



# Broward County Public Schools, Florida Compliance Audit – Threat Assessment Procedures



December 7, 2018

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December 7, 2018

Mr. Daniel Gohl  
Chief Academic Officer  
Broward County Public Schools  
Fort Lauderdale, FL

Pursuant to our Statement of Work, we hereby submit the results of our compliance audit for the Broward County Public Schools (“BCPS”, “District”) Threat Assessment Procedures. Our audit focused on the required documentation as outlined in the “Threat Assessment Procedures Manual - 2017” and additional information provided in interviews with select BCPS Administrators.

### Scope and Methodology

We held a kickoff meeting with leadership and met with representatives from the District’s Office of Academics team on August 8, 2018, to gain an understanding of the threat assessment process, and discuss the scope and objectives of our compliance audit. The focus of the compliance testing was to determine if the required forms were: 1) present, 2) substantially complete, and 3) completed/signed by the appropriate member of BCPS if applicable. *RSM did not test for appropriateness of the content of the documents or the District’s threat assessment process.* From these meetings, we created a list of documents needed for our testing and worked with District staff to correspond with the schools to obtain the necessary documentation.

We judgmentally selected a representative sample of 60 threats to test from a population of 642 threat assessments within the Total Educational Resource Management System (“TERMS”), which included identified threats from September 1, 2015 through June 30, 2018. Samples selected for review were from 54 out of 89 schools that had a threat assessment conducted during our sampling period. Out of the 60 samples sampled, we received documentation supporting 46 of the selected sample. Thus, we did not receive supporting documentation for 23% of the sample selected. Our selection sampling methodology is outlined on page 3. 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.

	<b>Total Sampled</b>	<b>Low Risk</b>	<b>Medium Risk</b>	<b>High Risk</b>	<b>Unknown Risk</b>	<b>No Information Provided</b>
<i>Elementary Schools</i>	17	10	4	1	0	2
<i>Middle Schools</i>	23	5	3	5	1	9
<i>High Schools</i>	14	2	6	5	0	1
<i>Other</i>	6	4	0	0	0	2
<i>Totals</i>	60	21	13	11	1	14
<i>Percent of Sample</i>		35%	22%	18%	2%	23%
<i>Percent of Testing (46 threats)</i>		46%	28%	24%	2%	n/a

## Results

Of the 46 samples we received with documentation for testing, 16 or 35%, of the threats had supporting documentation that was substantially complete and included the appropriate signatures. The remaining 65% included exceptions. The below is a high-level analysis of the results of our testing:

<b>By Risk Level</b>	<ul style="list-style-type: none"> <li>Low Risk: The low risk threats represent 46% of the sample tested. There were exceptions noted for 7, or 33%, of the 21 low risk threats tested. The remaining 14 low risk threats tested had supporting documentation, which was substantially complete and included the appropriate signatures.</li> <li>Medium Risk: There were exceptions noted for 12, or 92%, of the 13 medium risk threats tested. Thus, 8% of the threats tested had no exceptions.</li> <li>High Risk: There were exceptions noted for 10, or 90%, of the 11 high risk threats tested. Thus, 10% of the threats tested had no exceptions.</li> </ul>
<b>By Type of School</b>	<ul style="list-style-type: none"> <li>Elementary Schools: There were exceptions noted for 7, or 47%, of the 15 threats tested. Thus, 53% of the threats tested had no exceptions.</li> <li>Middle Schools: There were exceptions noted for 9, or 64%, of the 14 threats tested. Thus, 36% of the threats tested had no exceptions.</li> <li>High Schools: There were exceptions noted for 11, or 85%, of the 13 threats tested. Thus, 15% of the threats tested had no exceptions.</li> <li>Other: There were exceptions noted for 2, or 50%, of the 4 threats tested. Thus, 50% of the threats tested had no exceptions.</li> </ul> <p>Of the threat assessments selected for sampling, we did not receive documentation for 14, or 23%, out of 60 threat assessments sampled. The breakdown by type of school is as follows: 12% from the Elementary School threats sampled, 39% from the Middle School threats sampled, 7% from the High School threats sampled, and 33% from Other threats sampled.</p>
<b>For the Initial Response Process</b>	<p>Initial Response Process as outlined by the “Threat Assessment Procedures Manual – 2017” resulted in exceptions in 20, or 43%, of the threats tested. The breakdown by type of school is as follows:</p> <ul style="list-style-type: none"> <li>Elementary Schools: There were exceptions noted for 5, or 33%, of the 15 threats tested.</li> <li>Middle Schools: There were exceptions noted for 5, or 35%, of the 14 threats tested.</li> <li>High Schools: There were exceptions noted for 9, or 69%, of the 13 threats tested.</li> <li>Other: There were exceptions noted for 1, or 25%, of the 4 threats tested.</li> </ul>
<b>For the Level 1 Screening</b>	<p>Level 1 Screening as outlined by the “Threat Assessment Procedures Manual – 2017” resulted in exceptions in 22, or 85%, of the 26 Level 1 threats tested. The breakdown by type of school is as follows:</p> <ul style="list-style-type: none"> <li>Elementary Schools: There were exceptions noted for 5, or 83%, of the 6 Level 1 threats tested.</li> <li>Middle Schools: There were exceptions noted for 7, or 77%, of the 9 Level 1 threats tested.</li> <li>High Schools: There were exceptions noted for 9, or 82%, of the 11 Level 1 threats tested.</li> <li>Other: There were exceptions noted for 1, or 50%, of the 2 Level 1 threat tested.</li> </ul>
<b>For the Level 2 In-Depth Assessment</b>	<p>Level 2 In-Depth Assessment as outlined by the “Threat Assessment Procedures Manual – 2017” resulted in exceptions in 14, or 93%, of the 15 Level 2 threats tested.</p>

The detailed results are included as an Appendix in this report.

## Observations

While we were not requested to develop formalized reportable observations, we did note the following opportunities for improvement that could improve program compliance results as it relates to the District's Threat Assessment process:

- The existing process is extremely paper driven. An electronic system could improve availability and completeness of documentation, version control, and streamline the process.
- Currently there is no formalized process to follow-up and monitor the Threat Assessment process to assess that documents are fully completed and that follow-up as indicated in student plans occurs.

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

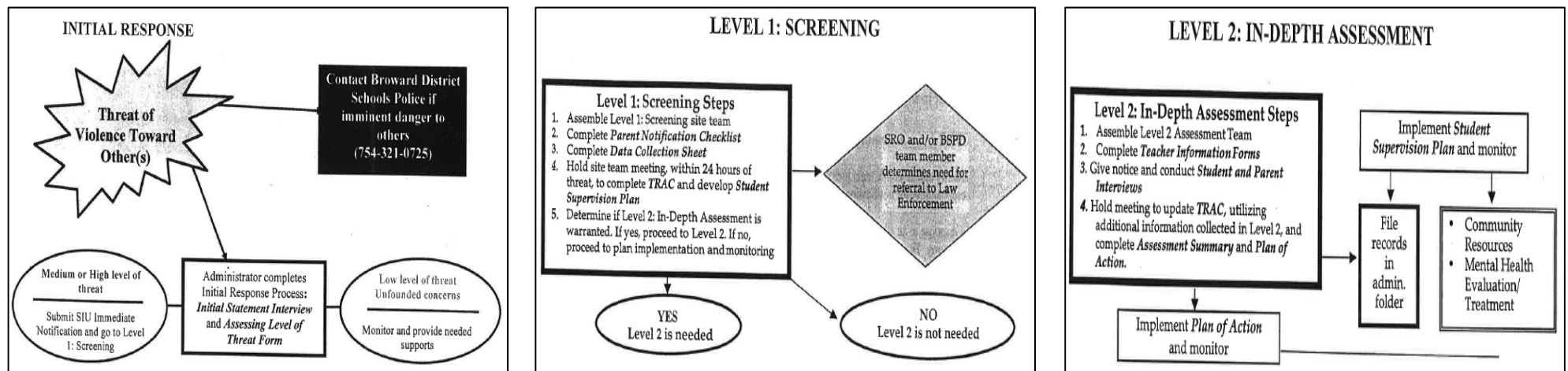
Respectfully,

## BACKGROUND

Broward County Public Schools has a formal Threat Assessment Process with a mandated set of procedures for violence prevention and threat assessment. It was initially instituted in 2002, with updates to the manual in subsequent years. The last revision was published in 2017 with updated contact information.

Training is conducted several times each year to provide instruction on recognizing advance signs of threat and how to handle a perceived threat. While there are support services to assist schools in the process (e.g. Psychological Services), each school in the District is responsible for overseeing the process and maintaining the records that are produced. The individual threat scenario will determine who is involved in the process and specific documentation to be completed.

When an event occurs, there is a defined protocol as outlined below in the flowcharts and in the detailed "Threat Assessment Procedures Manual – 2017. The initial response is handled by a school administrator, generally a Principal or Assistant Principal. Should a threat be deemed a medium or high threat, a team is assembled to conduct a Level 1 Screening and to determine if a Level 2: In Depth Assessment is warranted. A Level 1 Screening team is school based and a Level 2 In-Depth Assessment team includes the Level 1 team members with additional focus on mental health. The threat assessment process specifically identifies required forms, actions, protocol and the identified parties responsible.



Process maps are from the Threat Assessment Procedures Manual

## TEST SAMPLE SELECTION METHODOLOGY

The threat assessment population was provided by the District and generated from TERMS. RSM did not test the completeness of the population. The sample was selected from the population provided. A total of 642 threats were reported by school based administrators for the following school years:

- 2015-2016
- 2016-2017
- 2017-2018

Threats are recorded in TERMS as a 208 (School Safety Level 1 Screening) or 209 (School Safety Level 2 Assessment). Per the “Assessing Level of Threat Checklist” threat assessment levels are ultimately determined to be a low, medium or high from specific criteria listed on the checklist. An Administrator who may include additional school based personnel initially investigates the threat, completes the paperwork, and determines the level for the corresponding next steps.

A sample of sixty (60) threats were chosen from this population. Eighty-nine (89) traditional and alternative schools were included in the population, including charter schools. If no threats were reported during this reporting period, that school was not included in the population, and therefore not included in the sample statistics.

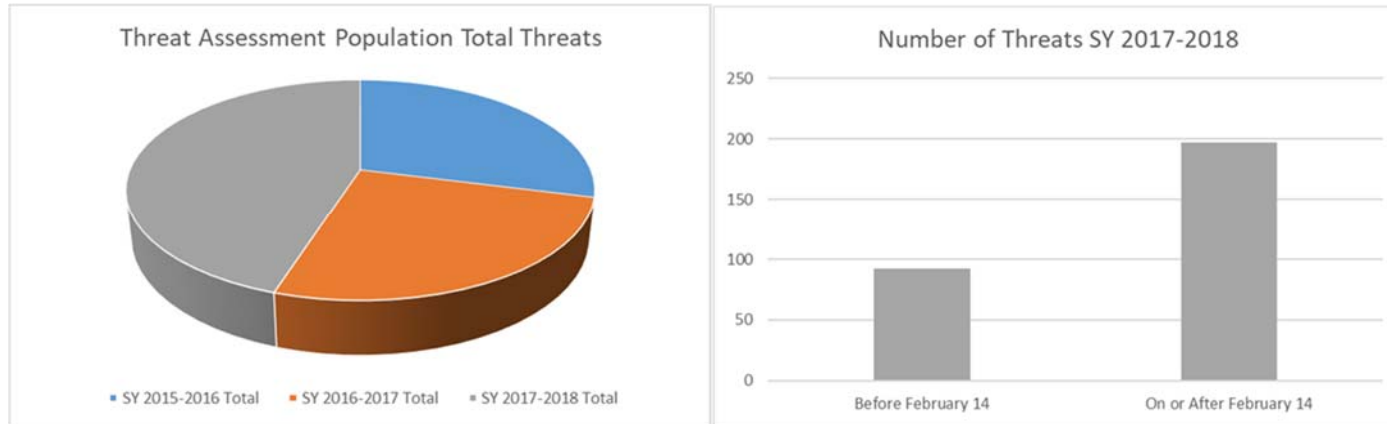
The sample was selected so that it is representative of the population of identified threats. Our methodology was to include at least one (1) sample from each school; however, not all schools had threats reported. Because the total number of schools exceeded the sample size of 60, we chose samples from across geography throughout the District. The table below shows the makeup of the population and the selected sample.

School Type	Threat Assessment Population Totals			% of Threat Assessment Population	# of Schools	% of School Type from Population	Sample		
	208	209	Total				208	209	Total
Elementary School	169	11	180	28%	32	36%	16	1	17
Middle School	194	54	248	39%	20	22%	18	5	23
High School	112	36	148	23%	22	25%	10	3	14
Other/Alternative	53	13	66	10%	15	17%	5	1	6
<b>Grand Total</b>	<b>528</b>	<b>114</b>	<b>642</b>	<b>100%</b>	<b>89</b>	<b>100%</b>	<b>49</b>	<b>11</b>	<b>60</b>

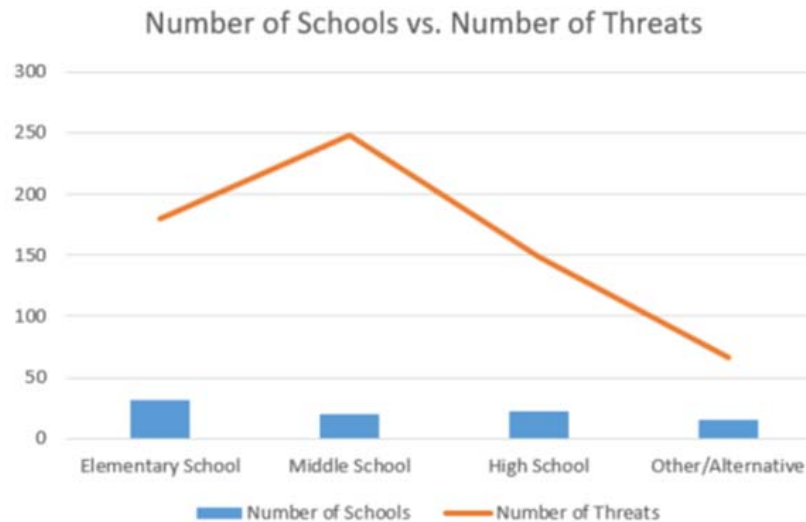
## TEST SAMPLE SELECTION METHODOLOGY - CONTINUED

We noted the following through our analysis of the threat population:

- 1) The threat assessment population increased significantly in school year ("SY") 2018:
  - 2015-2016 SY had 186 threats
  - 2016-2017 SY had 167 threats
  - 2017-2018 SY had 289 threats



- 2) Middle schools had a lower percentage of school type population, 22% (20 schools reporting out of 89 schools). However, it had the highest number of incidents reported, 39% (248 out of 642 total in the sample population). This indicates a higher volume per middle school out of the sample population.





## SCOPE OF WORK

The scope of this compliance audit began once a threat was identified in the system, and included identified threats from September 1, 2015 through June 30, 2018. The focus of the compliance testing was to determine if the required forms were: 1) present, 2) substantially complete, and 3) completed/signed by the appropriate member of BCPS if applicable. *RSM did not test for appropriateness of the content of the documents or the District's threat assessment process.*

Our approach to the compliance audit execution consisted of the following phases:

### **Understanding and Documentation of the Process**

During this phase, we conducted an entrance conference on August 8, 2018, with BCPS Office of Academics to discuss the scope and objectives of the audit work, obtain preliminary data, and establish working arrangements. This included enhancing our current understanding of the process obtained during initial scoping/discovery as well as to further document the process and compliance requirements. We reviewed applicable BCPS procedures and documentation, including the "Threat Assessment Procedures Manual – 2017", training aids and threat notifications to raise awareness of the process. We also performed walkthroughs of the process to validate our understanding.

### **Detailed Testing**

The purpose of this phase was to test compliance with the BCPS threat assessment procedures. Our fieldwork testing was conducted utilizing sampling and other auditing techniques to meet our objectives. We performed our procedures on a representative sample of 60 identified threats. The sample was selected so that it is representative of the population of identified threats using key data points made available to us by the District. We reviewed and inspected threat assessment files and available documentation to determine if the required forms were: 1) present, 2) substantially complete, and 3) completed/signed by the appropriate member of BCPS if applicable. *RSM did not test for appropriateness of the content of the documents or the District's threat assessment process.*

Attributes		
Initial Response Process	1	Was the Threat Related Initial Statement Interview Guide present?
	2	Was the Threat Related Initial Statement Interview Guide substantially completed?
	3	Was the Threat Related Initial Statement Interview Guide completed by an administrator?
	4	Was the Assessing Level of Threat Checklist/Form present?
	5	Was the Assessing Level of Threat Checklist/Form completed by an administrator?
	6	Was the Assessing Level of Threat Checklist/Form substantially completed?
	7	Was SIU notified?

## SCOPE OF WORK - CONTINUED

### Detailed Testing - continued

Attributes - continued		
Level 1 Screening	8	Was a screening site team convened within 24 hours
	9	Was the Level 1 Threat Assessment Screening Protocol (Parent Notification Checklist) present?
	10	Was the Level 1 Threat Assessment Screening Protocol (Parent Notification Checklist) substantially completed?
	11	Was the Level 1 Threat Screening Protocol Data Collection Sheet present?
	12	Was the Level 1 Threat Screening Protocol Data Collection Sheet substantially completed?
	13	Was TRAC form present?
	14	Was TRAC form substantially completed?
	15	Was the Student Supervision Plan present?
	16	Was the Student Supervision Plan substantially completed?
	17	Was the Student Supervision Plan signed as required?
	18	Was the Student Supervision Plan Review Form present?
	19	Was the Student Supervision Plan Review Form substantially completed?
	20	Was the Student Supervision Plan Review Form signed as required?
Level 2 In-Depth Assessment	21	Was the Student Supervision Plan of Action Review Form completed within two weeks
	22	Was a Level 2 Assessment Team assembled per guidelines
	23	Was the Level 2 Threat Assessment Student Interview present?
	24	Was the Level 2 Threat Assessment Student Interview substantially completed?
	25	Was the student interview conducted by a school district mental health professional?
	26	Was TRAC updated from information gathered collected in level 2
	27	Was the Level 2 Teacher Information Forms present?
	28	Was Level 2 Teacher Information Form substantially completed?
	29	Was the Level 2 Threat Assessment Parent Interview present?
	30	Was the Level 2 Threat Assessment Parent Interview substantially completed?
	31	Was the Level 2 Threat Assessment Parent Interview conducted by a school district mental health professional?
	32	Is the Level 2 Assessment Summary and Plan of Action present?
	33	Is the Level 2 Assessment Summary and Plan of Action substantially completed?
	34	Was the Level 2 Assessment Summary and Plan of Action signed as required?
	35	Was the Level 2 Plan of Action Review Form present?
	36	Was the Level 2 Plan of Action Review Form substantially complete?
	37	Was the Level 2 Plan of Action Review Form signed as required?

### Reporting/Deliverable

During this phase, we summarized and reviewed the results of this audit with appropriate members of BCPS Psychological Services and the Chief Academic Officer.

## RESULTS

Out of the 60 samples sampled, we received documentation supporting 46 of the selected sample. Thus, we did not receive supporting documentation for 23% of the sample selected. For the remaining 14 threats, these were categorized as did not respond (“DNR”) in the results spreadsheet in grey – see Appendix. Of the 46 threats, we noted the following:

<b><i>Elementary Schools – Received documentation for 15, or 88%, of the 17 selected for testing.</i></b>
There were exceptions noted for 3, or 30%, of the 10 low risk threats tested. Thus, 70% of the low risk threats tested had no exceptions.
There were exceptions noted for 3, or 75%, of the 4 medium risk threats tested. Two of the 3 with exceptions were missing follow-up documentation and 1 of the 3 was missing 18 required documents. One (1), or 25% of the medium risk threats tested had no exceptions; Quiet Waters had completed all of the required documentation.
There were exceptions noted for 1, or 100%, of the 1 high risk threat tested. This threat was missing all required documentation for the Level 1 screening and a significant portion of the Level 2 in-depth assessment.
The risk level was unknown for one (1) threat tested, therefore, we were unable to validate compliance procedures for that threat. Supporting documentation was limited.
We did not receive supporting documentation for 2, or 12%, of the elementary school threats selected for testing.

<b><i>Middle Schools – Received documentation for 14, or 61%, of the 23 selected for testing.</i></b>
There were exceptions noted for 1, or 20%, of the 5 low risk threats tested. Thus, 80% of the low risk threats tested had no exceptions.
There were exceptions noted for 3, or 100%, of the 3 medium risk threats tested. Two of the 3 schools completed Student Supervision Plans. However, none of the schools performed follow-up on the plans.
There were exceptions noted for 4, or 80%, of the 5 high risk threats tested. Four of the 5 schools properly completed the initial response process and Student Supervision Plans. Three of the 4 with exceptions were missing follow-up documentation. For 1 of the 5 with exceptions, a portion of the required documentation was missing for Level 2 in-depth assessment documentation was not completed.
The risk level was unknown for one (1) threat tested, therefore, we were unable to validate compliance procedures for that threat. Supporting documentation was limited; however, a Student Supervision Plan was completed and follow up on the plan was documented.
We did not receive supporting documentation for 9, or 39%, of the middle school threats selected for testing.

## RESULTS - CONTINUED

### ***High Schools – Received documentation for 13, or 93%, of the 14 selected for testing.***

There were exceptions noted for 1, or 50%, of the 2 low risk threats tested. Thus, 50% of the low risk threats tested had no exceptions. One (1) school completed all the required forms and the other was missing the Assessing Level of Threat Checklist form.

There were exceptions noted for all 6, or 100%, of the medium risk threats tested. Two of the schools completed the initial response process documentation, 1 school completed none of the required forms, and the other 3 had exceptions. Only 1 school completed all of the required Level 1 screening documents. The other 4 were missing a significant amount of required documents. Three (3) of the schools moved to the Level 2 in-depth assessment and the other 3 were not required to complete that process. Two (2) of those schools completed the necessary Assessment Summary and Plan of Action and follow-up was documented.

There were exceptions noted for all 5, or 100%, of the high risk threats tested. One (1) school did not complete any of the required documentation. The other 4 schools completed all the initial responses except 1 form was not complete. The Level 1 screening included 3 Student Action Plans and a Level 2 in-depth assessment included follow-up for 1 threat. A portion of the Level 2 in-depth assessment documentation was not completed.

We did not receive supporting documentation for 1, or 7%, of the high school threats selected for testing.

### ***Other – Received documentation for 4, or 67%, of the 6 selected for testing.***

There were exceptions noted for 1, or 33%, of the 3 low risk threats tested. Thus, 67% of the low risk threats tested had no exceptions.

There were exceptions noted for the 1, or 100%, high risk threat tested. This threat had a significant amount of documentation and included a substantially complete Student Supervision Plan for Level 1 screening and a Level 2 in-depth assessment summary and Plan of Action. Follow-up documentation was provided for both threat levels.

We did not receive supporting documentation for 2, or 33%, of the other threats selected for testing.





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