the student.
    - ii. Document the method and number of attempts made to contact the student's parent, guardian, or other known emergency contact, and the outcome of each attempt.
    - iii. A principal or his or her designee who successfully notifies any other known emergency contact may share only the information necessary to alert such contact that the parent or caregiver must be contacted. All such information must be in compliance with federal and state law.
  - c. The district will provide annual reporting requested by the Florida Department of Education's Office of Safe Schools to include the number of involuntary examinations, as defined in s. 394.455, which are initiated at a school, on a school transportation, or at a school sponsored activity
- D. BTA teams shall contact other agencies involved with the student and any known service providers to share information and coordinate necessarily follow up. Any information from education records disclosed during this process shall be done in

- accordance with The Family Educational Rights and Privacy Act (FERPA) (34 CFR §99.31(10), §99.36).
- E. The BTA team shall identify additional members of the school community to whom threatening behavior should be reported and provide guidance to students, faculty, and staff regarding recognition of threatening or aberrant behavior that may represent a threat to the community, school, or self.
- F. BTA records are considered education records and shall be maintained and released in accordance with FERPA and state statute. The BTA process is a substantive decision-making process and therefore is not subject to the amendment process as described in School Board Policy 5100.1(V). The BTA, its determination, along with any interventions provided, will be recorded in the appropriate electronic data systems by the threat assessment team. Additionally, these records will be transferred pursuant to School Board Policy 5100.2.
  - a. Upon the student's transfer to a different school, within the district, the threat assessment team shall verify that any intervention services provided to the student remain in place until the threat assessment team of the receiving school independently determines the need for intervention services. The receiving school-based administrator will receive an alert and must follow up with the intervention implementation within 72 hours. F.S. §1003.25 requires the records to be transferred to include verified reports of serious recurrent behavior patterns, including BTA and interventions, psychological evaluations, therapeutic treatment plans and therapy and progress notes created by school.
  - b. Upon notification of the student's transfer to an out-of-district school, the BTA team will confirm that intervention services remain available, as applicable, until the BTA team of the receiving school independently determines the need for intervention services. Transfer of student records will occur upon request from another district or parent/guardian.
- G. In addition to the BTA activities, disciplinary action and referral to law enforcement are to occur as required by law and school board policies.
  - a. If a student is facing possible expulsion or suspension as a consequence of certain actions, the school should consider ways in which these can be safely enacted and identify resources that may assist the student during this time. In addition, alternatives to expulsion or referral to law enforcement agencies may be used, unless the use of such alternatives will pose a threat to school safety.
- H. Nothing in this policy shall preclude school personnel from acting immediately to address an imminent threat and to report to the school principal, and/or his/her administrative designee, that an individual poses a threat of violence or physical harm to self or others.
  - a. Where an immediate threat to life or physical safety exists, reports must result in an immediate notification to law enforcement.
- I. The Chief Auditor will conduct annual audits, in compliance with this policy, and report findings to the Audit Committee and The School Board.

Policy Custodian: Office of Academics

Authority: 20 U.S.C. §1232g; F.S. §1001.41; F.S.§ 1006.07

Laws Implemented: 34 C.F.R. §99.31(10); 34 C.F.R. §99.36; F.S.§ 394.455;

F.S. §491.018; F.S. § 985.04; F.S. §1003.25; F.S. §1006.07(7); F.S. §1006.13; Rule

6A-1.0018, Florida Administrative Code

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APPENDIX V: BTA PROCEDURES MANUAL

# Behavioral Threat Assessment (BTA)

# **Procedures Manual**



# The School Board of Broward County, Florida

For the most current version, please use electronic BTA manual located at:

http://browardschools.com/mentalhealth

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#### BEHAVIORAL THREAT ASSESSMENT

#### INTRODUCTION

On February 14, 2018, seventeen innocent lives were lost, and many others were physically injured and emotionally impacted as a result of a school shooting at Marjory Stoneman Douglas High School, a school in Broward County, Florida. Following this tragedy, new state legislation and district policy regarding school safety and threat assessment were developed and enacted. *Florida Senate Bill 7026 Marjory Stoneman Douglas High School Public Safety Act* (SB 7026) took effect on March 9, 2018 and was amended on May 9, 2019 (SB 7030). On March 5, 2019, the School Board of Broward County adopted the *Behavioral Threat Assessment Policy* (SBBC 2130). Each of these highlighted the importance of ensuring fidelity to high-quality threat assessment procedures through accountability and on-going professional development.

Broward Schools has had a mandated set of procedures for violence prevention and threat assessment. The district's approach to violence prevention and threat assessment was initiated in 2002, with the writing of the first edition of the *Threat Assessment Procedures Manual*. Since this first edition, the manual was revised regularly (2008, 2012, 2017). The district's approach to violence prevention contained three components. The first two components were comprised of a *Warning Signs* presentation and the *Silence Hurts: Safe Zone Listeners* campaign to help prevent violence in the schools by catching problems early through identifying students who may be at-risk for violent behavior. These violence prevention efforts helped create a system which could receive, record, and disseminate information from students about suspected threats in schools. As the third component of the district's approach, the Threat Assessment Process was designed as a three-stage process. This process historically included an initial response to threats, screening steps to assist in determining threat level, and indepth assessment to further aid in the development of supervision and action plans.

Best practices and continuous improvement in the district's threat assessment approach has been a primary goal since the draft of the first Threat Assessment Procedures Manual in 2002. A crucial component of preventing targeted violence at schools relies on developing positive school climates built on a culture of safety, respect, trust, and social and emotional support. Students in a safe and supportive learning environment feel empowered to share concerns with adults. Going forward, violence prevention across the district encompasses multidepartmental programs, initiatives, and campaigns which promote social-emotional competence as well as psychological and physical safety in schools. These include Sandy Hook Promise, social-emotional learning (SEL), Bullying Prevention, Silence Hurts, and Warning Signs: Safe Zone Listeners. The district's behavioral threat assessment procedures incorporate the most updated recommendations from the Florida Department of Education's Office of Safe Schools, and national leaders in threat assessment, such as the Federal Bureau of Investigation (FBI), the U.S. Secret Service, the Virginia Department of Criminal Justice Services (DCJS). Finally, the need for increased accountability has provided the impetus for developing an electronic database for the documentation and monitoring of threat assessments across the district, a new component of the district's process. With the goal of maintaining safe and secure schools, the Behavioral Threat Assessment (BTA) Procedures Manual 2022 Revision will outline and provide guidance to school and district staff on the most current threat assessment policies and procedures for Broward County Public Schools, Florida.

# CHAPTER 1: THE SCHOOL BOARD OF BROWARD COUNTY'S THREAT ASSESSMENT POLICY (SBBC 2130)

Behavioral Threat Assessment Policy (SBBC 2130) (§) was written in accordance with state legislation (9, 10), established research, and recognized standards of practice regarding threat assessment and management in school settings. The policy also provides guidance and important definitions to establish consistency and common language among district BTA team members.

#### **Definitions**

- A. A **threat** is communication or behavior that indicates that an individual poses a danger to the safety of school staff or students through acts of violence or other behavior that would cause harm to self or others.
  - a. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means.
  - b. The communication and/or behavior is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat; observed by or communicated to a third party, and regardless of whether the target of the threat is aware of the threat.
- B. A **behavioral threat assessment** is a systematic process that is designed to identify situations/persons of concern, investigate and gather information, and assess and manage the situation in order to mitigate risk.
- C. An **aberrant behavior** is that which is atypical for the person or situation and causes concern for the safety or well-being of those involved. Aberrant behavior for an individual involves actions, statements, communications or responses that are unusual for the person or situation; or actions which could lead to violence toward self or others; or are reasonably perceived as threatening or causing concern for the well-being of the person. These can include (but are not limited to):
  - a. Unusual social distancing or isolation of subjects from peers and family members;
  - b. Sullen or depressed behavior from an otherwise friendly and positive person;
  - c. Out of context outbursts of verbal or physical aggression;
  - d. Increased levels of agitation, frustration and anger;
  - e. Confrontational, accusatory, or blaming behavior;
  - f. An unusual interest in or fascination with weapons; and/or
  - g. Fixation on violence as means of addressing a grievance.
- D. An **imminent threat** exists when the person's behavior/situation poses a clear and immediate threat of violence toward self or others that requires containment and action to protect identified or identifiable target(s); and may also exhibit behavior that requires intervention.
- E. **Substantive threats** are behaviors or statements that represent a risk of harm to others. They are characterized by qualities that reflect serious intent (such as planning and preparation, recruitment of accomplices, and acquisition of a weapon) or the intent is not clear.
- F. **Transient threats** include all threats that do not reflect a genuine intent to harm. They are often made in the heat of the moment and may be an expression of humor, rhetoric, anger, or frustration that can be easily resolved with an apology, retraction, or explanation by the person who made the threat. Transient threats can be provocative and disruptive, but from a threat assessment perspective, they do not reflect a real intent to harm others.
- G. An **unfounded/no threat** decision exists when, following a detailed account of the threat obtained by interviewing the person who made the threat, the intended victim, and other witnesses, a threat could not be corroborated or substantiated. It may also exist when the determination is made, based on the circumstances and the student's intentions, that there is no evidence of communication or behavior suggesting an intent to harm.

H. A **behavioral threat assessment team** shall include, pursuant to Florida statute, persons with expertise in counseling, instruction, school administration, principal, when available, and law enforcement\*. Persons with expertise in counseling include school counselors, school psychologists, school social workers, and family counselors. Additional personnel with knowledge of the child or circumstances may also serve as members of the team.

\*In Broward County Public Schools, Armed Safe School Officers-Marshal/Guardians are not law enforcement officers. Therefore, they do not fulfill the law enforcement requirement.

#### **Key Highlights**

- ➤ All school-based administrators and threat assessment team members must attend and complete mandatory district behavioral threat assessment trainings annually. Members will be trained on the roles and responsibilities of each team member. Each mandatory team member shall report their completion of this requirement to their supervisor.
- ➤ The team must provide annual training and guidance to students, staff, and parents on recognizing behaviors of concern, the roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting.
- ➤ All SBBC employees, volunteers, and contractors are required to report to school administration any expressed threat(s) or behavior(s) that may represent a threat to the community, school, or self.
- ➤ Each school principal must assign school-based staff members who can proactively monitor and respond to all incoming reports where safety is of concern.
- Each threat assessment team **must respond, within 24 hours when school is in session**, to any report of a threat or any patterns of behavior that may pose a threat to self or others. If school is not in session, and the school principal becomes aware of a threat or a pattern of behavior by a student that may pose a threat to self or others, he/she shall immediately refer the matter to law enforcement for evaluation, and the threat assessment team must meet no later than the end of the first day school is back in session to consider the matter and ensure it is resolved.
- ➤ Behavioral threat assessment team members shall follow established procedures for referrals to school-based, community, and/or healthcare providers for mental health services, evaluation, or treatment.
- ➤ If an immediate mental health or substance abuse crisis is suspected, school personnel shall follow policies to engage behavioral health crisis resources, including, but not limited to, mobile crisis teams and school resources officers, who have been trained in crisis intervention.
- ➤ Where an immediate threat to life or physical safety exists, reports must result in an immediate notification to law enforcement.
- ➤ The threat assessment team must consult with law enforcement when a student exhibits a pattern of behavior, based upon previous acts, or the severity of an act, that would pose a threat to school safety.
- ➤ Upon a preliminary determination by the behavioral threat assessment team that an individual poses a threat, members of the behavioral threat assessment team may request and obtain criminal history record information. No member of the team shall redisclose or use such information beyond the purpose for which such disclosure was intended.
- ➤ Regardless of threat assessment activities, disciplinary action and referral to law enforcement are to occur as required by law and school board policies.

Please refer to SBBC Policy 2130 (8) for further information related to the key roles and responsibilities related to school-based Behavioral Threat Assessments.

# CHAPTER 2: THREAT ASSESSMENT BEST PRACTICES AND CONSIDERATIONS

The procedures detailed in this manual were developed in accordance with legislation and policies enacted by the State of Florida and the District, as well as nationally recognized standards of practice regarding threat assessment and management. This chapter outlines the essential framework for threat assessment teams to conduct behavioral threat assessments.

#### **Pathways to Violence**

The Behavioral Threat Assessment Center (BTAC), housed within the FBI's National Center for the Analysis of Violent Crime (NCAVC), is an international leader in threat assessment and management. Their publication, *Making Prevention a Reality: Identifying, Assessing, and Managing the Threat of Targeted Attacks*, provides an overview of scientific research on violence prevention and risk factors indicative of a potential for violence. Below is an overview of the research compiled by BTAC (1) on the pathways that lead a person of concern towards violence.

Most people learn to process and cope with negative experiences through healthy responses. Individuals most at risk for perpetrating targeted violence, however, are brittle, tending to obsess over injustices and are unable to withstand rejections or triggering events. Generally, the more stressors and triggers that exist in a person's life, the more difficult it becomes to cope. A stressor can be anything in the person of concern's life that causes tension or anxiety and can include:

- ➤ School/work-related failure or disappointment
- > An unhappy home environment
- > Financial distress
- Material, relational, or status losses in family, intimate/peer, occupational and self-image
- Potential future events, such as divorce, terminal illnesses, chronic pain/health issues

Years of research suggests that an individual on a path towards violence tends to cover a series of steps. However, pathways are not identical for every person of concern. The process may be linear through a certain sequence of steps or steps may be co-mingled. Time spent at each step may vary. Most often, deeply held grievances are the first step on the pathway to violence. Motivators can also include the need for revenge for a perceived injury or other grievance, quest for justice (as defined by offender), desire for notoriety or recognition, desire to solve a problem perceived to be unbearable, and/or a desire to kill or be killed.

Generally, an individual's pathway to violence may include the following:

- > Grievance (i.e., personal grievance or humiliation based upon real or imagined injustices)
- ➤ Ideation (i.e., idea that violence is an acceptable, or the only, means to achieve redress)
- Research and Planning (i.e., when, how, where, etc.)
- > Preparation (i.e., equipment, skills, resources)
- > Breach (i.e., circumvention of security measures at target location prior to attack)
- ➤ Attack (i.e., preplanned or opportunistically chosen targets)

#### **Risk Factors and Warning Behaviors**

Whether or not an individual has made a direct threat should not be a driving factor in the decision to proceed with threat assessment; waiting until direct threats are made can be a grave mistake. According to available research, most offenders do not necessarily make direct threats towards specific targets but rather display identifiable indicators of violent intent prior to perpetrating an attack. While an expression of intent to inflict harm is a clear identifier, a person who poses a threat may also be identified by an analysis of risk factors and other concerning warning behaviors that needs further exploration. *Risk factors* enhance the threat that someone may pose. These include but are not limited to:

- A history of violence (i.e., history of past violence, childhood exposure to violence, past involvement with law enforcement)
- ➤ Health/mental health factors (i.e., substance use, personality disturbance, severe mental illness, history of suicidality, organized behavior)
- Weapons (i.e., access/familiarity/fascination with firearms, stabbing instrument, explosives)
- ➤ Problematic behavioral history (i.e., history of stalking, harassing, threatening behavior, or non-compliant behavior)
- Lack of social/environmental positive supports (i.e., unhealthy support system, isolation, instability)

Predicting the exact occurrence or timing of an occurrence of violence is not possible. However, certain identifiable warning behaviors warrant particular attention in gauging whether an act of violence may occur. *Warning behaviors* are changes in patterns of behavior that suggest increasing or accelerating risk for violence. These can also help to assess the potential imminence of a violent event. Outward behavior should be regarded as a manifestation of someone's state of mind. When behaviors exhibited by the person of concern cause fear in others, people should take notice. Warning behaviors can include:

- Person of concern engages in research, planning, and/or preparation (e.g., researching/obtaining weapons, selecting potential targets, conducting a rehearsal, engaging in an attack).
- Fixation warning behaviors such as an increasing preoccupation with a person or cause.
- Fascination with violence and/or weapons, military or law enforcement paraphernalia, suggesting a warrior mentality and a desire to copycat previous attackers.
- Acts of aggression committed for the first time in an effort to test one's ability, such as animal cruelty, assault, firearm discharge, arson, vandalism, or rehearsed violence with inanimate objects.
- ➤ Leaked information to a third-party regarding thoughts, characterized by overt threats or by indirect expressions, can provide clues regarding an individuals' thoughts, feelings, or an intention to harm.
- > Implicit or explicit communications of a desire to do harm/kill.
- An approach or attempt to gain proximity to an intended target through trespassing, stalking, burglaries, or other criminal mischief, as escalation, pre-attack surveillance, or a final act of preparation.
- ➤ A burst of energy in would-be offenders, such as frequent trips, errands, purchases, or communications, has been noted to occur in the hours, days, or weeks prior to a targeted violence incident.
- > End of life planning or terminal behaviors that may indicate last resort thinking and a plan to end one's life in the near future.
- ➤ Other last resort behaviors can include communications or actions indicating increasing desperation or distress, such as indicating that time is running out, exhibiting drastic changes in appearance, or a sudden onset of reckless behaviors.
- > Sudden cessations of medications or other substance use or sudden withdrawal from typical life patterns or obligations can signal that a person is making final preparations for an attack.

#### **Mitigators**

*Mitigators* are protective factors that may prevent or inhibit a person of concern from thinking about or carrying out an act of targeted violence. Threat assessment teams should consider the following possible inhibiting factors:

- > Pursuit of non-violent, legally and socially sanctioned methods of conflict resolution
- > Sense of humor
- ➤ Positive, realistic future short and long-term goals
- Persons, things, or circumstances of sufficient value to the person that reduce the likelihood of violence
- > Supportive family (e.g., provides healthy structure/supervision)
- ➤ Healthy social supports (e.g., positive influences, religious affiliations, community group/club)
- Positive coping mechanisms (e.g., exercise, healthy interests, hobbies)
- Access and receptiveness to assistance (e.g., mental health, financial, medical)
- > "On the radar" for violence prevention (i.e., individual has been previously identified as a person of concern and is the focus of an effective support plan)

#### **Best Practices in Threat Assessment**

The goal of the threat assessment process is to be preventative, not punitive (12). For this reason, the procedures outlined in this manual are based on best practice guidelines in the prevention of violence and threat assessment. The *Comprehensive School Threat Assessment Guidelines* (CSTAG) incorporate recommendations made by the Secret Service's National Threat Assessment Center (NTAC) and the FBI's BTAC (3, 4). Furthermore, the Virginia Department of Criminal Justice Services (DCJS) and the Florida Department of Education (FLDOE) have provided model policies and procedures to help local school boards establish and operate threat assessment teams, developed using a synthesis of available research (5, 6, 12, 13). Collectively, these resources provide research-based guidance for school threat assessment teams in the identification and reporting of threatening behavior, the assessment process, and management of prevention and safety plans.

#### **Barriers to Engagement**

There are many barriers that teams may face to successful engagement in threat assessment, particularly during analysis of indicators of potential violence. Some of these barriers can include lack of knowledge regarding threat assessment policies and procedures, fatigue and desensitization of school-based teams, limitations to open communication among agencies, and misinformation regarding the impact of mental health factors (1). To overcome these barriers, a culture of shared responsibility in schools, workplaces, and other environments must empower bystanders witnessing warning behaviors to come forward to report concerns (1). This culture of shared responsibility is created by environments that foster positive connections and a sense of community. Safe school climates, which encourage positive, trusting relationships among classmates and their teachers and break down "codes of silence" are a crucial component of preventing targeted violence at schools (7).

#### **Research-Based Recommendations**

A multidisciplinary threat assessment team must be established within schools. This team should include a variety of disciplines within the school community, a specifically designated leader (e.g., principal or administrative designee), clear protocols and procedures, and regular opportunities for collaboration and meetings (7). The designated leader shall initiate an initial inquiry/triage upon receiving a threat report (13). The leader may

designate a subset of team members for additional data collection (13). Defined roles and responsibilities of team members during this process may include review of threatening behavior/communications, review of records, and conducting interviews (13). Determination of the seriousness of a threat shall be made expeditiously and in consultation with threat assessment team members (13). All team members should work collaboratively, communicate actively with each other, and have the opportunity to review cases to ensure concerns have been adequately addressed (13).

All threats should be taken seriously and thoroughly investigated to determine level of concern. Even threats made anonymously and/or through electronic communication should be assessed. It is critically important to gather as much information as possible. At times, information will simply not be available due to factors such as legal or logical impediments, but generally speaking there is often a great deal of information which can be accumulated in an effort to truly understand what is happening with a person of concern. Preliminary assessments can sometimes be offered pending development of additional information. Law enforcement should be notified immediately in the event of an imminent threat. Research on best practices (1, 3, 4, 7, 13) suggests the following as critical to successful threat assessment:

- The continuum of identifiable indicators of violent intent, or warning behaviors, should be well defined.
- ➤ Reporting mechanisms should be known, easy to understand and use, and ideally offer a variety of means to report threats, including anonymous reporting.
- > The school community should feel confident that reports will be taken seriously, kept confidential, and handled appropriately.
- ➤ Building rapport can facilitate information-gathering efforts. Threat assessment team members should demonstrate that their goal is to support individuals who may be struggling, while ensuring that the student and school are safe. When teams have established this rapport, parents or guardians may be more likely to share their own concerns, and the student may be more forthcoming about frustrations, needs, goals, or plans.
- > Documentation of reports made, information gathered, and intervention strategies taken should be maintained.
- ➤ Regular training for all stakeholders should take place, including faculty, staff, administrators, students, parents, and law enforcement.

Once a threat report has been received, BTA procedures should incorporate the following steps (1, 3, 4, 7, 13):

- ➤ Threat assessments should begin with collecting information from a variety of sources. This includes interviews with the student of concern, people familiar with the student, review of formal academic, disciplinary, or law enforcement records, and consideration of social media postings.
- > Second, information regarding risk factors, warning behaviors, and threat mitigators should be analyzed in the context of the student of concern's age and social/emotional development to determine credibility and seriousness of the threat.
- > Third, the team should respond to all substantive threats with protective actions, including protecting potential victims and implementing conflict resolution strategies.
- Fourth, the team should respond to all very serious substantive threats by determining the need for mental health services and counseling, law enforcement involvement, and a safety plan. Risk management for a student of concern should include a carefully planned, individualized intervention strategy, or a series of interventions, resources to assist the student, as well as some level of monitoring.

#### **Considerations for Determination of Risk Level**

Threat assessment is ultimately concerned with whether the student poses a threat, not whether the student has made a threat. Threat assessment must consider not only the student who makes the threat, but the total context of the threat. This includes the situation in which the threat was made and what the student intended by making the threat. Many times, a student will make a threatening statement without a substantive intent to harm anyone (4). In other words, any student can make a threat, but relatively few will engage in behavior that indicates the planning and preparation necessary to carry out the threat. Threat assessment aims to determine how serious the threat is and then what should be done about it (4).

The following definitions must be considered when BTA teams are making their risk level determinations:

- o *Unfounded/No Threat*: Following a threat assessment, the threat could not be corroborated or substantiated.
- o *Transient*: Threats where there is not a sustained intent to harm. Threat may have been made in the heat of the moment as an expression of anger, frustration, or humor.
- o *Serious Substantive*: Threat where the intent to harm is present and included a threat to hit or fight. There is at least some risk that the person will carry out the threat and requires protective action.
- Very Serious Substantive: Threat where the intent to harm is present and included a threat to kill, rape, shoot, or injure with a weapon. There is at least some risk that the person will carry out the threat and requires protective action.

Objective and multifaceted threat assessment is always necessary when a report is received because there is no demographic profile for a targeted violence offender (1,7). Behavioral threat assessment teams must consider the totality of risk factors, warning behaviors, stressors, precipitating events, and protective factors present in a person of concern's life. A person may be of particular concern due to individual qualities that include a unique combination of these factors. Once the team has gathered all available information, they can begin to assess level of risk. The team will determine whether a threat is *unfounded* or whether a student poses a *transient, serious substantive, or very serious substantive threat* of risk and recommend appropriate management strategies. Human judgement, applied to the totality of circumstances surrounding the threat, must drive the threat assessment team's ultimate decision on level of concern. The level of risk a student poses can change over time due to the evolving nature of warning behaviors, surrounding circumstances, and attempted interventions (1).

Distinguishing among unfounded/transient versus substantive threats is critical to the determination of appropriate responses to threat reports. *Transient threats* are threats that can be easily resolved and do not reflect a real intent to harm others. In a school setting, many transient threats are expressions of humor, anger, frustration or fear that can be disruptive but do not represent a serious concern. The person may retract the threat or offer an explanation and/or apology that indicates no future intent to harm. According to the CSTAG model, *substantive threats*, in contrast, reflect a serious intent to harm others (3, 4). These typically include warning behaviors such as planning and preparation, recruitment of accomplices, and acquisition of a weapon (3, 4). Since all substantive threats by definition are serious threats, the guidelines distinguish between threats that are *serious* versus *very serious* (3, 4). Even though a person could sustain a severe injury from any kind of assault, for threat assessment purposes the only substantive threats to be classified as *very serious* are those having the greatest risk of severe injury (3, 4). The classification of a *very serious substantive threat* is reserved for only the most serious and dangerous threat situations (3, 4). It is expected that a school would have few or no cases of *very serious substantive* threats each year (3, 4).

An additional consideration for threat assessment teams is that they may observe behavioral changes in the person of concern if he/she becomes aware of the threat assessment process. At times, when persons of concern become aware of the threat assessment process the following behavioral changes may be observed: deception, hiding behaviors, acceleration of their plan, or increased feelings of persecution. Sometimes threat management involves the recommendation for suspension or expulsion from school. When this is necessary, teams and school administrators should consider how it might affect their ability to monitor the student. Removing a student from school does not eliminate the risk to the school community. Teams should develop strategies to stay connected to the suspended or expelled student to determine whether the student's situation is deteriorating or if the behaviors of concern are escalating so that they can respond appropriately. Overall, looking at behavioral changes and their meaning is important. Therefore, the response to the intervention or support plan will likely require ongoing monitoring and revisions, as needed (1).

#### **Considerations for People with Disabilities**

Threat assessments must be conducted for all students (non-disabled students and students with disabilities). Threat assessment teams often have questions regarding whether a person's disability is contributing to their potential for violence. Most people with disabilities do not commit violent acts (1). However, the likelihood of violence is slightly greater for someone with a serious mental illness, particularly psychotic disorders, than for someone who is not so afflicted (1). Even if the beliefs articulated by a person of concern seem clearly delusional, it is important to assess how capable the person may be of acting out violently or how fixated the person is on resolving a grievance. Overall, threat assessment and threat management is an intertwined, dynamic process with mental disorder symptoms and diagnoses being several pieces in a larger puzzle (1).

Threat assessment must always be based on an individualized process (13). A determination that a person with a disability poses a direct threat should not be based on generalizations or stereotypes about the effects of a particular disability (13). Threat assessment teams should direct their attention to symptoms and behaviors, rather than formal diagnoses, for purposes of assessing violence concern (1). Students with emotional issues or developmental disorders may behave in a way that is maladaptive but might not be concerning or threatening because the behavior is a product of their diagnosis (7). Students with disabilities may lack an understanding of the consequences of their actions. Behaviors exhibited by a student with an identified disability need to be evaluated in the context of that diagnosis and the student's known baseline of behavior (7). When considering a serious mental illness, threat managers should assign a logical level of significance to it, based upon the nature of the observed symptoms, risk factors, and/or warning behaviors (1). If a student identified as having a disability exhibits maladaptive behaviors and/or behaviors of concern, the appropriate accommodations and/or services/interventions to address these behaviors must be documented in their educational plan (e.g., 504 Plan, IEP, FBA/PBIP).

Threat assessments may be intimidating for students, particularly those with special needs. When working with a person with a disability, it is important to use proper etiquette to interact most effectively, make the person feel comfortable, and obtain accurate information.

Below are some basic tips to follow (11):

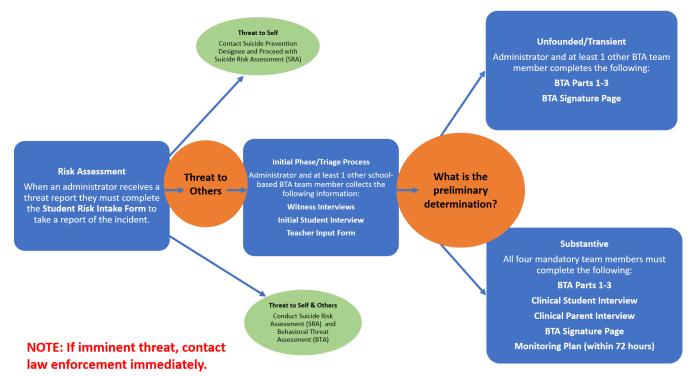
- > Utilize adults who are familiar with the student's unique needs and levels of functioning.
- > Stress, particularly for people with mental illness, can affect the person's ability to function. In a crisis, stay calm, supportive, and ask the person what will make them feel most comfortable.

- ➤ Consider the individual's sensory needs. It may be easier for the person to function in a quiet, small environment with soft lighting and without distractions.
- > Give the person your full attention. Do not interrupt them or finish their sentences. Be patient and allow the person to take their time.
- > Speak directly to, and make eye contact with, the person with a disability, not to their companion, aide, or sign language interpreter. Respect the person's manner of communication (e.g., sign language, written vs. oral, etc.) and allow for sufficient processing time.
- Rephrase, rather than repeat, sentences that the person does not understand.
- ➤ Gauge the pace, complexity, and vocabulary of your speech according to theirs.
- For people with developmental disabilities, speak in clear sentences, using simple words and concrete, rather than abstract, concepts. Break down complex ideas into smaller parts.
- ➤ People with developmental disabilities may be anxious to please and may tell you what they think you want to hear. Questions should be phrased in a neutral way to elicit accurate information. Verify responses by repeating each question in a different way.
- ➤ People with autism and other developmental disabilities often prefer predictable situations. It can be helpful to make sure plans and the interview agenda are concrete and presented in advance. Sudden changes and transitions may be difficult.
- Consider that the student may engage in some behaviors that may be interpreted as non-compliant but may be a product of the student's disability. Utilize strategies that typically work for the child in order to gain their cooperation

# CHAPTER 3: BEHAVIORAL THREAT ASSESSMENT (BTA) PROCEDURES

#### **Overview of BTA Procedures**

Broward School's BTA process involves: 1) gathering initial information about the incident, 2) collecting additional data through interviews and sources, 3) analysis and determination of risk level, and 4) creating a support and/or monitoring plan. The Initial Phase requires an administrator and at least one additional school-based team member to complete the <u>Triage Process</u>. The corresponding school's BTA team will use these procedures to evaluate the presence of factors that indicate whether violence might be a possibility and develop risk management strategies to reduce risk of violence. A completed BTA includes the following documents listed as



final within the EdPlan Documents tab:

- ✓ Student Risk Intake Form
- ✓ Initial Student Interview
- ✓ <u>Teacher Input Form</u>
- ✓ Witness Interview(s) (as applicable)
- ✓ Behavioral Threat Assessment (BTA Part 1, Part 2, Part 3), including Signature Page

- Clinical Student Interview \*
- ✓ <u>Clinical Parent Interview</u> \*
- ✓ Monitoring Plan \*\*

<sup>\*</sup>Required for Substantive threats; as needed for Unfounded/Transient threats.

#### **BTA PROCESS AT-A-GLANCE**

The BTA Process At-A-Glance is an overview of the entire BTA process. Please utilize the pages that follow (pgs. 19 to 42) for step-by-step guidance related to each section listed below.

#### **RISK ASSESSMENT**

|                 | Complete the <b>Student Risk Intake Form</b> for threats to self and/or others:  ☐ If the individual poses a threat of harm to others, follow BTA procedures below.  ☐ If the individual poses a threat of harm to self, refer to the Suicide Prevention Designee for the Suicide Risk Assessment (SRA) process.   |  |
|-----------------|--|--|
|                 | ☐ In either case, take <u>immediate action</u> for imminent threats.   |  |
|                 | INITIAL PHASE/TRIAGE PROCESS   |  |
|                 | Administrator and at least one other school-based BTA team member will conduct Initial Student Interview, Witness Interview(s), and gather Teacher Input Form(s) to make a <u>preliminary determination if threat level may be unfounded/transient or substantive</u> .  ☐ If the preliminary determination suggests that the threat is <b>unfounded/transient</b> , an administrator and at least 1 other team member complete the following <u>BTA process for unfounded/transient threats</u> : a) BTA Parts 1-3 and b) Signature Page.                                     |  |
|                 | ☐ If the preliminary determination suggests that the threat is <b>substantive</b> , all 4 mandatory team members must participate to complete the following <u>BTA process for substantive threats</u> : a) BTA Parts 1-3, b) Clinical Parent Interview, c) Clinical Student Interview, d) Signature Page, and e) Monitoring Plan. If at any point during the BTA process, data indicates that the threat may be substantive rather than unfounded/transient, all mandatory team members must participate and the <u>BTA process for substantive threats</u> must be followed. |  |
|                 | BTA PART 1: INCIDENT INFORMATION   |  |
|                 | <b>Incident Information</b> : Specific details about the incident, threat, and/or concern.   |  |
|                 | BTA PART 2: INTERVIEWS AND SOURCES   |  |
|                 | Interviews and Sources: Select all interview forms completed and indicate names of interviewee/interviewer and dates/time. Conduct additional clinical interviews* as needed.  Record Review: Review relevant records and specify person who reviewed the information.  Attached Sources: Upload/attach/store all relevant artifacts pertaining to the student's BTA.  |  |
|                 | BTA PART 3: ANALYSIS, RISK LEVEL, AND STUDENT SUPPORT PLAN   |  |
|                 | Analysis: Answer 18 key questions to analyze <u>risk factors</u> , <u>warning behaviors</u> , and <u>mitigating circumstances</u> (consider all information collected in the Initial Phase/Triage process and in BTA Part 1 and Part 2).  Observations Suggesting Need for Intervention: Use as needed for intervention planning.  Determination of Risk Level: Determine <u>risk level</u> based on all information collected.  Actions and Student Support Plan (SSP): Select mandatory and additional action steps.  Finalize BTA and upload the signature page.            |  |
| MONITORING PLAN |  |  |
|                 | Monitoring Plan*: For on-going monitoring of support/services.  *Required for Substantive threats; as needed for Unfounded/Transient threats.  |  |

#### **Risk Assessment**

The Student Risk Intake Form is to be utilized to document the initial report of concern. The Student Risk Intake Form is the beginning of the process and will always lead to either a Behavioral Threat Assessment (BTA) and/or Suicide Risk Assessment (SRA). It is completed by a school-based administrator using information from the individual(s) making the report. This form must be listed as a finalized document on the EdPlan Documents tab.

#### **Student Risk Intake Form**

Information About the Incident

| ☐ Today's Date   |     |
|--|-----|
| ☐ Who reported this initial concern?   |     |
| <ul> <li>Reporter Name</li> </ul>  |     |
| <ul> <li>Affiliation to School</li> </ul>  |     |
| <ul> <li>Contact Number</li> </ul>   |     |
| ☐ Who was this concern reported to?  |     |
| <ul> <li>Name of Individual</li> </ul>   |     |
| <ul> <li>Affiliation to School</li> </ul>  |     |
| <ul> <li>Contact Number</li> </ul>   |     |
| ☐ Date/ Reported   |     |
| ☐ Time Reported (if known)   |     |
| ☐ Date Administrator Learned of Incident   |     |
| ☐ DMS Incident Number (if applicable)  |     |
| ☐ Date/Time of Incident  |     |
| ☐ Location of Incident   |     |
| Narrative Details: Write a narrative below detailing the incident, threat to self, threat to others, and/or concerning behavior reported. Please include the location and time of the incident, threat, or concerning behavior. Determine if there are other individuals who witnessed the student engaging in threatening, aberrar or concerning behavior. Where threats were communicated, quote where possible, and use quotation marks to indicate direct quote. Attach original documentation, if available, later in the BTA and/or SRA processes. Primary Target(s): If a threat to others has been made, has the intended target been identified? Witness(es): If additional witnesses were identified by the reporter, please list them. Name of Witness What is their position/Affiliation to the school? Contact Number |     |
| <ul> <li>Incident Type(s) (Check all that apply):</li> <li>Threat to Others: If the individual is suspected of posing a threat of harm to others, begin the Trial Process, mobilize the necessary BTA team members, and initiate the BTA within 24 hours, starting we Part 1. If imminent threat is suspected, follow mandatory steps to respond to imminent threats toward others.</li> <li>Threat to Self: If the individual is suspected of posing a threat of harm to self, then ensure the stude is medically safe, maintain adult supervision, and contact a Suicide Designee or other mental health professional to conduct Suicide Risk Assessment (SRA) immediately. If imminent threat, follow</li> </ul>  | ith |
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mandatory steps to respond to imminent threats towards self. Please note: If it is a threat to self ONLY you DO NOT complete any components of the Behavioral Threat Assessment process. (2).

If **both** a threat to self and others is selected above, **both the BTA and SRA processes** must be completed. Each situation is unique and needs to be assessed to determine which process to follow first. If you require assistance, please contact the Psychological Services Department (754) 321-3440 for BTA assistance and the SEDNET Department (754) 321-3421 for SRA assistance.

#### **Mandatory Steps to Respond to Imminent Threats**

| If <u>imminent threat to others</u> is suspected, then contact law enforcement immediately. Document the name of |
|--|
| the law enforcement official contacted, date/time of contact, and outcome of contact. The following actions are  |
| also mandatory to respond to an imminent threat towards others:  |
| ☐ Utilize law enforcement to contain the threat and consult with the school safety team.                         |
| ☐ Take immediate precautions to protect potential victim(s).   |
| ☐ Initiate school safety plan procedures (e.g., Code Yellow, Code Red), if warranted.                            |
| ☐ Consult with SRO, as appropriate, to assist in monitoring/supervising the student of concern an                |
| determining the need for law enforcement action.   |
| ☐ Inform Principal or administrative designee of imminent threat. Principal will inform their supervisor.        |
| □ Notify parents of intended victim(s) before they leave school grounds.   |
| □ Notify parent of the person who poses the threat and attempt to enlist their support in preventing that        |
| student from carrying out the threat.  |
| ☐ If the student is on campus and significant mental health concerns are noted, consult with a mental healt      |
| professional and employ Baker Act procedures, if warranted.  |
| ☐ Complete and submit BCPS SIU Immediate Notification Form.  |
| ☐ Mobilize full threat assessment team.  |
| ☐ Follow discipline policy, as indicated.  |
| □ Notification to Law Enforcement: Complete ONLY when notifying law enforcement in cases of <u>imminent</u>      |
| threat to others.  |
|  |
| If <u>imminent threat to self</u> is suspected and if the student is on campus, follow Baker Act procedures      |
| immediately. If the student is not on campus, then contact law enforcement immediately. The following actions    |
| are also mandatory to respond to an imminent threat towards self:  |
| ☐ Ensure the student is medically safe first.  |
| ☐ Keep the student with an adult to provide supervision.   |
| ☐ Contact the Suicide Prevention Designee or another mental health professional.                                 |
| ☐ Contact the SRO, Local Law Enforcement or the Mobile Response Team (previously Youth Emergency                 |
| Services Team) at (954) 677-3113.  |
| ☐ Notify parent of the at-risk student and attempt to enlist their support in creating a safety and support      |
| plan.  |
| ☐ Schools should not contact the legal guardian to take the student off campus whether it is to their home       |
| or to a hospital.  |
| ☐ If a Baker Act Assessment was initiated, document the <b>name of the Baker Act Assessment Initiator</b> , the  |
| date/time initiated, and the outcome of the Baker Act Assessment if known.                                       |

#### **Initial Phase/Triage Process**

The initial phase of a behavioral threat assessment is to make a preliminary determination about the seriousness of a threat. When a threat is reported to an administrator, he/she and at least one other school-based BTA team member must gather information to make a <u>distinction between unfounded/transient and substantive threats</u>. It is important to note that threats lie on a continuum of severity, with the lowest level of threat being a figure of speech that does not convey a genuine intent to harm someone, to the highest level of threat that is a warning of impending violence. As a result, every threat may not require a meeting of the entire threat assessment team. Therefore, SBBC has adopted the triage process in accordance with the Office of Safe Schools.

When a report of a threat is received, <u>an administrator and at least one other school-based BTA team member</u> must evaluate the threat by obtaining a detailed account of the threat, usually by interviewing the person who made the threat, the intended victim, and other witnesses. During the Initial Phase/Triage Process, the Initial Student Interview, and any Witness Interview(s) should be completed, and teacher input should be obtained through the Teacher Input Form(s):

☐ *Initial Student Interview* (**Required**)

The Initial Student Interview must be completed by a school-based administrator. It is also recommended that a mental health professional be present during this interview. This document has been translated to multiple languages (Haitian-Creole, Portuguese, Spanish). Translated versions are available on EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

The interviewer must begin by attempting to establish rapport, then use these interview questions as a guide to interview the student who either made a threat or exhibited a behavior of concern. Consider the developmental level of the student and adjust the language of the questions accordingly. Use the questions as a guide to interview the person making the threat. Ask other questions as appropriate. Try to use open-ended questions rather than leading questions.

☐ *Teacher Input Form* (**Required**)

Information about a student of concern's behavior in a variety of settings is needed from each of his/her teachers. The information from the teacher(s) will be very helpful in developing a support plan for the student. The teacher(s) should answer the questions to the best of his/her knowledge, based on their own observations of the student.

☐ Witness Interview (Required if witnesses were identified in the gathering of information)

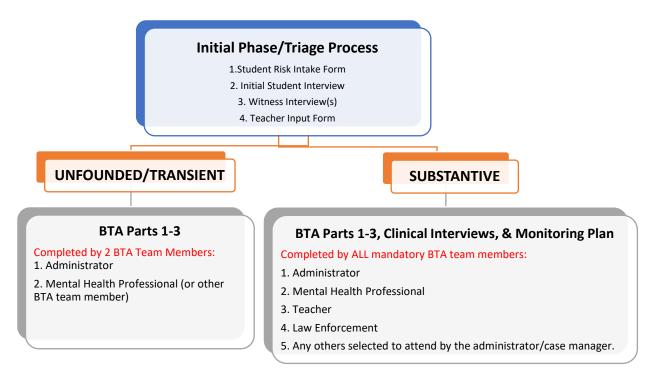
When applicable, Witness Interviews must be completed by a school-based administrator. A mental health professional may also be present during this interview.

The purpose of this interview is to gather information about the threat(s) or concerning behavior from potential victims or witnesses.

Interviews should be conducted in a confidential setting by the individuals listed below *only*. The participation of others, including law enforcement officers, is not recommended as this can impact rapport. Adequate rapport will lead to more appropriate supports for the student of concern.

The initial key question is whether there is a **communication or behavior that suggests an intent to harm someone**:

- o **If the answer is <u>no.</u>** and the preliminary determination by the BTA team members is that a student expressed a **unfounded/transient** threat, the administrator and the previously selected BTA team member(s) will proceed to complete the required portions of the <u>BTA process for a unfounded/transient threat</u>. The BTA team is responsible for assessing the level of threat by completing: a) BTA Parts 1-3 and b) BTA Signature Page. However, even if there is no intent to harm, statements or behaviors may still merit attention, intervention, or services, which can be determined by the BTA Team or the appropriate school-based team (e.g., Collaborative Problem-Solving (CPS) Team, Individualized Education Plan (IEP) team, etc.).
- o **If the answer is <u>yes</u>**, and the preliminary determination by the BTA team members is that a student poses a **substantive** threat to others, <u>all mandatory BTA team members</u> will proceed to complete the required portions of the <u>BTA process for a substantive threat</u>. The BTA team is responsible for assessing the level of threat by completing: a) BTA Parts 1-3, b) Clinical Parent Interview, c) Clinical Student Interview, d) Signature Page, and e) Monitoring Plan.



If at any point during the BTA process, there is any uncertainty that the threat may be unfounded/transient or the data indicate that the threat may be substantive rather than unfounded/transient, <u>all mandatory BTA team members</u> must participate and the <u>BTA process for substantive threats</u> must be followed.

Regardless of preliminary determination that a student poses a unfounded/transient or substantive threat to others at the triage phase, the BTA team should consider all information collected throughout the BTA process to make a final determination of risk level in Part 3 of the BTA. As a result of analysis throughout the BTA process, the final risk level indicated in Part 3 may not always reflect the preliminary determination.

#### **BTA Process: Unfounded/Transient Threat**

In addition to initial information obtained through the <u>Risk Assessment</u> and <u>Initial Phase/Triage Process</u>, if the preliminary determination suggests that the threat is **unfounded/transient**, an administrator and at least one other school-based BTA team member must complete the following: a) BTA Parts 1-3 and b) BTA Signature Page. Additional personnel with knowledge of the child or circumstances may also serve as members of the team (§).

BTA team members who have been threatened should serve as a witness and source of information (e.g., Witness Interview, Teacher Input Form), but should not serve as a BTA team member to avoid conflict of interest issues and potential loss of objectivity. If possible, an alternate team member should be appointed to fill the role of the threatened BTA team member.

If at any point during the BTA process, data indicate that the threat may be substantive rather than unfounded/transient, <u>all mandatory BTA team members</u> must participate and the <u>BTA process for substantive threats</u> must be followed.

#### **BTA Part 1**

Part 1 documents more specific details regarding the incident and/or threat report and any immediate actions taken when an imminent threat has been identified. Prior to completing BTA Part 1 on EdPlan, ensure that the core BTA team has been set-up in EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

In each of the sections below within BTA Part 1, proceed with documenting any details of the incident beyond what has auto-populated from the Student Risk Intake Form:

| _<br>_  | Information about the Incident<br>Sources<br>Details  |
|---------|---|
| Additio | onal required information:  |
|         | What was the <b>context</b> of the behavior? What was happening at the time and/or just before?   |
|         | ninent threat to others is suspected, then contact law enforcement immediately and follow atory action steps to respond to imminent threat.   |
|         | Was law enforcement required to be contacted? Document the name of the law enforcement official contacted, date/time of contact, and outcome of contact. Complete ONLY when notifying law enforcement in cases of <u>imminent</u> threat to others.  Mobilize the threat assessment team and complete <u>all required components of a BTA for substantive</u> |
|         | threat.   |

Regardless of law enforcement action, the threat assessment team must gather relevant information and initiate the BTA within 24 hours of the administrator receiving the initial report. Ideally, the Initial Student Interview should be conducted right away, so that if the threat is substantive, action can be taken promptly to prevent the threat from being carried out. However, in some cases it may not be possible to conduct an immediate interview – for example, if the threat was not reported until hours or days after it occurred or if the student is no longer on BTA Procedures Manual 2020 Revision (3/8/2022)

school premises. If it is not possible to interview the student right away, the team should gather information that is immediately available (perhaps by interviewing witnesses to the threat and/or reviewing available educational records) and decide on a reasonable, provisional course of action that emphasizes safety of anyone targeted by the threat. However, in most cases a team member will interview the student at the first opportunity in order to conduct a more complete assessment. If there are extenuating circumstances that delay access to the student or parent to complete the required interviews, the team should note the reason for delay on the EDPlan Info>Contacts Tab in EdPlan (e.g., attempts to contact parent/student and why either one was unavailable). Once all required components are completed, the BTA documents must be listed as finalized documents on the EdPlan Documents tab. If school is not in session, and the school principal becomes aware of a threat, he/she shall immediately refer the matter to law enforcement for evaluation, and the threat assessment team must meet **no later than the end of the first day school is back in session** to consider the matter and ensure it is resolved (8).

#### **BTA Part 2**

In Part 2, data collection <u>roles and responsibilities</u> are assigned each team member (e.g., Who will conduct interviews? Who will review records? Who will collect artifacts?).

Please refer to <u>BTA Process: Unfounded/Transient Threat</u> for a description of the mandatory team members for a unfounded/transient threat. If additional team members participate, add any additional team members to the student's BTA team (Refer to EdPlan Main Menu> Resource Information> BTA). If at any point during the BTA process, data indicate that the threat may be substantive rather than unfounded/transient, <u>all mandatory BTA team members</u> must participate and the <u>BTA process for substantive threats</u> must be followed.

#### Interviews and Sources

□ Please indicate names of individual(s) interviewed throughout the BTA process, name of the interviewer(s), and date/time of interview(s).

If student and/or parent is unavailable for interviews, please indicate and document on EDPlan Info > Contacts tab all attempts to conduct the required interview(s). Specify name of interviewer and date of interview attempted. If after multiple attempts have been made to complete the interview(s), and these unsuccessful attempts have been documented in the Contacts tab, create and finalize the corresponding interview document(s) with a note indicating why it could not be completed.

#### Interview Documents

Interviews are to be entered into EdPlan and *individually listed as finalized documents on the EdPlan Documents tab*. If printed interview forms are utilized (APPENDIX C through G), the information must be entered or uploaded as an attached source (Click on + sign next to the corresponding "Interviewee Name/Interviewed By" row within Interviews and Sources above) into EdPlan. Within the Interview Documents section in EdPlan, the checkbox for all applicable interviews must be selected prior to finalizing BTA Part 2.

Please select all required interviews completed during the <u>Initial Phase/Triage Process</u>: Initial Student Interview, Teacher Input Form(s), Witness Interview(s). Clinical interviews are not required for Unfounded/Transient threats but can be conducted if the BTA team determines there is a need to do so. If applicable, the <u>Clinical Parent Interview</u> and <u>Clinical Student Interview</u> that apply to the current BTA should also be selected.

Interviews should be conducted in a confidential setting by the individuals listed below *only*. The participation of others, including law enforcement officers, is not recommended as this can impact rapport. Adequate rapport will lead to more appropriate supports for the student of concern.

#### Records Review

Complete a review of relevant records (i.e., cumulative file, BASIS, EdPlan, Pinnacle, TERMS, Acceliplan, FSSP, etc.) and summarize any information relevant to the threat assessment process. The FSSP is an additional tool that allows threat assessment teams access to information from a variety of data sources that can assist in evaluating the seriousness of a reported or identified threat. Use of the FSSP should be determined on a case-by-case basis, but is not likely needed in all cases, especially where the threat is transient. Once the record review is completed, attach any additional relevant artifacts pertaining to the student's BTA. Specify the name of reviewer and job title for each section.

If applicable records are available from a previous BTA, these can be copied by clicking on the "Copy From Previous" button. New information shall be added if available.

| Required:  |
|--|
| <ul> <li>□ Behavioral/Discipline History</li> <li>□ ESE, 504, and/or Gifted History</li> <li>□ Academic/Attendance History</li> </ul>  |
| Other, if applicable (i.e., records indicative of <u>risk factors</u> , warning <u>behaviors</u> , or <u>mitigating factors</u> ):   |
| <ul> <li>□ Records from Outside Agencies</li> <li>□ Law Enforcement Records</li> <li>□ Employment Records</li> <li>□ Classwork/Homework Assignments</li> <li>□ Journal/Artwork</li> <li>□ Social Media</li> <li>□ Other Relevant Sources of Information (i.e., original written communication of threats, witness statemen referenced in Part 1, photos, documents, etc.)</li> </ul> |
| Following a records review, the team must answer the following question:   |
| ☐ Has the student previously exhibited behaviors of concern or posed a threat?   |

#### **BTA Part 3**

When assessing a potential threat or concerning behavior, the threat assessment team must determine not only whether a threat has been made or communicated, but also if a person poses a danger to self or others or if they are potentially on a <u>pathway to violence</u>. The threat assessment team must coordinate resources to provide intervention to individuals whose behavior may pose a threat to the safety of school staff or students. The threat assessment team must plan for the implementation and monitoring of appropriate interventions in order to manage or mitigate the student's risk for engaging in violence and increasing the likelihood of positive outcomes.

Interventions should remain in place until the team assesses that the student is no longer in need of supports and does not pose a threat to self or others (8).

Assemble all <u>mandatory BTA team members</u> to collaboratively analyze available data, determine final level of risk, and develop appropriate interventions. If at any point during the BTA process, data indicate that the threat may be substantive rather than unfounded/transient, <u>all mandatory BTA team members</u> must participate and the <u>BTA process for substantive threats</u> must be followed.

The BTA document must be finalized at the end of Part 3 and then acknowledged by the principal and by the cadre directors for accountability. See <u>Finalize BTA</u> and <u>Signature Page</u> sections for more information. *Analysis* 

Answer 18 key questions to analyze potential <u>risk factors</u>, <u>warning behaviors</u> and <u>mitigating circumstances</u>. These items can help better assess whether a threat is unfounded/transient or substantive but must be considered in the broader context of the situation and other known facts. Regard these items as a checklist to make sure you have considered these aspects of the threat, but they are not to be summed or used as a score. **Consider all information collected** during the <u>Initial Phase/Triage Process</u> and in BTA Part 1 and Part 2.

If more information is needed to answer the questions below, a **Clinical Student and/or Clinical Parent Interview** (<u>Interview Documents</u>) **should be conducted by a mental health professional**. The presence of law enforcement is not recommended during clinical interviews.

- ☐ Threat is Likely to be Less Serious:
  - 1. Subject admits to threat (statement or behavior).
  - 2. Subject has explanation for threat as benign (such as a joke or figure of speech).
  - 3. Subjects admits to feeling angry toward target at time of incident.
  - 4. Subject retracts threat or denies intent to harm.
  - 5. Subject apologetic or willing to make amends for threat.
  - 6. Subject willing to resolve threat through conflict resolution or some other means.
- ☐ Threat is Likely to be More Serious:
  - 7. Subject continues to feel angry toward target.
  - 8. Subject expressed threat on more than one occasion.
  - 9. Subject has specific plan for carrying out the threat.
  - 10. Subject engaged in preparation for carrying out the threat.
  - 11. Subject has prior conflict with target or other motive.
  - 12. Subject is suicidal (Complete suicide assessment).
  - 13. Threat involved use to a weapon other than a firearm, such as a knife or club.
  - 14. Threat involves use of a firearm.
  - 15. Subject has possession of, or ready access to, a firearm.
  - 16. Subject has or sought accomplices or audience for carrying out threat.
  - 17. Threat involves gang conflict.
  - 18. Threat involves peers or others who have encouraged subject in making threat.
  - 19. Comments/Other Relevant Observations.

#### Observations Suggesting Need for Intervention

Observations Suggesting Need for Intervention can be used as needed for intervention planning. Here are some factors to consider in identifying possible interventions to assist the subject and reduce risk. These items are not summed or scored:

- 1. History of physical violence.
- 2. History of criminal acts.
- 3. Preoccupation with violence, violent individuals, or groups that advocate violence.
- 4. Preoccupation with mass shootings or infamous violent incidents.
- 5. History of intense anger or resentment.
- 6. Has grievance or feels treated unfairly.
- 7. Feels abused, harassed, or bullied.
- 8. History of self-injury or suicide ideation or attempts.
- 9. Has been seriously depressed.
- 10. Experienced serious stressful events or conditions.
- 11. Substance abuse history.
- 12. History of serious mental illness (symptoms such as delusions or hallucinations).
- 13. Qualifies for exceptional education services or 504 plan.
- 14. Prescribed psychotropic medication.
- 15. Substantial decline in level of academic or psychosocial adjustment.
- 16. Lacks positive relationships with one or more school staff.
- 17. Family involvement.
- 18. Lacks positive relationships with peers.
- 19. Other factors that suggest need for intervention.
- 20. Comments/Other Relevant Observations.

#### Determination of Risk Level

Does the individual pose a threat of targeted violence toward one or more individuals? Thoughtful consideration of the answers to the above key questions will produce a sound foundation for the determination of risk level. When making a determination between unfounded/transient and substantive threats, take into account whether or not the individual is exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the plan. If there is doubt or if the threat cannot clearly be categorized as unfounded/transient, threats should be treated as substantive.

Regardless of preliminary determination that a student poses a unfounded/transient or substantive threat to others, the BTA team should consider all information collected throughout the BTA process to make this final determination of risk level. As a result of data-collection and analysis during the BTA process, the final risk level indicated in Part 3 may not always reflect the preliminary determination made at the <a href="Initial Phase/Triage Process">Initial Phase/Triage Process</a>. If at any point during the BTA process, data indicates that the threat may be substantive rather than unfounded/transient, all mandatory BTA team members must participate and the <a href="BTA process for substantive threats">BTA process for substantive threats</a> must be followed.

| BTA team make its final determination of risk level:   |
|--|
| ☐ <i>Unfounded/No Threat</i> : Following a threat assessment, the threat could not be corroborated or substantiated.   |
| ☐ <i>Transient</i> : Threats where there is not a sustained intent to harm. Threat may have been made in the heat of the moment as an expression of anger, frustration, or humor.  |
| ☐ Serious Substantive*: Threat where the intent to harm is present and included a threat to hit or fight. There is at least some risk that the person will carry out the threat and requires protective action.  |
| ☐ Very Serious Substantive*: Threat where the intent to harm is present and included a threat to kill, rape, shoot, or injure with a weapon. There is at least some risk that the person will carry out the threat and requires protective action.   |
| * Please note that for <i>Serious Substantive/Very Serious Substantive</i> threats, Clinical Parent and Clinical Student Interviews ( <u>Interview Documents</u> ) must be conducted to assist with developing the Student Support Plan (SSP). <i>Basis for Determination Statement</i>  |
| Threat assessment teams must consider the totality of risk factors, warning behaviors, stressors, precipitating events, and protective factors present. This should be analyzed in the context of the student of concern's age and social/emotional development to determine credibility and seriousness of the threat. Distinguishing between unfounded/transient versus substantive threats is critical to the determination of appropriate responses. As a reminder, substantive threats are behaviors or statements that represent a risk of harm to others and are characterized by qualities that reflect a serious intent to do harm. |
| Parent Notification  |
| Please be advised that while parental consent is not required when conducting a threat assessment, parent notification is required. Parent notification is required at this phase if not already contacted for <u>imminent threat</u> or clinical interviews completed for <u>Analysis</u> . Document the date, time, and name of the parent, and the outcome of the notification. Parents should be informed of the nature of the threat, who was threatened, and the consequences for the student if the threat is carried out. Enlist parental support and assistance in preventing the student from carrying out the threat.             |
| Actions  |
| Once the final level of risk has been determined, the BTA team will follow the mandatory actions that correspond to that level of risk identified. Identify which individual is responsible for each mandatory action step:  |
| <ul> <li>Unfounded/No Threat</li> <li>Contact student's parents and/or guardian.</li> <li>Additional responses, as determined by the threat assessment team.</li> </ul>  |

Please see Considerations for Determination of Risk Level section for more guidance and information to help the

#### ☐ Transient

- o Contact student's parents and/or guardian.
- o See that threat is resolved through explanation, apology, or making amends.
- o Follow discipline procedures as per policies 5.8 and 5006, if applicable.
- o Additional responses, as determined by the threat assessment team.

#### ☐ Serious Substantive

- o Contact student's parents and/or guardian.
- o Provide direct supervision of student until parents and/or guardians assume control.
- o Caution the student about the consequences of carrying out the threat.
- o Conduct Clinical Parent Interview.
- o Conduct Clinical Student Interview.
- Consult with SRO to assist in monitoring/supervising the student and determining need for law enforcement action. Document the name of the person who consulted with law enforcement, date, and the title of contact.
- Screen the student for mental health services and counseling and refer the student for school-based or community-based services as needed.
- Refer to CPS Team to determine need for academic/behavioral intervention and/or the need for psychological evaluation.
- o Develop a Monitoring Plan to include a Safety Plan within 72 hours.
- Assign team member(s) to monitor student and status of intervention(s).
- o Follow discipline procedures as per policies 5.8 and 5006.

### ☐ Very Serious Substantive

- o Caution the student about the consequences of carrying out the threat.
- o If the intended target is a student, notify the intended target(s)'s parents and/or guardians. If the intended target is an adult, notify the intended target(s).
- o Contact student's parents and/or guardian.
- o Provide direct supervision of student until parent and/or guardian(s) assume control.
- o Conduct Clinical Parent Interview.
- o Conduct Clinical Student Interview.
- Screen the student for mental health services and counseling and refer the student for school-based or community-based services as needed.
- Refer to CPS Team to determine need for academic/behavioral intervention and/or the need for psychological evaluation.
- Consult with SRO to assist in monitoring/supervising the student and determining need for law enforcement action. Document the name of the person who consulted with law enforcement, date, and the title of contact.
- o Develop a Monitoring Plan to include a Safety Plan within 72 hours.
- Assign team member(s) to monitor student and status of intervention(s).
- o Follow discipline procedures as per policies 5.8 and 5006.
- o If the threat assessment records were shared with Law Enforcement, please complete the FERPA log and contact the Privacy Officer if clarification is needed.

### Action Steps & Support Plan

In addition to the mandatory action steps, the team will identify responses that can help support this student and make positive outcomes more likely. The actions selected will comprise the Student Support Plan (SSP). The resources and supports the student needs will differ depending on the information gathered during the assessment. Supports can range from holding a parent conference to creating a safety plan for the student. Some actions may need to be taken immediately (e.g., safety plan) while others (e.g., IEP meetings) may need to occur at a later time. For assistance, please use the Observations Suggesting Need for Intervention within Part 3 Analysis to help you team determine possible interventions to assist the student to reduce risk.

Review all actions (mandatory and additional) with individuals who did not participate in the threat assessment who work with the student.

#### Notify Law Enforcement

☐ Was law enforcement contacted due to <u>imminent threat?</u> Complete ONLY when notifying law enforcement in cases of <u>imminent</u> threat to others.

## Meeting Participants

☐ Identify the name and title of each of the BTA mandatory team members and any additional team members who participated in the threat assessment. Mandatory team members must be added to the school's core team and any additional team members must be added to the student's BTA team (Refer to EdPlan Main Menu> Resource Information> BTA).

Reminder: If the preliminary determination suggests that the threat is **unfounded/transient**, an administrator and at least one other school based BTA team member can proceed with the BTA process. You may also add additional team members as needed. If at any point during the BTA process, data indicate that the threat may be substantive rather than unfounded/transient, all mandatory BTA team members must participate and the BTA process for substantive threats must be followed. For **substantive** threats, threat assessment team shall include persons with expertise in counseling, instruction, school administration, principal, when available, and law enforcement. Persons with expertise in counseling include school counselors, school psychologists, school social workers, and family counselors. Additional personnel with knowledge of the child or circumstances may also serve as additional members of the team (8). BTA team members who have been threatened should serve as a witness and source of information (e.g., Witness Interview, Teacher Input Form), but should not serve as a BTA team member to avoid conflict of interest issues and potential loss of objectivity. If possible, an alternate team member should be appointed to fill the role of the threatened BTA team member.

#### Finalize BTA

Select COMPLETE THREAT ASSESSMENT once the BTA team has completed Parts 1 through 3 and all required interviews and forms for the BTA process. *Please note: Finalizing this document will send alerts to the predetermined individuals for notification (i.e., School Principal).* 

➤ Once a BTA document has been finalized, the school principal must acknowledge the finalized BTA within approximately 48 hours by clicking the Acknowledge Threat Assessment button in Part 3 of the BTA.

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➤ Once the principal acknowledges the BTA, Cadre Directors will be emailed an alert to Acknowledge.

Along with the electronic record in EdPlan, completed threat assessments must be documented in TERMS. *The TERMS Intervention code must be assigned to the lead administrator's 3-digit contact code, which is assigned through a school-level IMT.* The lead administrator for the BTA will enter the TERMS L-Panel code that corresponds with the determined final risk level:

- > 220- Schl Safety **Unfounded**
- > 221- Schl Safety **Transient**
- > 222- Schl Safety Serious Substantive
- > 223- Schl Safety Very Serious Substantive

## **Signature Page**

Print the final page of the BTA from the student's Documents tab. All required team members must confirm their participation by signing the form and indicating they participated in-person, virtual format (i.e., Zoom/Teams), via telephone, etc.

- ➤ If the final determination is that the threat is **unfounded/transient**, signatures for the administrator and at least one other school based BTA team member are required. If additional team members participated, their signatures are also required. For unfounded/transient threats, the case manager must select "Transient-Not Required" for the core BTA team members that were not required and did not participate in the BTA.
- ➤ If the final determination is that the threat is **substantive**, signatures for all four mandatory team members are required. If additional team members participated, their signatures are also required.

Upload the scanned signature page to the Documents tab for the student. On the Documents tab for the student, you will click 'Upload External Attachments', select the scanned signature page from your computer, and then select the Behavioral Threat Assessment document that it applies to (Refer to EdPlan Main Menu> Resource Information> BTA).

## For unfounded/transient risk levels, the team may create a corresponding Monitoring Plan if needed.

The Monitoring Plan is for on-going monitoring of support/services. The level of supervision provided to the student should be consistent with the nature and seriousness of the threat. Through the Monitoring Plan, the team identifies any actions that require continued implementation and monitoring. This includes any further actions to be taken with the student who made the threat or displayed concerning behavior. The team will also identify any actions to be taken with potential victims of the threat and/or any students impacted by the threat. The Monitoring Plan can also include documentation of any disciplinary actions taken, if applicable.

#### **BTA Process: Substantive Threat**

In addition to initial information obtained through the <u>Risk Assessment</u> and <u>Initial Phase/Triage Process</u>, if the preliminary determination suggests that the threat is **substantive**, all mandatory BTA team members must participate to complete the following: a) BTA Parts 1-3, b) Clinical Parent Interview, c) Clinical Student Interview, d) Signature Page, and e) Monitoring Plan.

The school-based administrator must assemble the mandatory core members of the threat assessment team. The threat assessment team shall include persons with expertise in counseling, instruction, school administration, principal, when available, and law enforcement\*. Persons with expertise in counseling include school counselors, school psychologists, school social workers, and family counselors. Additional personnel with knowledge of the child or circumstances may also serve as members of the team (§). BTA team members who have been threatened should serve as a witness and source of information (e.g., Witness Interview, Teacher Input Form), but should not serve as a BTA team member to avoid conflict of interest issues and possible interference with objectivity. If possible, an alternate team member should be appointed to fill the role of the threatened BTA team member.

\*In Broward County Public Schools, Armed Safe School Officers-Marshal/Guardians are not law enforcement officers. Therefore, they do not fulfill the law enforcement requirement.

#### **BTA Part 1**

Part 1 documents more specific details regarding the incident and/or threat report and any immediate actions taken when an imminent threat has been identified. Prior to completing BTA Part 1 on EdPlan, ensure that the core BTA team has been set-up in EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

In each of the sections below within BTA Part 1, proceed with documenting any details of the incident beyond what has auto-populated from the <u>Student Risk Intake Form</u>:

|        | Information about the Incident  |
|--------|---|
| ш      | Sources   |
|        | Details   |
| Additi | onal required information:  |
|        | What was the <b>context</b> of the behavior? What was happening at the time and/or just before?   |
|        | ninent threat to others is suspected, then contact law enforcement immediately and follow   |
| manu   | atory action steps to respond to imminent threat.   |
|        | Was law enforcement required to be contacted? Document the name of the law enforcement official contacted, date/time of contact, and outcome of contact. Complete ONLY when notifying law enforcement in cases of <u>imminent</u> threat to others. |
|        | Mobilize the threat assessment team and complete <u>all required components of a BTA for substantive</u> threat.  |

Regardless of law enforcement action, the threat assessment team must gather relevant information and initiate the BTA within 24 hours of the administrator receiving the initial report. Ideally, the Initial Student Interview

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should be conducted right away, so that if the threat is substantive, action can be taken promptly to prevent the threat from being carried out. However, in some cases it may not be possible to conduct an immediate interview – for example, if the threat was not reported until hours or days after it occurred or if the student is no longer on school premises. If it is not possible to interview the student right away, the team should gather information that is immediately available (perhaps by interviewing witnesses to the threat and/or reviewing available educational records) and decide on a reasonable, provisional course of action that emphasizes safety of anyone targeted by the threat. However, in most cases a team member will interview the student at the first opportunity in order to conduct a more complete assessment. If there are extenuating circumstances that delay access to the student or parent to complete the required interviews, the team should note the reason for delay on the EDPlan Info>Contacts Tab in EdPlan (e.g., attempts to contact parent/student and why either one was unavailable). Once all required components are completed, the BTA documents must be listed as finalized documents on the EdPlan Documents tab.

If school is not in session, and the school principal becomes aware of a threat, he/she shall immediately refer the matter to law enforcement for evaluation, and the threat assessment team must meet **no later than the end of the first day school is back in session** to consider the matter and ensure it is resolved (8).

#### **BTA Part 2**

In Part 2, data collection <u>roles and responsibilities</u> are assigned to each team member (e.g., Who will conduct interviews? Who will review records? Who will collect artifacts?). Please refer to <u>BTA Process: Substantive Threat</u> for a description of the mandatory team members for a substantive threat. Add any additional team members to the student's BTA team (Refer to EdPlan Main Menu> Resource Information> BTA).

#### Interviews and Sources

□ Please indicate names of individual(s) interviewed throughout the BTA process, name of the interviewer(s), and date/time of interview(s).

If student and/or parent is unavailable for interviews, please indicate and document on EDPlan Info > Contacts tab all attempts to conduct the required interview(s). Specify name of interviewer and date of interview attempted. If after multiple attempts have been made to complete the interview(s), and these unsuccessful attempts have been documented in the Contacts tab, create and finalize the corresponding interview document(s) with a note indicating why it could not be completed.

#### Interview Documents

Interviews are to be entered into EdPlan and *individually listed as finalized documents on the EdPlan Documents tab*. If printed interview forms are utilized (<u>APPENDIX C through G</u>), the information must be entered or uploaded as an attached source (Click on + sign next to the corresponding "Interviewee Name/Interviewed By" row within Interviews and Sources above) into EdPlan. Within the Interview Documents section in EdPlan, the checkbox for all applicable interviews must be selected prior to finalizing BTA Part 2.

Please select all required interviews completed during the <u>Initial Phase/Triage Process</u>: Initial Student Interview, Teacher Input Form(s), Witness Interview(s). **Clinical interviews are also required for all substantive threats:** 

☐ Clinical Parent Interview (Required for Substantive threats; as needed for Unfounded/Transient threats)

The Clinical Parent Interview must be completed by a mental health professional with a parent/guardian. Mental health professionals have the necessary clinical knowledge regarding mental health conditions that impact behavioral and emotional functioning. An additional school staff member may participate, if warranted. The presence of law enforcement is not recommended during clinical interviews. This interview is also recommended if more information is needed to answer the 18 key analysis questions in BTA Part 3. This document has been translated to multiple languages (Haitian-Creole, Portuguese, Spanish). Translated versions are available on EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

The interviewer should make every effort to establish rapport and engage the parent as an ally. Explain to the parent that the purpose of the interview is to help their child be safe and successful at school. Please use the Clinical Parent Interview as a guide to interview the parent/guardian and try to use open-ended questions rather than leading questions. As follow-up questions, as appropriate. Understandably, parents may feel apprehensive, guilty, or defensive when being interviewed about their child's behavior. It is important that the interviewer find ways to convey respect for the parent, starting from the initial contact and throughout the interview. Also, it should be evident that the interviewer is interested in understanding and helping the parent's child; otherwise, the parent may regard the interview as an investigation designed to uncover evidence of wrongdoing by the student or incompetence by the parent. Overall, the interviewer should make every effort to engage the parent as an ally. Emphasize the common goal of helping their child to be safe and successful in school.

☐ Clinical Student Interview (Required for Substantive threats; as needed for Unfounded/Transient threats)

The Clinical Student Interview must be completed by a mental health professional with a student. Mental health professionals have the necessary clinical knowledge regarding mental health conditions that impact behavioral and emotional functioning. An additional school staff member may participate, if warranted. The presence of law enforcement is not recommended during clinical interviews. This interview is also recommended if more information is needed to answer the 18 key analysis questions in BTA Part 3. This document has been translated to multiple languages (Haitian-Creole, Portuguese, Spanish). Translated versions are available on EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

The purpose of the Clinical Student Interview is to maintain the safety and well-being of the student and others. Therefore, this interview has two objectives:

- 1) Intervention and/or referral needs. Assess the student's present mental state and determine whether there are urgent mental health needs that require attention, such as risk of suicide, homicide, psychosis, or rage. Beyond these immediate needs, consider whether there are other referral or support needs.
- 2) **Threat reduction.** Gather information on the student's motives and intentions in making the threat in order to understand why the threat was made and identify relevant strategies or interventions that have the potential to reduce the risk of violence.

The interviewer must begin by attempting to establish rapport, then use these interview questions as a guide to interview the student who either made a threat or exhibited a behavior of concern. Try to use open-ended questions

rather than leading questions. Consider the developmental level of the student and adjust the language of the questions accordingly. Ask follow-up questions, as appropriate.

Interviews should be conducted in a confidential setting by the individuals listed below *only*. The participation of others, including law enforcement officers, is not recommended as this can impact rapport. Adequate rapport will lead to more appropriate supports for the student of concern.

#### Records Review

Complete a review of relevant records (i.e., cumulative file, BASIS, EdPlan, Pinnacle, TERMS, Acceliplan, etc.) and summarize any information relevant to the threat assessment process. Attach any additional relevant artifacts pertaining to the student's BTA. Specify the name of reviewer and job title for each section. If applicable records are available from a previous BTA, these can be copied by clicking on the "Copy From Previous" button. New information shall be added if available.

| Required:  |    |
|--|----|
| <ul> <li>□ Behavioral/Discipline History</li> <li>□ ESE, 504, and/or Gifted History</li> <li>□ Academic/Attendance History</li> </ul>  |    |
| Other, if applicable (i.e., records indicative of <u>risk factors</u> , warning <u>behaviors</u> , or <u>mitigating factors</u> ):   |    |
| <ul> <li>□ Records from Outside Agencies</li> <li>□ Law Enforcement Records</li> <li>□ Employment Records</li> <li>□ Classwork/Homework Assignments</li> <li>□ Journal/Artwork</li> <li>□ Social Media</li> <li>□ Other Relevant Sources of Information (i.e., original written communication of threats, witness statemer referenced in Part 1, photos, documents, etc.)</li> </ul> | nt |
| Following a records review, the team must answer the following question:   |    |
| ☐ Has the student previously exhibited behaviors of concern or posed a threat?   |    |

#### **BTA Part 3**

When assessing a potential threat or concerning behavior, the threat assessment team must determine not only whether a threat has been made or communicated, but also if a person poses a danger to self or others or if they are potentially on a <u>pathway to violence</u>. The threat assessment team must coordinate resources to provide intervention to individuals whose behavior may pose a threat to the safety of school staff or students. The threat assessment team must plan for the implementation and monitoring of appropriate interventions in order to manage or mitigate the student's risk for engaging in violence and increasing the likelihood of positive outcomes. Interventions should remain in place until the team assesses that the student is no longer in need of supports and does not pose a threat to self or others (8).

Assemble all mandatory BTA team members to collaboratively analyze available data, determine final level of risk, and develop appropriate interventions.

The BTA document must be finalized at the end of Part 3 and then acknowledged by the principal and by the cadre directors for accountability. See <u>Finalize BTA</u> and <u>Signature Page</u> section for more information.

#### Analysis

Answer **18 key questions** to analyze potential <u>risk factors</u>, <u>warning behaviors</u> and <u>mitigating circumstances</u>. These items can help assess whether a threat is unfounded/transient or substantive but must be considered in the broader context of the situation and other known facts. Regard these items as a checklist to make sure you have considered these aspects of the threat, but they are not to be summed or used as a score. **Consider all information** collected during the <u>Initial Phase/Triage Process</u> and in BTA <u>Part 1</u> and <u>Part 2</u>.

If more information is needed to answer the questions below, a Clinical Student and/or Clinical Parent Interview (<u>Interview Documents</u>) should be conducted by a mental health professional. The presence of law enforcement is not recommended during clinical interviews.

- ☐ Threat is Likely to be Less Serious:
  - 1. Subject admits to threat (statement or behavior).
  - 2. Subject has explanation for threat as benign (such as a joke or figure of speech).
  - 3. Subjects admits to feeling angry toward target at time of incident.
  - 4. Subject retracts threat or denies intent to harm.
  - 5. Subject apologetic or willing to make amends for threat.
  - 6. Subject willing to resolve threat through conflict resolution or some other means.
- ☐ Threat is Likely to be More Serious:
  - 7. Subject continues to feel angry toward target.
  - 8. Subject expressed threat on more than one occasion.
  - 9. Subject has specific plan for carrying out the threat.
  - 10. Subject engaged in preparation for carrying out the threat.
  - 11. Subject has prior conflict with target or other motive.
  - 12. Subject is suicidal (Complete suicide assessment).
  - 13. Threat involved use to a weapon other than a firearm, such as a knife or club.
  - 14. Threat involves use of a firearm.
  - 15. Subject has possession of, or ready access to, a firearm.
  - 16. Subject has or sought accomplices or audience for carrying out threat.
  - 17. Threat involves gang conflict.
  - 18. Threat involves peers or others who have encouraged subject in making threat.
  - 19. Comments/Other Relevant Observations.

#### Observations Suggesting Need for Intervention

Observations Suggesting Need for Intervention can be used as needed for intervention planning. Here are some factors to consider in identifying possible interventions to assist the subject and reduce risk. These items are not summed or scored:

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- 1. History of physical violence.
- 2. History of criminal acts.
- 3. Preoccupation with violence, violent individuals, or groups that advocate violence.
- 4. Preoccupation with mass shootings or infamous violent incidents.
- 5. History of intense anger or resentment.
- 6. Has grievance or feels treated unfairly.
- 7. Feels abused, harassed, or bullied.
- 8. History of self-injury or suicide ideation or attempts.
- 9. Has been seriously depressed.
- 10. Experienced serious stressful events or conditions.
- 11. Substance abuse history.
- 12. History of serious mental illness (symptoms such as delusions or hallucinations).
- 13. Qualifies for exceptional education services or 504 plan.
- 14. Prescribed psychotropic medication.
- 15. Substantial decline in level of academic or psychosocial adjustment.
- 16. Lacks positive relationships with one or more school staff.
- 17. Family involvement.
- 18. Lacks positive relationships with peers.
- 19. Other factors that suggest need for intervention.
- 20. Comments/Other Relevant Observations.

#### Determination of Risk Level

Does the individual pose a threat of targeted violence toward one or more individuals? Thoughtful consideration of the answers to the above key questions will produce a sound foundation for the determination of risk level. When making a determination between unfounded/transient and substantive threats, take into account whether or not the individual is exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the plan. If there is doubt or if the threat cannot clearly be categorized as unfounded/transient, threats should be treated as substantive.

Regardless of preliminary determination that a student poses a unfounded/transient or substantive threat to others, the BTA team should consider all information collected throughout the BTA process to make this final determination of risk level. As a result of data-collection and analysis during the BTA process, the final risk level indicated in Part 3 may not always reflect the preliminary determination made at the <u>Initial Phase/Triage Process</u>.

Please see <u>Considerations for Determination of Risk Level</u> section for more guidance and information to help the BTA team make its final determination of risk level:

| Unfounded/No   | Threat: | Following | a | threat | assessment, | the | threat | could | not | be | corroborated | or |
|----------------|---------|-----------|---|--------|-------------|-----|--------|-------|-----|----|--------------|----|
| substantiated. |         |           |   |        |             |     |        |       |     |    |              |    |
|                |         |           |   |        |             |     |        |       |     |    |              |    |

☐ *Transient*: Threats where there is not a sustained intent to harm. Threat may have been made in the heat

of the moment as an expression of anger, frustration, or humor.

| ☐ Serious Substantive*: Threat where the intent to harm is present and included a threat to hit or fight. There is at least some risk that the person will carry out the threat and requires protective action.  |
|--|
| ☐ Very Serious Substantive*: Threat where the intent to harm is present and included a threat to kill, rape, shoot, or injure with a weapon. There is at least some risk that the person will carry out the threat and requires protective action.   |
| * Please note that for <i>Serious Substantive/Very Serious Substantive</i> threats, Clinical Parent and Clinical Student Interviews ( <u>Interview Documents</u> ) must be conducted to assist with developing the Student Support Plan (SSP).   |
| Basis for Determination Statement  |
| Threat assessment teams must consider the totality of risk factors, warning behaviors, stressors, precipitating events, and protective factors present. This should be analyzed in the context of the student of concern's age and social/emotional development to determine credibility and seriousness of the threat. Distinguishing between unfounded/transient versus substantive threats is critical to the determination of appropriate responses. As a reminder, substantive threats are behaviors or statements that represent a risk of harm to others and are characterized by qualities that reflect a serious intent to do harm. |
| Parent Notification  |
| Please be advised that while parental consent is not required when conducting a threat assessment, parent notification is required. Parent notification is required at this phase if not already contacted for <u>imminent threat</u> or clinical interviews completed for <u>Analysis</u> . Document the date, time, and name of the parent, and the outcome of the notification. Parents should be informed of the nature of the threat, who was threatened, and the consequences for the student if the threat is carried out. Enlist parental support and assistance in preventing the student from carrying out the threat.             |
| Actions  |
| Once the final level of risk has been determined, the BTA team will follow the mandatory actions that correspond to that level of risk identified. Identify which individual is responsible for each mandatory action step:  |
| <ul> <li>Unfounded/No Threat</li> <li>Contact student's parents and/or guardian.</li> <li>Additional responses, as determined by the threat assessment team.</li> <li>Transient</li> <li>Contact student's parents and/or guardian.</li> </ul>   |
| <ul> <li>See that threat is resolved through explanation, apology, or making amends.</li> <li>Follow discipline procedures as per policies 5.8 and 5006, if applicable.</li> <li>Additional responses, as determined by the threat assessment team.</li> </ul>   |

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o Contact student's parents and/or guardian.

☐ Serious Substantive

o Provide direct supervision of student until parents and/or guardians assume control.

- o Caution the student about the consequences of carrying out the threat.
- o Conduct Clinical Parent Interview.
- o Conduct Clinical Student Interview.
- Consult with SRO to assist in monitoring/supervising the student and determining need for law enforcement action. Document the name of the person who consulted with law enforcement, date, and the title of contact.
- Screen the student for mental health services and counseling and refer the student for school-based or community-based services as needed.
- o Refer to CPS Team to determine need for academic/behavioral intervention and/or the need for psychological evaluation.
- o Develop a Monitoring Plan to include a Safety Plan within 72 hours.
- Assign team member(s) to monitor student and status of intervention(s).
- o Follow discipline procedures as per policies 5.8 and 5006.

### ☐ Very Serious Substantive

- o Caution the student about the consequences of carrying out the threat.
- o If the intended target is a student, notify the intended target(s)'s parents and/or guardians. If the intended target is an adult, notify the intended target(s).
- o Contact student's parents and/or guardian.
- o Provide direct supervision of student until parent and/or guardian(s) assume control.
- o Conduct Clinical Parent Interview.
- o Conduct Clinical Student Interview.
- Screen the student for mental health services and counseling and refer the student for school-based or community-based services as needed.
- o Refer to CPS Team to determine need for academic/behavioral intervention and/or the need for psychological evaluation.
- Consult with SRO to assist in monitoring/supervising the student and determining need for law enforcement action. Document the name of the person who consulted with law enforcement, date, and the title of contact.
- o Develop a Monitoring Plan to include a Safety Plan within 72 hours.
- Assign team member(s) to monitor student and status of intervention(s).
- o Follow discipline procedures as per policies 5.8 and 5006.
- If the threat assessment records were shared with Law Enforcement, please complete the FERPA log and contact the Privacy Officer if clarification is needed.

### Action Steps & Support Plan

In addition to the mandatory action steps, the team will identify responses that can help support this student and make positive outcomes more likely. The actions selected will comprise the Student Support Plan (SSP). The resources and supports the student needs will differ depending on the information gathered during the assessment. Supports can range from holding a parent conference to creating a safety plan for the student. Some actions may need to be taken immediately (e.g., safety plan) while others (e.g., IEP meetings) may need to occur at a later time. For assistance, please use the Observations Suggesting Need for Intervention within Part 3 Analysis to help you team determine possible interventions to assist the student to reduce risk.

Review all actions (mandatory and additional) with individuals who did not participate in the threat assessment who work with the student.

## Notify Law Enforcement

☐ Was law enforcement contacted due to <u>imminent threat?</u> Complete ONLY when notifying law enforcement in cases of <u>imminent</u> threat to others.

## Meeting Participants

☐ Identify the name and title of each of the BTA mandatory team members and any additional team members who participated in the threat assessment. Mandatory team members must be added to the school's core team and any additional team members must be added to the student's BTA team (Refer to EdPlan Main Menu> Resource Information> BTA).

Reminder: For **substantive** threats, the <u>threat assessment team</u> shall include persons with expertise in counseling, instruction, school administration, principal - when available, and law enforcement. Persons with expertise in counseling include school counselors, school psychologists, school social workers, and family counselors. Additional personnel with knowledge of the child or circumstances may also serve as additional members of the team (8). BTA team members who have been threatened should serve as a witness and source of information (e.g., Witness Interview, Teacher Input Form), but should not serve as a BTA team member to avoid conflict of interest issues and potential loss of objectivity. If possible, an alternate team member should be appointed to fill the role of the threatened BTA team member.

#### Finalize BTA

Select COMPLETE THREAT ASSESSMENT once the BTA team has completed Parts 1 through 3 and all required interviews and forms for the BTA process. *Please note: Finalizing this document will send alerts to the predetermined individuals for notification (i.e., School Principal).* 

- ➤ Once a BTA document has been finalized, the school principal must acknowledge the finalized BTA within approximately 48 hours by clicking the Acknowledge Threat Assessment button in Part 3 of the BTA.
- ➤ Once the principal acknowledges the BTA, Cadre Directors will be emailed an alert to Acknowledge.

Along with the electronic record in EdPlan, completed threat assessments must be documented in TERMS. *The TERMS Intervention code must be assigned to the lead administrator's 3-digit contact code, which is assigned through a school-level IMT.* The lead administrator for the BTA will enter the TERMS L-Panel code that corresponds with the determined risk level:

- ➤ 220- Schl Safety **Unfounded**
- > 221- Schl Safety **Transient**
- > 222- Schl Safety **Serious Substantive**
- > 223- Schl Safety Very Serious Substantive

## Signature Page

Print the final page of the BTA from the student's Documents tab. All required team members must confirm their participation by signing the form and indicating they participated in-person, virtual format (i.e., Zoom/Teams), via telephone, etc.

- ➤ If the final determination is that the threat is **unfounded/transient**, signatures for the administrator and at least one other school based BTA team member are required. If additional team members participated, their signatures are also required. For unfounded/transient threats, the case manager must select "Transient-Not Required" for the core BTA team members that were not required and did not participate in the BTA.
- ➤ If the final determination is that the threat is **substantive**, signatures for all four mandatory team members are required. If additional team members participated, their signatures are also required.

Upload the scanned signature page to the Documents tab for the student. On the Documents tab for the student, you will click 'Upload External Attachments', select the scanned signature page from your computer, and then select the Behavioral Threat Assessment document that it applies to (Refer to EdPlan Main Menu> Resource Information> BTA).

### **Monitoring Plan**

Once the BTA and SSP have been finalized, the team is required to schedule a meeting within 72 hours to create and finalize a Monitoring Plan for **Serious/Very Serious Substantive** threat levels. For **Unfounded/Transient** risk levels, the team may create a corresponding Monitoring Plan if needed.

The Monitoring Plan is for on-going monitoring of support/services. The level of supervision provided to the student should be consistent with the nature and seriousness of the threat. Through the Monitoring Plan, the team identifies any actions that require continued implementation and monitoring. This includes any further actions to be taken with the student who made the threat or displayed concerning behavior. The team will also identify any actions to be taken with potential victims of the threat and/or any students impacted by the threat. The Monitoring Plan can also include documentation of any disciplinary actions taken, if applicable.

- ➤ The team shall identify further actions on the Monitoring Plan that must be implemented in order to mitigate risk to others (e.g., backpack checks, safety plan, etc.). A Safety Plan is required for Serious/Very Serious threats.
- ➤ Identify the names and titles of individuals who participated in the development of the Monitoring Plan. It is recommended that the original BTA members, along with the parent(s)/guardian(s) of the student of concern also be included in its development.
- ➤ Once the team has identified further actions to be taken, they must select FINALIZE MONITORING PLAN within 72 hours of completing BTA Part 1-3. Please note: Finalizing this document will send alerts to the predetermined individuals for notification (i.e., School Principal).
- > Print the final page of the Monitoring Plan from the student's Documents tab. Team members must confirm their participation by either signing the form or indicating they participated via telephone, etc.
- ➤ Upload the scanned signature page to the Documents tab for the student. On the Documents tab for the student, you will click 'Upload External Attachments', select the scanned signature page from your computer, and then select the Monitoring Plan document that it applies to. (Refer to EdPlan Main Menu> Resource Information> BTA).

- ➤ The BTA team must reconvene every 30 school days (or earlier, if warranted) from the development of the initial Monitoring Plan for review and modifications. Identify and select the review date in the Monitoring Plan before finalizing. Maintain documentation (e.g., logs, data) for all actions selected on the Monitoring Plan.
  - o Upon review of a student's Monitoring Plan, the team must determine whether to:
    - Continue Monitoring Plan with revisions.
    - Continue Monitoring Plan with no revisions.
    - Close Monitoring Plan.
  - o The team must enter a rationale for their decision above.

### **Maintenance of Records and Information Sharing**

- ➤ BTA records are considered education records and shall be maintained and released in accordance with FERPA and state statute. The BTA process is a substantive decision-making process and therefore is not subject to the amendment process as described in School Board Policy 5100.1(V). Additionally, these records will be transferred pursuant to School Board Policy 5100.2.
- SBBC will disclose personally identifiable information (PII) contained in education records or the education records themselves to other agencies when provided with a signed written consent from the student's parent/guardian or student age 18 or older designating the information that may be released.
- ➤ Pursuant to FERPA regulations and applicable state statutes, SBBC may disclose PII contained in education records or the education records in the following circumstances without obtaining written consent from the student's parent/guardian or student age 18 or older:
  - Health and safety emergency;
  - o Lawfully issued subpoena or court order;
  - o Upon request by authorized representatives of the state and local educational authorities.
- School-based administrators must ensure that the FERPA log is completed when disclosures are made.
  - o The FERPA log can be found by clicking the following link: FERPA DISCLOSURE LOG.
  - o If further assistance is needed, please contact the Risk Management Privacy Officer at (754) 321-1914.
- If, during the course of conducting the BTA, an articulable health and safety emergency is identified, SBBC may share PII from a student's educational record with those state and local agencies and programs (e.g., Law Enforcement, DJJ, DOH, DCF, etc.) if the information is reasonably necessary to ensure access to appropriate services for the student(s) and to ensure safety of the student and others. School officials may disclose **only** information from education records that is required to address the health or safety concern to one or more person whose knowledge of the information is necessary to protect the health and safety of students and other individuals.
- ➤ Pursuant to F.S. §1003.25, the procedure for transferring and maintaining records of students who transfer from school to school shall be prescribed by rules of the State Board of Education. The transfer of records shall occur within 3 school days. These records shall include verified reports of serious or recurrent behavior patterns, including threat assessment evaluations and intervention services.
- ➤ If requested on the day of the BTA meeting, SBBC shall provide BTA records and any other documents used during the BTA risk determination to the School Resource Officers (SRO) or other Law Enforcement officer (LEO) who participated as a BTA team member. If the BTA takes more than a day to finalize due to extenuating circumstances, the SRO or LEO who was an active participant in the BTA can request copies once the documents are finalized.

- An LEO's body cam or any other recording devices are not to be activated during behavioral threat assessment meetings and/or interviews (Source: *Use of Body Cams by Law Enforcement at Schools*, Office of the General Counsel Memorandum Dated 10/4/2019).
- ➤ When conducting a BTA, the threat assessment team may obtain criminal history record information from SRO's/Law Enforcement Officers. No member of the threat assessment team shall redisclose or use such information beyond the BTA process.
- ➤ Parents have the right to inspect their own child's records, if requested. If BTA records are shared or released, the names and identifying information of other students or witnesses must be redacted. All components of the BTA must be shared with a parent requesting to inspect these records. Please refer to <a href="https://example.com/BTA Overview">BTA Overview</a> for a list of required components.

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## **APPENDIX A: Student Risk Intake Form**

Forms are to be entered into EdPlan. If printed forms are utilized, the information must be entered or uploaded as an attached source into EdPlan.

The Student Risk Intake Form is to be utilized to document the initial report of concern. The Student Risk Intake Form is the beginning of the process and will always lead to either a behavioral threat assessment (BTA) and/or suicide risk assessment (SRA). This is to be completed by a school-based administrator using information from the individual(s) making the report.

#### **STUDENT RISK INTAKE FORM (Page 1 of 3)**

#### INFORMATION ABOUT THE INCIDENT

| Incident Type:                          | Today's Date:     |   |
|---|-------------------|---|
| Who reported this initial concern?      |                   |   |
| Contact Number:                         |                   |   |
| Affiliation to School:                  |                   |   |
| Who was this concern reported to?       |                   |   |
| Contact Number:                         |                   |   |
| Affiliation to School:                  |                   |   |
| Date Reported:                          | Time Reported:    |   |
| Date Administrator Learned of Incident: |                   |   |
| DMS Incident Number (if applicable):    |                   |   |
| Date of Incident:                       | Time of Incident: | _ |
| Location of Incident:                   |                   |   |

Write a narrative below detailing the incident, threat to self, threat to others, and/or concerning behavior reported. Please include the location and time of the incident, threat, or concerning behavior. Determine if there are other individuals who witnessed the student engaging in threatening, aberrant, or concerning behavior. Where threats were communicated, quote where possible, and use quotation marks to indicate direct quote. Attach original documentation, if available, later in the BTA and/or SRA processes.

## STUDENT RISK INTAKE FORM (Page 2 of 3)

| Narra          | tive:  |
|----------------|--|
|                |  |
| └──<br>If a th | reat to others has been made, has the intended target been identified? (Circle One): Yes No  |
|                | Primary Target(s):   |
|                | Target Names:  |
| WITN           | ESSES (if applicable): Name of Witness:  |
| Nama           | Contact Number:  of Law Enforcement Official Contacted (imminent threats only):  |
| vanic          | Date Contacted:Time Contacted:   |
|                | Outcome of Law Enforcement Official Contact:   |
|                | Threat to Others: If the individual is suspected of posing a threat of harm to others, mobilize the threat assessment team and intitiate the BTA within 24 hours, starting with BTA Part 1. If imminent threat to others is suspected, follow mandatory steps to respond to imminent threats towards others.  Threat to Self: If the individual is suspected of posing a threat of harm to self, then ensure the student is medically safe, maintain adult supervision, and contact a Suicide Designee or other mental health professional to conduct Suicide Risk Assessment (SRA) immediately. If imminent threat to self is suspected, follow mandatory steps to respond to imminent threats towards self. Please note: If it is a threat to self ONLY you DO NOT complete any components of the Behavioral Threat Assessment process. (2). |

If **both** a threat to self and others is selected above, **both the BTA and SRA processes** must be completed. Each situation is unique and needs to be assessed to determine which process to follow first. If you require assistance, please contact the Psychological Services Department (754) 321-3440 for BTA assistance and the SEDNET Department (754) 321-3421 for SRA assistance.

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# **APPENDIX B: BTA Incident Information Form**

Forms are to be entered into EdPlan. If printed forms are utilized, the information must be entered or uploaded as an attached source into EdPlan.

In addition to initial information obtained through the Student Risk Intake Form, Part 1 documents more specific details regarding the incident and/or threat report and any immediate actions taken when an imminent threat has been identified. The BTA Part 1 is to be completed by a school-based administrator using information from the individual(s) making the report. BTA Part 1-3 must be intiated within 24 hours of receiving the report.

## **INCIDENT INFORMATION FORM (Page 1 of 3)**

## INFORMATION ABOUT THE INCIDENT

| Incident Type:                          | Today's Date:     |
|---|-------------------|
| Who reported this initial concern?      |                   |
| Contact Number:                         |                   |
| Affiliation to School:                  |                   |
| Who was this concern reported to?       |                   |
| Contact Number:                         |                   |
| Affiliation to School:                  |                   |
| Date Reported:                          | Time Reported:    |
| Date Administrator Learned of Incident: |                   |
| DMS Incident Number (if applicable):    |                   |
| Date of Incident:                       | Time of Incident: |
| Location of Incident:                   |                   |

Write a narrative below detailing the incident, threat to others, and/or concerning behavior reported. Please include the location and time of the incident, threat, or concerning behavior. Determine if there are other individuals who witnessed the student engaging in threatening, aberrant, or concerning behavior. Where threats were communicated, quote where possible, and use quotation marks to indicate direct quote. Attach original documentation, if available, later in the BTA process.

# **INCIDENT INFORMATION FORM (Page 2 of 3)**

| Narrative:  |
|---|
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
| What was the context for the behavior? What was happening at the time and/or just before?   |
|   |
|   |
|   |
| If a threat to others has been made, has the intended target been identified? (Circle One): Yes No  |
| Primary Target(s):  |
| Target Names:   |
| WITNESSES (if applicable): Name of Witness:   |
| Affiliation:  |
| Contact Number:   |
| Intake Outcome:   |
| ☐ If imminent threat to others is suspected, then contact law enforcement immediately and follow mandatory steps to respond to imminent threats towards others. |

#### **INCIDENT INFORMATION FORM (Page 3 of 3)**

| of <u>imminent</u> threat to others.   |
|--|
| Name of Law Enforcement Official Contacted:  |
| Date of Law Enforcement Contact:   |
| Time of Law Enforcement Contact:   |
| Outcome of Law Enforcement Contact:  |
|  |
| ☐ Mobilize the threat assessment team and complete all required components of a BTA. |

Regardless of law enforcement action, the threat assessment team must gather relevant information and initiate the BTA within 24 hours of the administrator receiving the initial report. Ideally, the Initial Student Interview should be conducted right away, so that if the threat is substantive, action can be taken promptly to prevent the threat from being carried out. However, in some cases it may not be possible to conduct an immediate interview – for example, if the threat was not reported until hours or days after it occurred or if the student is no longer on school premises. If it is not possible to interview the student right away, the team should gather information that is immediately available (perhaps by interviewing witnesses to the threat and/or reviewing available educational records) and decide on a reasonable, provisional course of action that emphasizes safety of anyone targeted by the threat. However, in most cases a team member will interview the student at the first opportunity in order to conduct a more complete assessment. If there are extenuating circumstances that delay access to the student or parent to complete the required interviews, the team should note the reason for delay on the EDPlan Info>Contacts Tab in EdPlan (e.g., attempts to contact parent/student and why either one was unavailable). Once all required components are completed, the BTA documents must be listed as finalized documents on the EdPlan Documents tab.

If school is not in session, the school principal shall immediately refer the matter to law enforcement for evaluation, and the threat assessment team must meet no later than the end of the first day school is back in session to consider the matter and ensure it is resolved  $(\underline{8})$ .

# **APPENDIX C: BTA Witness Interview**

Forms are to be entered into EdPlan. If printed forms are utilized, the information must be entered or uploaded as an attached source into EdPlan.

The purpose of this interview is to gather information about the threat(s) or concerning behavior from potential victims or witnesses.

# WITNESS INTERVIEW (Page 1 of 2)

| Sta | atement Date:  |
|-----|--|
| Pe  | erson Taking Statement:  |
| Lo  | ocation of Interview:  |
| thr | rections: Use these questions as a guide to interview the person who witnessed the concern and/or was targeted by the reat. Ask other questions as appropriate. Try to use open-ended questions rather than leading questions. If witness is a nor, record parent under emergency contact. |
| W   | ITNESS INTERVIEW QUESTIONS   |
| 1.  | Do you know why I want to talk to you? What happened today when you were [place of incident]? (Record person's exact words with quotation marks for key statements if possible.)   |
| 2.  | What exactly did (subject) say? And what exactly did (subject) do?   |
| 3.  | What did you think he or she meant when he or she said or did that? (Does witness believe that subject intends to carry out the threat?)   |
| 4.  | How do you feel about what (subject) said or did?  |
|     |  |

# WITNESS INTERVIEW (Page 2 of 2)

| 5. | What was the reason (subject) said or did that? (Probe to find out if there is a prior conflict or history to this threat.)   |
|----|---|
| 6. | What are you going to do now? (Ask questions to determine how witness plans to respond to the threat and assist in planning a safe and non-provocative response.) What do you think he/she will do now? |
| PO | TY THREAT SHOWN BY THIS INTERVIEW TO BE REALISTIC, WELL PLANNED, AND/OR TENTIALLY LETHAL SHOULD BE CONSIDERED VIABLE. LAW ENFORCEMENT SHOULD BE ONTACTED IMMEDIATELY.                                   |
|    |   |
|    |   |
|    |   |
|    |   |
|    |   |

# **APPENDIX D: BTA Initial Student Interview**

Interviews are to be entered into EdPlan. If printed forms are utilized, the information must be entered or uploaded as an attached source (Click on + sign next to the corresponding "Interviewee Name/Interviewed By" row within Interviews and Sources above) into EdPlan. This document has been translated to multiple languages (Haitian-Creole, Portuguese, Spanish). Translated versions are available on EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

## **INITIAL STUDENT INTERVIEW (Page 1 of 2)**

| Sch<br>Inte         | ident Name:<br>nool Name:<br>erviewer Name:<br>erviewer #2 Name: (optional)  | Student ID: Date of Interview: Interviewer Title: Interviewer #2 Title: (o                 | Grade:  |
|---------------------|--|--|---|
| be j<br>stud<br>adj | ections: Must be completed by a school-based administrator, present. Please begin by attempting to establish rapport, then dent who either made a threat or exhibited a behavior of consust the language of the questions accordingly. Use these quest other questions as appropriate. Try to use open-ended quest | n use these interview quest<br>cern. Consider the develop<br>ctions as a guide to intervie | tions as a guide to interview the pmental level of the student and ew the person making the threat. |
| 1.                  | Do you know why I want to talk to you? What happened person's exact words with quotation marks for key state   | •  | e [place of incident]? (Record  |
| 2.                  | What exactly did you say and what exactly did you do?  |  |   |
| 3.                  | What did you mean when you said or did that?   |  |   |
| 4.                  | How do you think [person that was threatened] feels abbelieves it frightened or intimidated the person.)   | out what you said or did   | d? (Probe to see if the subject   |
| 5.                  | What was the reason you said or did that? (Probe to find   | out if there is a prior cor  | nflict or history to this threat.)  |

# **INITIAL STUDENT INTERVIEW (Page 2 of 2)**

| 6. | What are you going to do now? (Ask questions to determine if the subject intends to carry out the threat.) |
|----|--|
|    |  |
|    |  |
|    |  |
| Ke | y Observations:  |
|    |  |
|    |  |
|    |  |
|    |  |
|    |  |
|    |  |
|    |  |
|    |  |

ANY THREAT SHOWN BY THIS INTERVIEW TO BE REALISTIC, WELL PLANNED, AND/OR POTENTIALLY LETHAL SHOULD BE CONSIDERED VIABLE. LAW ENFORCEMENT SHOULD BE CONTACTED IMMEDIATELY.

# **APPENDIX E: BTA Teacher Input Form**

Interviews are to be entered into EdPlan. If printed forms are utilized, the information must be entered or uploaded as an attached source (Click on + sign next to the corresponding "Interviewee Name/Interviewed By" row within Interviews and Sources above) into EdPlan.

|            | TEACHER INPUT  | FORM (Page 1 of 3)  |                                     |
|------------|--|---|-------------------------------------|
| Scl<br>Tea | ndent Name:<br>nool Name:<br>acher Name:<br>bject Taught:  | Student ID:<br>DOB:<br>Date of Completion<br>Current Course Gra |                                     |
| infe<br>be | rections: Some concerns have been raised about this stude<br>ormation from each of his/her teachers about his/her beha<br>very helpful in developing a support plan for this student.<br>lowing questions to the best of your knowledge. | avior in a variety of setting                                   | gs. The information you provide wil |
| A(         | CADEMICS   |   |                                     |
| 1.         | How is the student doing academically? Has there   | been any change in rece   | nt weeks?                           |
| 2.         | What are the student's verbal skills? How well can l   | he/she explain himself/h  | erself in words?                    |
| 3.         | Has this student been considered for special education difficulties does the student have? If a student is received behaviors that are regarded as part of his/her disability.   | eiving special education  |                                     |
| TE         | CACHER KNOWLEDGE OF THE THREAT   |   |                                     |
| 1.         | What do you know about the threat?   |   |                                     |
| 2.         | Have you heard this student talk about things like t   | his before?   |                                     |

# TEACHER INPUT FORM (Page 2 of 3)

| 3.  | What have other students told you about this incident?   |
|-----|--|
| 4.  | Is there another teacher or staff member who might know something about this?  |
| STU | UDENT'S PEER RELATIONS   |
| 1.  | How well does this student get along with other students?  |
| 2.  | Who are the student's friends?   |
| 3.  | Are there students who do not get along with this student?   |
| 4.  | Have there been conflicts or difficulties with peers?  |
| 5.  | Has this student ever complained of being bullied, teased, or treated unfairly by others?  |
| DE  | PRESSION   |
| 1.  | Have there been any apparent changes in the student's mood, demeanor, or activity level? Seemed withdrawn or apathetic?  |
| 2.  | Has the student expressed any attitudes that could imply depression, such as expressions of hopelessnes or futility, inadequacy or shame, self-criticism or worthlessness? |

# TEACHER INPUT FORM (Page 3 of 3)

| 3.  | Has this student shown an increase in irritability or seemed short-tempered?  |
|-----|---|
| DI  | SCIPLINE  |
|     | What kinds of discipline problems have you experienced with this student?   |
| 2.  | How does this student respond to being corrected by an adult?   |
| 3.  | What are the student's emotional responses to being disciplined?  |
|     | GRESSION  |
| 1.  | How does this student express anger?  |
| 2.  | Does this student seem to hold a grudge? Seem resentful?  |
| 3.  | Has this student done anything that expresses anger or aggression, or has an aggressive theme in written assignments, drawings, class projects, etc.? |
| PA: | RENTS   |
| 1.  | Have you had any contact with this student's parents? What happened?  |

# **APPENDIX F: BTA Review of Records**

Complete a review of relevant records (i.e. cumulative file, BASIS, EDPlan, Pinnacle, TERMS, Acceliplan, etc.) and summarize any information relevant to the threat assessment process. Attach any additional relevant artifacts pertaining to the student's BTA. Specify name of reviewer and job title for each section.

| RECORDS<br>REVIEW                     | SUMMARY | NAME AND TITLE<br>OF REVIEWER |
|---------------------------------------|---------|-------------------------------|
| Behavioral/<br>Discipline History     |         |                               |
| ESE, 504 and/ or<br>Gifted History    |         |                               |
| Academic/<br>Attendance History       |         |                               |
| Records from<br>Outside Agencies      |         |                               |
| Law Enforcement<br>Records            |         |                               |
| Employment<br>Records                 |         |                               |
| Classwork/<br>Homework<br>Assignments |         |                               |
| Journal/ Artwork                      |         |                               |

| RECORDS<br>REVIEW | SUMMARY | NAME AND TITLE<br>OF REVIEWER |
|-------------------|---------|-------------------------------|
| Social Media      |         |                               |
|                   |         |                               |
|                   |         |                               |
| Other             |         |                               |
|                   |         |                               |
|                   |         |                               |

Has the student previously posed a threat? ( ) Yes  $\,$  ( ) No

# **APPENDIX G: BTA Analysis and Risk Level**

Assemble all mandatory BTA team members to collaboratively analyze available data, determine level of risk, and develop appropriate interventions. The BTA team must answer the 10 key questions below to analyze potential risk factors, warning behaviors, and mitigating circumstances. Consider all information collected in Part 2: Interviews and Sources. If more information is needed to answer the questions below, a Clinical Student and/or a Clinical Parent Interview should be conducted by a mental health professional.

| Threat is likely to LESS SERIOUS: |
|-----------------------------------|
|-----------------------------------|

| 1.    | Subje    | ect admits to t | threat | (statement or b   | oehav   | ior)                                  |
|-------|----------|-----------------|--------|-------------------|---------|---------------------------------------|
|       |          | Yes             |        | No                |         | Not Available                         |
| 2.    | Subje    | ect has explan  | ation  | for threat as be  | enign   | (such as joke or figure of speech).   |
|       |          | Yes             |        | No                |         | Not Available                         |
| 3.    | Subje    | ect admits fee  | ling a | angry toward ta   | rget a  | at time of incident.                  |
|       |          | Yes             |        | No                |         | Not Available                         |
| 4.    | Subje    | ect admits to t | threat | (statement or b   | oehav   | ior)                                  |
|       |          | Yes             |        | No                |         | Not Available                         |
| 5.    | Subje    | ect apologetic  | or w   | illing to make a  | amen    | ds for threat.                        |
|       |          | Yes             |        | No                |         | Not Available                         |
| 6.    | Subje    | ect willing to  | resol  | ve threat throug  | gh coi  | nflict resolution or some other means |
|       |          | Yes             |        | No                |         | Not Available                         |
| Comn  | onto:    |                 |        |                   |         |                                       |
| Comm  | ients.   |                 |        |                   |         |                                       |
|       |          |                 |        |                   |         |                                       |
|       |          |                 |        |                   |         |                                       |
|       |          |                 |        |                   |         |                                       |
|       |          |                 |        |                   |         |                                       |
| Threa | at is li | kely to MO      | RE S   | SERIOUS:          |         |                                       |
|       |          |                 |        |                   |         |                                       |
| 7.    | Subje    |                 | to fee | el angry toward   | targe   |                                       |
|       |          | Yes             |        | No                |         | Not Available                         |
| 8.    | Subje    | -               | threa  | t on more than    | one c   |                                       |
|       |          | Yes             |        | No                |         | Not Available                         |
| 9.    | Subje    | -               | ic pla | n for carrying o  | out the |                                       |
|       |          | Yes             |        | No                |         | Not Available                         |
| 10    | . Subje  |                 | n prep | paration for car  | rying   |                                       |
|       |          | Yes             |        | No                |         | Not Available                         |
| 11    | . Subje  | ect has prior c | onfli  | ct with target of | r othe  | er motive.                            |
|       |          | Yes             |        | No                |         | Not Available                         |

| 12  | z. Sub                   | ect is suic   | 1 <b>uu</b> 1. (Co.               | P  | arciae abbebt     | ,   |
|---|--------------------------|---|-----------------------------------|--|-------------------|---|
|   |                          | Yes   |                                   | No   |                   | Not Available   |
| 13  | 3. Thr                   | eat involv  | ed use of                         | a weapo  | n other than      | a firearm, such as a knife or club.   |
|   |                          | Yes   |                                   | No   |                   | Not Available   |
| 14  | I. Thre                  | eat involve   | es use of a                       | a firearm  |                   |   |
|   |                          | Yes   |                                   | No   |                   | Not Available   |
| 15  | 5. Sub                   | ject has po   | ssession                          | of, or rea   | ndy access to     | o, a firearm.   |
|   |                          | Yes   |                                   | No   |                   | Not Available   |
| 16  | 5. Sub                   | ject has or   | sought a                          | ccomplic   | es or audier      | nce for carrying out threat.  |
|   |                          | Yes   |                                   | No   |                   | Not Available   |
| 17  | 7. Thre                  | eat involve   | es gang co                        | onflict.   |                   |   |
|   |                          | Yes   |                                   | No   |                   | Not Available   |
| 18  | 3. Thre                  | eat involve   | es peers o                        | r others v   | who have en       | acouraged subject in making threat.   |
|   |                          | Yes   |                                   | No   |                   | Not Available   |
|   |                          |   |                                   |  |                   |   |
| Comn  | nents/                   | Other Rele  | evant Obs                         | servation  | S                 |   |
|   |                          |   |                                   |  |                   |   |
|   |                          |   |                                   |  |                   |   |
|   |                          |   |                                   |  |                   |   |
|   |                          |   |                                   |  |                   |   |
|   |                          |   |                                   |  |                   |   |
| O1  | 4:                       | C   | 4: N                              | J 1 C  | T4 4              | *   |
| Obse  | ervati                   | ons Sugg  | sesting r                         | need for   | r Intervent       | 10n   |
| Used .  | as nee                   | eded for in   | terventio                         | n nlannin  | na Here are       | some factors to consider in identifying neggible intervention   |
|   |                          |   |                                   |  |                   |   |
|   |                          |   | ra reance                         | e risk. Th   |                   | some factors to consider in identifying possible intervention.<br>re not summed or scored.  |
| 1.  | Hist                     | ory of phy  |                                   |  |                   |   |
|   |                          |   | sical viol                        | lence.   |                   | re not summed or scored.  |
| 2   |                          | Yes   | sical viol                        | lence.<br>No   |                   |   |
|   |                          | Yes<br>ory of crir  | vsical viol                       | lence.<br>No   | ese items ar<br>_ | re not summed or scored.  Not Available   |
|   | Hist                     | Yes<br>ory of crir<br>Yes   | vsical viol  minal acts           | lence.<br>No<br>s.<br>No   | ese items ar      | Not Available  Not Available  |
|   | Hist                     | Yes<br>ory of crir<br>Yes   | vsical viol  minal acts           | lence.<br>No<br>s.<br>No   | ese items ar      | re not summed or scored.  Not Available   |
|   | Hist                     | Yes<br>ory of crir<br>Yes   | vsical viol  minal acts           | lence.<br>No<br>s.<br>No   | ese items ar      | Not Available  Not Available  |
| 3.  | Hist  Prec               | Yes ory of crir Yes occupation Yes  | vsical viol  minal acts  with vio | lence.<br>No<br>s.<br>No<br>lence, vio                               | ese items ar      | Not Available  Not Available  luals, or groups that advocate violence.  |
| 3.  | Hist  Prec               | Yes ory of crir Yes occupation Yes  | vsical viol  minal acts  with vio | lence.<br>No<br>s.<br>No<br>lence, vio                               | ese items ar      | Not Available  Not Available duals, or groups that advocate violence.  Not Available  |
| <ul><li>3.</li><li>4.</li></ul>                       | Hist Prec                | Yes ory of crir Yes occupation Yes occupation                                   | vsical viol                       | lence. No S. No lence, vio No ss shootin                             | ese items ar      | Not Available  Not Available duals, or groups that advocate violence.  Not Available nous violent incidents.                              |
| <ul><li>3.</li><li>4.</li></ul>                       | Hist Prec                | Yes ory of crir Yes occupation Yes occupation Yes                               | vsical viol                       | lence. No S. No lence, vio No ss shootin                             | ese items ar      | Not Available  Not Available duals, or groups that advocate violence.  Not Available nous violent incidents.                              |
| <ul><li>3.</li><li>4.</li><li>5.</li></ul>            | Hist  Prec  Prec  Hist   | Yes ory of crir Yes occupation Yes occupation Yes occupation Yes ory of inte    | with mas                          | lence. No S. No lence, vio No ss shootin No r or reser               | ese items ar      | Not Available  Not Available duals, or groups that advocate violence.  Not Available nous violent incidents.  Not Available               |
| <ul><li>3.</li><li>4.</li><li>5.</li></ul>            | Hist  Prec  Prec  Hist   | Yes ory of crir Yes occupation Yes occupation Yes ory of inte                   | with mas                          | lence. No S. No lence, vio No ss shootin No r or reser               | ese items ar      | Not Available  Not Available duals, or groups that advocate violence.  Not Available nous violent incidents.  Not Available               |
| <ul><li>3.</li><li>4.</li><li>5.</li></ul>            | Hist Prec Prec Hist Hist | Yes ory of crir Yes occupation Yes occupation Yes ory of inte Yes grievance     | with violense anger               | lence. No S. No lence, vio No ss shootin No r or reser No treated ur | ese items ar      | Not Available  Not Available duals, or groups that advocate violence.  Not Available nous violent incidents.  Not Available Not Available |
| <ul><li>3.</li><li>4.</li><li>5.</li><li>6.</li></ul> | Hist Prec Prec Hist Hist | Yes ory of crir Yes occupation Yes occupation Yes ory of inte Yes grievance Yes | with violense anger               | lence. No S. No lence, vio No ss shootin No r or reser No treated ur | ese items ar      | Not Available  Not Available duals, or groups that advocate violence.  Not Available nous violent incidents.  Not Available Not Available |

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| 8.   | Histor | ry of self-inju | ıry or | suicide ideatio  | n or a | attempts.                             |
|------|--------|-----------------|--------|------------------|--------|---------------------------------------|
|      |        | Yes             |        | No               |        | Not Available                         |
| 9.   | Has b  | een seriously   | depr   | essed.           |        |                                       |
|      |        | Yes             |        | No               |        | Not Available                         |
| 10.  | Expe   | rienced serio   | us str | essful events or | r cond | ditions.                              |
|      |        | Yes             |        | No               |        | Not Available                         |
| 11.  | Subst  | ance abuse hi   | istory |                  |        |                                       |
|      |        | Yes             |        | No               |        | Not Available                         |
| 12.  | Histor | ry of serious   | menta  | ıl illness (symp | toms   | such as delusions or hallucinations). |
|      |        | Yes             |        | No               |        | Not Available                         |
| 13.  | Quali  | fies for excep  | otiona | l student educa  | tion s | services or 504 plan.                 |
|      |        | Yes             |        | No               |        | Not Available                         |
| 14.  | Presci | ribed psychot   | tropic | medication.      |        |                                       |
|      |        | Yes             |        | No               |        | Not Available                         |
| 15.  | Subst  | antial decline  | in le  | vel of academic  | c or p | sychosocial adjustment.               |
|      |        | Yes             |        | No               |        | Not Available                         |
| 16.  | Lacks  | positive rela   | tionsl | nips with one o  | r moi  | re school staff.                      |
|      |        | Yes             |        | No               |        | Not Available                         |
| 17.  | Famil  | y involvemen    | nt.    |                  |        |                                       |
|      |        | Yes             |        | No               |        | Not Available                         |
| 18.  | Lack   | s positive rela | ations | hips with peers  | S.     |                                       |
|      |        | Yes             |        | No               |        | Not Available                         |
| 19.  | Other  | factors that s  | sugge  | st need for inte | rvent  | ion.                                  |
|      |        | Yes             |        | No               |        | Not Available                         |
|      |        |                 |        |                  |        |                                       |
| Comm | ents   |                 |        |                  |        |                                       |
|      |        |                 |        |                  |        |                                       |
|      |        |                 |        |                  |        |                                       |
|      |        |                 |        |                  |        |                                       |
|      |        |                 |        |                  |        |                                       |
|      |        |                 |        |                  |        |                                       |
|      |        |                 |        |                  |        |                                       |

### **RISK: DETERMINATION OF RISK LEVEL**

Thoughtful consideration of the answers to the above key questions will produce a sound foundation for the threat assessment team's response to the overarching question in a threat assessment inquiry: Does the individual of concern pose a threat of targeted violence toward one or more individuals?

|   | -   | to enter the corresponding intervention code (220<br>23 - Very Serious Substantive) in TERMS.  | ) -             |  |
|---|---|--|-----------------|--|
| <ul> <li>Not a Threat/Unfounded         Following a threat assessment, the threat could not be corroborated or substantiated.</li> <li>□ Transient         Threats where there is not a sustained intent to harm. Threat may have been made in the heat of the moment as an expression of anger, frustration, or humor.</li> <li>□ Serious Substantive         Threat where the intent to harm is present and included a threat to hit or fight. There is at least some risk that the person will carry out the threat and requires protective action.</li> <li>□ Very Serious Substantive         Threat where the intent to harm is present and included a threat to kill, rape, shoot, or injure with a weapon.         There is at least some risk that the person will carry out the threat and requires protective action.</li> </ul> |   |  |                 |  |
| <b>Basis for Determination</b>  |   |  |                 |  |
| events, and protective factors pro<br>social/emotional development to<br>transient versus substantive thre  | esent. This should be analyzed determine credibility and eats is critical to the determ or statements that represer | factors, warning behaviors, stressors, precipitating and in the context of the student of concern's age and seriousness of the threat. Distinguishing between ination of appropriate responses. As a remindent a risk of harm to others and are characterized by | nd<br>en<br>er, |  |
| Notify Law Enforcement (If A)  Date of Notification:  Law Enforcement Contact:  | Time of   | Notification:  |                 |  |
| <b>Meeting Participants</b>   |   |  |                 |  |
| Name  | Role Administrator  | Signature  |                 |  |
|   | Mental Health Professi  | onal   |                 |  |
|   | Law Enforcement Offi  | cial   |                 |  |
|   | Teacher   |  |                 |  |
|   | Other BTA Team Men  | aber   |                 |  |

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### **APPENDIX H: BTA Action Steps and Support Plan**

### **Mandatory Action Steps:**

Please refer to pages 28 & 29 in the manual to determine which action steps are required based upon the Risk Level Determination.

- o Caution the student about the consequences of carrying out the threat.
- o If the intended target is a student, notify the intended target(s)'s parents and/or guardians.
- o If the intended target is an adult, notify the intended target(s).
- o Contact student's parents and/or guardian.
- o Provide direct supervision of student until parent and/or guardian(s) assume control.
- Conduct Clinical Parent Interview.
- o Conduct Clinical Student Interview.
- Screen the student for mental health services and counseling and refer the student for school-based or community-based services as needed.
- o Refer to CPS Team to determine need for academic/behavioral intervention and/or the need for psychological evaluation.
- Consult with SRO to assist in monitoring/supervising the student and determining need for law enforcement action. Document the name of the person who consulted with law enforcement, date, and the title of contact.
- o Develop a Monitoring Plan to include a Safety Plan within 72 hours.
- Assign team member(s) to monitor student and status of intervention(s).
- o Follow discipline procedures as per policies 5.8 and 5006.
- o If the threat assessment records were shared with Law Enforcement, please complete the FERPA log and contact the Privacy Officer if clarification is needed.

### **Action Steps & Support Plan**

In addition to the mandatory action steps, please identify responses below that can help support this student and make positive outcomes more likely. The actions you select will comprise the Student Support Plan (SSP). The resources and supports the student needs will differ depending on the information gathered during the assessment. Supports can range from holding a parent conference to creating a safety plan for the student. It is recommended that the original threat assessment team members help develop the student support plan with the inclusion of the parent/guardian. Some actions may need to be taken immediately (e.g., safety plan) while others (e.g., IEP meetings) may need to occur at a later time. For assistance, please use observations suggesting need for interventions questions you answered above to help your team determine possible interventions to assist the student to reduce risk.

### **APPENDIX I: BTA Clinical Parent Interview**

Interviews are to be entered into EdPlan. If printed forms are utilized, the information must be entered or uploaded as an attached source (Click on + sign next to the corresponding "Interviewee Name/Interviewed By" row within Interviews and Sources above) into EdPlan. This document has been translated to multiple languages (Haitian-Creole, Portuguese, Spanish). Translated versions are available on EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

### **CLINICAL PARENT INTERVIEW (Page 1 of 8)**

Student Name: Student ID: Grade:

School Name: Date of Interview:

Parent/Guardian Name:

Interviewer Name: Interviewer Title:

Interviewer #2 Name: (optional)

Interviewer #2 Title: (optional)

Directions: A mental health professional must complete this interview with the parent/guardian. An additional school staff member may participate, if warranted. Please make every effort to establish rapport and engage the parent as an ally. Explain to the parent that the purpose of the interview is to help their child be safe and successful at school. Please use this as a guide to interview the parent/guardian and try to use open-ended questions rather than leading questions. As follow-up questions, as appropriate. Understandably, parents may feel apprehensive, guilty, or defensive when being interviewed about their child's behavior. It is important that the interviewer find ways to convey respect for the parent, starting from the initial contact and throughout the interview. Also, it should be evident that the interviewer is interested in understanding and helping the parent's child; otherwise, the parent may regard the interview as an investigation designed to uncover evidence of wrongdoing by the student or incompetence by the parent. Overall, the interviewer should make every effort to engage the parent as an ally. Emphasize the common goal of helping their child to be safe and successful in school.

### RAPPORT BUILDING AND INTERVIEW INTRODUCTION

I appreciate your meeting with me for this interview. I am a member of a school-based team that is responsible for evaluating student-made threats.

1. As you know, we are quite concerned about your son/daughter and the current situation. What is your view on what is happening? (If the parent/guardian is unaware of the concerns, explain the perceived threat or the behavior that led to this interview.)

In order to assist the school in providing your son/daughter with any needed help, I am going to ask you some additional questions.

### PARENT KNOWLEDGE OF THE THREAT

1. What do you (the parent) know about the threat?

# **CLINICAL PARENT INTERVIEW (Page 2 of 8)**

| 2. | Have you heard your child (or use child's name) talk about things like this before?  |
|----|--|
| 3. | Are you familiar with (the intended victim)? (Ask about the child's history with the intended victim- previous relationships and interactions.)  |
| 4. | Ask questions to determine if the child has the means to carry out the threat, such as access to firearms.   |
| 5. | What are you planning to do about the threat? (Is the parent willing to work with the school to develop a plan to ensure the threat will not be carried out and that the student's needs are addressed?) |
| SC | CHOOL ADJUSTMENT   |
| 1. | Has your child ever been suspended or expelled from school?  |
| 2. | Have you ever met with the school (teacher, counselor, principal) about concerns in the past? What happened, what was going on, what was the outcome?  |
| 3. | Has your child ever needed special help in school? Ever been retained?   |
| 4. | Has your child ever been tested in school?   |
|    |  |

# **CLINICAL PARENT INTERVIEW (Page 3 of 8)**

| 5. | How does your child like school?  |
|----|---|
| 6. | How often does your child do homework?  |
| 7. | What are your child's teachers like?  |
| FA | AMILY RELATIONSHIPS AND CURRENT STRESSORS   |
| 1. | Who lives in the home?  |
| 2. | Are there any important events that have affected your family/child? Ask about any recent or pending changes such as: Move, divorce/separation, losses; Financial status, employment changes for parents; Others in hom involved with the court or the law. |
| 3. | Who does your child share concerns with? Who is he/she close to?  |
| 4. | How well does he/she get along with parents? Siblings? Types of conflicts, over what, how resolved?   |
| 5. | How does your child show anger toward you and other family members?   |

# **CLINICAL PARENT INTERVIEW (Page 4 of 8)**

| What does your child do after school? Who supervises? What time is your child supposed to be home at night?                                       |
|---|
| What responsibilities does your child have at home?   |
| Does your child follow rules? What are the consequences for not following the rules?  |
| CER RELATIONS AND BULLYING  |
| Has your child reported being teased, intimidated, rejected, or bullied in some other way? (If so, what has the parent done in response?)         |
| Who are your child's friends? Are you pleased or displeased with your child's choice of friends?  |
| How much is the child influenced by peers? Are there any examples of your child doing something to please peers that got him or her into trouble? |
| ELINQUENT BEHAVIOR  |
| Has your child been in trouble with the law or with police before? What happened?   |
| Has your child ever gone to juvenile court? What was it about?  |
|   |

# **CLINICAL PARENT INTERVIEW (Page 5 of 8)**

| 3. | Has your child done things that could have gotten him or her arrested or in trouble with the law? What was the worst thing? What else? |
|----|--|
| 4. | Does your child drink beer, wine, or other alcohol?  |
| 5. | Does your child smoke marijuana?   |
| 6. | Has your child used any other drugs?   |
| H  | STORY OF AGGRESSION  |
| 1. | How does your child handle frustration?  |
| 2. | When your child gets angry, what does he/she do?   |
| 3. | Has your child gotten into fights in the past? When, where, with whom?   |
| 4. | Has your child's temper ever gotten him/her into trouble?  |
| 5. | Has your child ever hit you or other family members?   |

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# **CLINICAL PARENT INTERVIEW (Page 6 of 8)**

| 6.         | Has your child destroyed his or her own things, or someone else's property?  |
|------------|--|
| 7.         | Does your child have any pets? Has he/she ever intentionally hurt the pet or some other animal?  |
| <b>A</b> ( | CCESS TO WEAPONS   |
| 1.         | Do you have a gun in your home? Does your child have access to firearms through friends, relatives, or some other source?  |
|            |  |
| 2.         | Does your child have access to weapons other than firearms, such as military knives, martial arts weapons, or some other kind of weapon?                               |
| 3.         | Has your child ever talked about using a weapon to hurt someone? Ever gotten into trouble for using a weapon, carrying a weapon, or threatening someone with a weapon? |
|            |  |
| 4.         | What can you do to restrict your child's access to weapons?  |
| EX         | XPOSURE TO VIOLENCE  |
| 1.         | Has your child ever been a victim of abuse?  |
| 2.         | Is your child exposed to violence in the neighborhood?   |
|            |  |

# **CLINICAL PARENT INTERVIEW (Page 7 of 8)**

| 3. | Do people argue much at home? Has there been any physical aggression at home?  |
|----|--|
| 4. | What kind of movies, video games, internet sites does your child like? Any parent restrictions? Level of supervision? Child's response?  |
| н  | STORY  |
| 1. | Ask about any delays in cognitive, motor, language development. How old was your child when he/she started to walk/talk?   |
| 2. | Has your child ever had a problem with bedwetting? When, how long? Was anything done for this?   |
| 3. | Has your child ever been hospitalized? Had any serious illnesses?  |
| 4. | Has your child had any recent medical treatment? Taking any medications? Obtain diagnoses and medications. Ask for a release.  |
| M  | ENTAL HEALTH   |
| 1. | Does your child have any problems paying attention? Does your child follow directions without repetition and reminders? Does your child complete activities on his/her own? Does your child say things without thinking? Surprised by the consequences of his/her actions? |
| 2. | What has your child's mood been like the past few weeks?   |

# **CLINICAL PARENT INTERVIEW (Page 8 of 8)**

| 3.               | Has your child been unusually nervous or anxious? Irritable or short-tempered? How bad has it been?   |
|------------------|---|
| 4.               | Has your child had problems with sleep? Appetite? Energy level? Concentration?  |
| 5.               | Has your child ever talked about hurting himself or herself? Have you ever been concerned that he/she might be suicidal?  |
| 6.               | Have there been any times when your child seemed to be hearing things that weren't there? Has he/she said things that didn't make sense or seemed to believe in things that weren't real?   |
| 7.               | Has your child ever seen a counselor or therapist? Ever taken medication for his/her behavior or mood?  |
| 8.               | Has your child had any involvement with other agencies/programs in the community?   |
| the<br>cor<br>Yo | ose with a statement that describes short-term next steps and express gratitude to the parent/guardian(s) for eir support and follow through. You may wish to inform the parent/guardian that if any emergency situation mes up at home, they should immediately contact law enforcement and/or Mobile Response Team (previously buth Emergency Services Team) at (954) 677-3113. |
| PC               | NY THREAT SHOWN BY THIS INTERVIEW TO BE REALISTIC, WELL PLANNED, AND/OF<br>DTENTIALLY LETHAL SHOULD BE CONSIDERED VIABLE. LAW ENFORCEMENT SHOULD BE<br>ONTACTED IMMEDIATELY.  |

### **APPENDIX J: BTA Clinical Student Interview**

Interviews are to be entered into EdPlan. If printed forms are utilized, the information must be entered or uploaded as an attached source (Click on + sign next to the corresponding "Interviewee Name/Interviewed By" row within Interviews and Sources above) into EdPlan. This document has been translated to multiple languages (Haitian-Creole, Portuguese, Spanish). Translated versions are available on EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

|                                    | CLINICAL STUDENT INTERVIEW (Page 1 of 11)  |   |  |  |  |
|------------------------------------|--|---|--|--|--|
|                                    | t Name:  | Student ID:   | Grade:   |  |  |
| School                             |  | Date of Interview:  |  |  |  |
|                                    | ewer Name:   | Interviewer Title:  |  |  |  |
| Intervie                           | ewer #2 Name: (optional)   | Interviewer #2 Title: (op   | tional)  |  |  |
| staff me                           | ons: A mental health professional must complete this in the may participate, if warranted. The purpose of this and others. Therefore, this interview has two objectives.   | is interview is to maintain th  |  |  |  |
| <ol> <li>1)</li> <li>2)</li> </ol> | Intervention and/or referral needs. Assess the student urgent mental health needs that require attention, such these immediate needs, consider whether there are oth Threat reduction. Gather information on the student understand why the threat was made and identify relevance the risk of violence. | ch as risk of suicide, homicia<br>er referral or support needs.<br>'s motives and intentions in | de, psychosis, or rage. Beyond making the threat in order to |  |  |
| either m<br>Conside                | begin by attempting to establish rapport, then use these nade a threat or exhibited a behavior of concern. Try to the the developmental level of the student and adjust this, as appropriate.  | o use open-ended questions  | rather than leading questions.                               |  |  |
| RAPPO                              | ORT BUILDING AND INTERVIEW INTRODU   | JCTION  |  |  |  |
| 1. Wh                              | at is your understanding of why you have been asked  | ed to meet with me?   |  |  |  |
| 2. We                              | are concerned about behavior that has been reporte   | ed. What's your side of it?   |  |  |  |
| 3. Wh                              | at is your understanding of why the adults at school   | I are concerned?  |  |  |  |

### **CLINICAL STUDENT INTERVIEW (Page 2 of 11)**

In order to help me better understand this situation and be able to help you, I am going to ask you some more questions.

### **REVIEW OF THREAT**

| 1. | What happened that made others worried that you wanted to harm someone? What exactly did you say or do that made them worried? What did you mean by that? |
|----|---|
| 2. | I know you must have had reasons to say (or do) that, can you explain what led up to it?  |
| 3. | How would you do it (carry out the threat)? (Probe for details of any planning or preparation.) Where did the idea come from?                             |
| 4. | What could happen that would make you want to do it (carry out the threat)?   |
| 5. | What would happen if you did do it? (Review both effects on intended victims and consequences for student.)   |
| 6. | What do you think the school should do in a situation in which a person makes a threat like this?   |
| 7. | What were you feeling then? How do you feel now?  |
| 8. | How do you think (the person threatened) felt?  |
|    |   |

# CLINICAL STUDENT INTERVIEW (Page 3 of 11)

### RELATIONSHIP WITH INTENDED VICTIM(S)

| 1. | How long have you known this person?   |
|----|--|
| 2. | What has happened in the past between you and this person?   |
| 3. | What do you think this person deserves?  |
| 4. | Do you see any way that things could be improved between you and this person?  |
| FA | MILY SUPPORT   |
| 1. | Whom do you live with? Are there family members you don't live with? Have there been any changes in the past year?                               |
| 2. | Whom in your home are you close to?  |
| 3. | How well do your parents/guardians know you?   |
| 4. | Where do you go after school? Where are your parents/guardians at this time? How much do they keep track of where you are or what you are doing? |
|    |  |

# **CLINICAL STUDENT INTERVIEW (Page 4 of 11)**

| 5. | How strict are your parents/guardians? What do they do if you do something they don't want you to do? When was the last time you got in trouble with them? What was the worst time? |
|----|---|
| 6. | How will your parents/guardians react (or how did they react) when they find out about this situation?  |
| ST | TRESS AND TRAUMA  |
| 1. | What kinds of things have been going on with you lately? What sorts of things have you worried about?   |
| 2. | How has your school work been going lately? Are there things you have been worried about with your school work? Other things at school?   |
| 3. | What is the worst thing that has happened to you lately? Have any other bad things happened? Is there something you regret or wish you could change?                                |
| 4. | Have there been any changes in your family? Has anyone been sick, moved away, or had anything bad happen to them?   |
| 5. | Do you have family members in jail or prison?   |
| 6. | Do you take any medication?   |
| 7. | Have you been involved in any counseling?   |

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# **CLINICAL STUDENT INTERVIEW (Page 5 of 11)**

### **MOOD**

| 1.                 | What has your mood been like the past few weeks? Have you felt down or depressed at times? How bad has it been? (Be alert for statements of pessimism and hopelessness that might indicate suicide risk. If there are indications of suicidal thoughts or feelings, there should be a more extensive evaluation of suicide risk. If necessary, develop a plan for protecting the student and making appropriate referrals.) |
|--------------------|---|
| 2.                 | Have you felt nervous or anxious? Irritable or short-tempered? How bad has it been?   |
| 3.                 | Have you felt like life wasn't worth living? Like maybe you would kill yourself?  |
| 4.                 | Have you ever done something to hurt yourself on purpose? Ever cut yourself on purpose?   |
| 5.                 | Have you had any problems with your sleep? Appetite? Energy level? Concentration?   |
| 6.                 | Have you been taking any medication to help with your mood or for any other reason?   |
| PSYCHOTIC SYMPTOMS |   |
|                    | k a few probe questions and follow up if there is any indication of delusions or hallucinations. Phrase questions<br>propriate to the student's age and understanding.  |
| 1.                 | Have you had any unusual experiences lately, such as hearing things that others cannot hear or seeing things that others cannot see?  |
|                    |   |
|                    |   |

# **CLINICAL STUDENT INTERVIEW (Page 6 of 11)**

| 2.         | Have you felt like someone was out to get you or wanted to harm you? Have you had any other fears that seem strange or out of the ordinary?        |
|------------|--|
| 3.         | Do you have any abilities or powers that others do not have, such as ESP or reading minds?   |
| 4.         | Have you felt numb or disconnected from the world, or like you were somehow outside your body?   |
| No         | te and enquire about any other symptom of mental disorder.   |
| W          | EAPONS   |
| Ask        | about any weapons mentioned in the threat. As an example, these questions concern a threat made to stab someone.                                   |
| 1.         | You said you were going to stab (name of victim). What were you going to stab him with?  |
| 2.         | Do you have a knife? What kind of a knife is it? (Or how would you get a knife?)   |
| 3.         | Have you ever had to use a knife with someone? What happened?  |
| 4.         | What do you think would happen if you did use a knife with (name of victim)?   |
| <b>A</b> ( | CCESS TO FIREARMS  |
|            | k about firearms in all cases, even if no firearm was mentioned. If the threat involved a knife, bomb, or other weapon,<br>about that weapon, too. |
| 1.         | Do you have a gun?   |

# **CLINICAL STUDENT INTERVIEW (Page 7 of 11)**

| 2.         | Are there guns in your home? Have you ever used a gun for hunting or target shooting?  |  |
|------------|--|--|
| 3.         | If you wanted a fun, how would you get one?  |  |
| 4.         | What do you think you might do if you had a gun?   |  |
| 5.         | Have you ever had to use a gun with someone? Have you ever thought about using a gun with someone?   |  |
| <b>A</b> ( | AGGRESSIVE BEHAVIOR  |  |
| 1.         | Do people treat you fairly? Who has been unfair with you lately? When people treat you unfairly, what do you do about it?                    |  |
| 2.         | When you get angry, what do you do? Has your temper ever gotten you into trouble?  |  |
| 3.         | Do you get into fights? When was the last time? What happened?   |  |
| 4.         | Have you ever threatened to harm anyone before?  |  |
| 5.         | Have you thought about what it would be like to hurt someone really bad? Have you written any stories or made any drawings that are violent? |  |
|            |  |  |

# **CLINICAL STUDENT INTERVIEW (Page 8 of 11)**

| 6.                  | Have you ever set fire to things?   |
|---------------------|---|
| 7.                  | Have you damaged your own property or someone else's property?              |
| 8.                  | Have you ever intentionally hurt an animal?                                 |
| SC                  | HOOL DISCIPLINE   |
| 1.                  | When was the last time you got into trouble in school? What happened?       |
| 2.                  | Have you ever been suspended or expelled?                                   |
| 3.                  | Have your parents ever been called to school because of your behavior?      |
| 4.                  | Do you ever cut school or certain classes?                                  |
| 5.                  | Do you feel that the rules at this school are fair? What has been unfair?   |
| DELINQUENT BEHAVIOR |   |
|                     | Have you been in trouble with the law or with police before? What happened? |
|                     | y   |

# **CLINICAL STUDENT INTERVIEW (Page 9 of 11)**

| 2. | Have you ever gone to juvenile court? What was it about?   |
|----|--|
| 3. | Have you done things that could have gotten you arrested or in trouble with the law? What was the wors thing? What else?         |
| 4. | Do you ever drink beer, wine, or other alcohol? Have you ever? How often do you drink? When was the last time? Tell me about it. |
| 5. | Do you smoke marijuana? Have you ever? How often? When was the last time?  |
| 6. | Have you used any other drugs? How often? When was the last time? Tell me about it.  |
|    | EXPOSURE TO VIOLENCE   |
| 1. | Do you see or hear of violence in your neighborhood?   |
| 2. | Do you know anyone who was shot, stabbed, or beat up real bad?   |
| 3. | Do people argue much at home? Does anyone get physically aggressive?   |
| 4. | What kind of movies do you like? What kind of video games do you enjoy playing? What are your favorite internet sites?           |

# **CLINICAL STUDENT INTERVIEW (Page 10 of 11)**

| 5.  | Ask the student about his/her reactions to recent acts of violence or to any highly publicized school shootings.  |
|-----|---|
| BU  | ULLYING   |
| thr | llying is broadly defined and may include teasing, social exclusion, or other forms of humiliation in addition to physical eats of violence. The student may not use the term "bully," and may be reluctant to admit to being the victim of bullying pavior, so be prepared to rephrase questions and probe for victim experiences. |
| 1.  | Is there anyone who has threatened you recently? Is there anyone who makes you feel afraid? (Ask about sexual threats if appropriate to situation.)   |
| 2.  | Is there anyone who has teased you or picked on your recently? Is there anyone who has beat you up or pushed you around? How about at home?   |
|     | In response to any positive answer, follow up for more information: How often does it happen? What have you tried to do about it? Did you let any adult know about this, and if so, what happened?  |
|     | alert to statements indicating that a bullied student feels there is no solution to the problem or is contemplating revenge.  ER RELATIONS  |
|     | What are your friends like? Have you had any trouble with your friends lately? Who is your best friend?   |
| 2.  | How would your friends describe you?  |
| 3.  | Do you have a boyfriend/girlfriend? (Keep in mind that the student might not be heterosexual, and there may be concerns in this area.) How are things going with him/her? Did you have one before? What happened to the relationship?   |
| 4.  | Do you have friends who get in trouble?   |

# **CLINICAL STUDENT INTERVIEW (Page 11 of 11)**

| ne who feels                 |
|------------------------------|
|                              |
|                              |
|                              |
|                              |
| em that you<br>able to solve |
|                              |
|                              |
| , AND/OR<br>HOULD BE         |
|                              |

# **APPENDIX K: BTA Monitoring Plan**

Forms are to be entered into EdPlan. If printed forms are utilized, the information must be entered or uploaded as an attached source into EdPlan.

### **MONITORING PLAN (Page 1 of 2)**

Student ID:

Grade:

| Scn  | ooi Name: Date:  |
|--|--|
| to constantiation to constanti | ections: Once the BTA and SSP have been finalized, the team is required to schedule a meeting within 72 hours reate and finalize a Monitoring Plan for Serious/Very Serious Substantive threat levels. The Monitoring Plan for on-going monitoring of support/services. The level of supervision provided to the student should be sistent with the nature and seriousness of the threat. Through the Monitoring Plan, the team identifies any sons that require continued implementation and monitoring. This includes any further actions to be taken with student who made the threat or displayed concerning behavior. The team will also identify any actions to be in with potential victims of the threat and/or any students impacted by the threat. The Monitoring Plan can include documentation of any disciplinary actions taken, if applicable. Maintain documentation (e.g., logs, to for all actions selected on the Monitoring Plan. |
| DIS  | CIPLINARY ACTIONS  |
| Des<br>Stud  | dent Suspended? Circle One: Yes No cribe: dent recommended for further disciplinary action and/or consideration? Circle One: Yes No cribe:   |
|  | RTHER ACTIONS  ion(s) with Student Making the Threat (Check all that apply):   |
|  | Assign a mentor. Mentor Name:  |
|  | Refer for school-based counseling. Identify focus and name/position of person providing counseling:  |
|  | Daily or weekly check-in. Identify focus and name/position of person providing counseling:   |
|  | Backpack, coat, and other belongings being checked in/out. Describe and include person responsible:  |
|  | Increased supervision in specific settings. Identify settings:   |

Student Name:

### **MONITORING PLAN (Page 2 of 2)**

All of the actions selected above shall be reviewed with the following individuals who did not participate in the development meeting for this monitoring plan. List names and titles of individuals: Name: Title: Refer to school-based community provider. Please indicate date of referral and name of organization: ☐ Baker Act. ☐ Contact the legal guardian. ☐ Meeting with family. Action(s) with potential victim(s) of the threat or students impacted by the threat (Check all that apply): ☐ Communicated with victim(s) and parent(s) or guardian(s)? Indicate date and by whom below: ☐ Provided brief supportive counseling? Indicate date and by whom below: ☐ Alter schedule to minimize contact with student who made threat. Person responsible: \_\_\_\_\_ ☐ School-based staff to monitor student at regular intervals. Name of staff member who will monitor: ☐ Other Actions. Please describe below: MEETING PARTICIPANTS Please list names and titles of all individuals who participated in the development of the Monitoring Plan: Name: Title: Signature: The BTA team **must** reconvene every 30 school days (or earlier, if warranted) from the development of the initial Monitoring Plan for review and modifications. Upon review of a student's Monitoring Plan, the team must determine whether to: 1) Continue Monitoring Plan with revisions, 2) Continue Monitoring Plan with no revisions, 3) Close Monitoring Plan.

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Anticipated Review Date: \_\_\_\_\_

### **District Resources & Contact Information**

For the most current version of this manual and other current mental health resources, please use the *BCPS Mental Health Portal* located at:

http://browardschools.com/mentalhealth

For assistance with EdPlan BTA Technical Support:

Use "Send Us a Message" button on EdPlan

Electronic Management System (754) 321-3400 #2

For assistance with *BTA district procedures*:

Psychological Services (754) 321-3440

For assistance with *school violence prevention*:

Psychological Services (754) 321-3440

School Climate & Discipline (754) 321-1655

For assistance with FERPA Concerns/Questions:

**SBBC Privacy Office** (754) 321-1914

For assistance with *DMS/discipline*:

School Climate & Discipline (754) 321-1655

For assistance with SRA/suicide prevention, Baker Acts, SEDNET referrals, and community mental health providers:

**SEDNET** (754) 321-3421

For assistance with SEL and counseling services:

**Family Counseling** (754) 321-1590

**School Counseling** (754) 321-1675

For assistance with *substance abuse prevention*:

School Climate & Discipline (754) 321-1655

For guidance regarding school safety:

Special Investigative Unit (SIU School Police) (754) 321-0930

Safety, Security and Emergency Preparedness: (754) 321-2655

RSM US LLP 100 NE 3<sup>rd</sup> Ave Suite 300 Ft. Lauderdale, Florida 33301 (954) 462-6300 www.rsmus.com

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