

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

August 3, 2021



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TRANSMITTAL LETTER

August 3, 2021

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Pursuant to the approved Statement of Work dated April 7, 2020, 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. Our compliance audit focused on the required documentation as per the "Behavioral Threat Assessment Procedures Manual v.8/21/2019" and the Threat Assessment Policy 2130 related to assessing threats that are formally identified by BCPS in their system, EdPlan. The objectives of our testing was 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.*

COVID-19 was declared a pandemic in March 2020 by the World Health Organization. The District's last in-school and in-office day was March 13, 2020. Students did not physically return to school for the remainder of the school year. The first day of at-home learning was March 30, 2020. The District's employees worked remotely during these times. Due to the timing of emergency remote learning and working environment, some of our testing sample selections may have been impacted, resulting in observations. Audit fieldwork was extended as Management's priorities shifted due to COVID-19 protocols and the EdPlan system updates throughout 2020.

Scope and Methodology

We held a kickoff meeting with representatives from the District's Office of Academics team and Internal Audit on April 14, 2020, to gain an understanding of the threat assessment process, with an emphasis on the updates to the process since our original audit. We held an onsite walkthrough with management to observe a live demonstration of the newly 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 875 threat assessments out of EdPlan from December 2019 through March 2020. Internal Audit requested that we remove Charter Schools and duplicate system entries from the population we received, as well as having the sample be inclusive of all high and medium-level threats. Per Internal Audit's direction, we judgmentally selected a sample of 200 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.



Scope and Methodology - Continued

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.

	Final - Samples Selected and Tested by School Type and Threat Level				
School Type	High/Very Serious	Medium/Serious	Low/Transient	Unfounded/No Threat	Totals
High School	11	33	8	7	59
Middle School	7	29	6	6	48
Elementary School	1	42	3	2	48
Centers	24	18	2	1	45
Totals	43	122	19	16	200

Our sample was selected with a specific focus on the medium and high-level risk threats, as requested by Internal Audit. The 37 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.

Results

There are 37 attributes that were tested within the 200 threats sampled. A detailed listing of the results are included in the "Detailed Observations and Related District Staff Response" section of this report.

As noted in **Observation #1**, through preliminary reviews of the 2021 school year's 75 threat assessment samples that were tested, the Student Risk Intake Form attributes 1&3 in the 'Attributes Tested' section of this report, no exceptions were noted.

We would like to thank all those who assisted us in this compliance audit of Threat Assessment 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 2019 Behavioral Threat Assessment (BTA) procedures manual, which became effective August 21, 2019. The new process was implemented prior to the start of the 2019-2020 school year.

Since the implementation of EdPlan, there have been several internal trainings and updates to the system, beginning in October 2019. Further updates followed: December 2019, March 2020, June 2020, August 2020, and December 2020. These systematic updates improved processes and corrected known system glitches. The system updates are summarized in the table below.

December 2019	March 2020	June 2020	August 2020	December 2020
Integrated the Student Risk Intake Form into the overall Threat Assessment process Optional check box was added next to the student interview for the user to indicate "Student not available for interview at this time"	 Adding and changing verbiage Trigger alerts Adding Dashboard color codes by priority threat levels 	 Adding and editing user access Adding the ability to set a school-based core BTA team that would automatically populate that school's team for each student Ability to delete draft documents Adding additional dashboard updates 	 When a Student Risk Intake Form is finalized, a threat assessment is generated For both the BTA and monitoring plans, a drop down was added for "participation type" regarding the meeting participants, which includes the following three options: In Person, Invited-Did Not Attend, Virtual Format (Zoom/Teams) For the monitoring plans, a new panel was added, "Previous Continuing Actions", which allows the user to see the outcomes of any previous reviews to the Monitoring Plan Adding and editing user access Adding new landing page Various dashboard updates 	Changes made to the school profile form for the core BTA and core Suicide Risk Assessment (SRA) teams automatically update the school's core team pages when a new School Profile Form (SPF) is finalized for a school



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 Assessment 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 24 hours. The countdown starts as soon as the Administrator is aware of the incident.

After a threat is reported to Administrator:

- Administrator or delegate 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.
- Clinical Parent & Student interviews must be performed by a professional (counselor, specialist, psychologist, etc.) for all medium and high level threats.
- Review prior behavioral/discipline, ESE, 504, or gifted history
- Review academic/attendance History
- Review artwork, social media, classwork, etc.

- -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 BTA Part 2-Data Collection BTA Part 3 – Analysis, Risk Level, and Student Support Plan

Monitoring Plan (High & Medium threats)

gh & Follow Up, if applicable s)

- 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 before the incident occurred.
- The BTA team must be assigned (Administrators, Teachers, Counselors, Mental Health Specialists, Law Enforcement, etc.)

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

-The BTA team must reconvene every 30 school days from the initial Monitoring Plan for review and Modification. Internal Audit Report Issued: August 3, 2021



OBJECTIVES AND APPROACH

Objectives

Our procedures were performed in accordance with the scope and approach set forth in our executed scope of work, dated April 7, 2020 and were limited to those described therein. The scope period was December 2019 through March 2020. Fieldwork was performed April 2020 through July 2020. Several meetings were held with BCPS personnel from August 2020 – July 2021 to discuss system updates and 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 200 threats for compliance with the Threat Assessment policies and procedures.
- Report, both verbally and in writing, documenting observations, providing recommendations and opportunities for improvement.

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 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 2019 Behavioral Threat Assessment (BTA) Policy and Procedures Manual;
- Reviewed the Public Consulting Group's EdPlan Quick Reference Guide; and
- Reviewed training aids.

Testing for Compliance with Policy and Procedures

Tested compliance with the BTA Policy and Procedures. We selected 200 threats during the scope period (December 2019 to March 2020). The objectives of our testing was 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.* We tested for existence and completeness, among other attributes, for the following:

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

Reporting

Since the conclusion of our procedures, our summarized findings and observations have been incorporated into this written report. We have reviewed the results with Management, and have incorporated Management's response to the summarized finding and observations 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. The sample was selected from the population provided, with emphasis placed on high and medium-level threats. A total of 875 threats were reported by school-based administrators during our scope period of December 2019 to March 2020, excluding charter schools and duplicate system entries.

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

	Total Population					
School Type	High/Very Serious	Medium/Serious	Low/Transient	Unfounded/ No Threat	Totals	
High School	12	34	72	38	156	
Middle School	9	33	89	35	166	
Elementary School	1	45	320	104	470	
Centers	24	18	33	8	83	
Totals	46	130	514	185	875	

Our analysis for sampling focused on two attributes: threat level and school type. RSM analyzed the population by creating pivot tables and sorting the remaining data.

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 200. Internal Audit requested that we include all high and medium-level threats in our sample. There were 46 high-level threats and 130 medium-level threats in the population, resulting in a total of 176 of the 200 samples selected. The remaining 24 samples were equally split and selected from the low-level and unfounded-level of recorded threats. When selecting the remaining samples, consideration was first given to high schools, followed by middle schools, elementary schools, and lastly to centers, as requested by BCPS.

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

	Original - Samples Selected by School Type and Threat Level					
	High/Very			Unfounded/		
School Type	Serious	Medium/Serious	Low/Transient	No Threat	Totals	
High School	12	34	5	5	56	
Middle School	9	33	4	4	50	
Elementary School	1	45	2	2	50	
Centers	24	18	1	1	44	
Totals	46	130	12	12	200	



SAMPLING METHODOLOGY - CONTINUED

After selecting and beginning the testing for the 200 samples above, 11 students were found to be "inactive" within the System. An inactive student indicates that the student: a) transferred to another state, b) transferred to another school district, or c) transferred to a home school program. Therefore, 11 replacement selections were selected and tested. The number of high/medium level threats went from 176 to 165 samples because of the student's status being listed as "inactive".

The updated table below summarizes the total number of records that were tested by threat level and school type.

Fin	Final - Samples Selected and Tested by School Type and Threat Level					
	High/Very			Unfounded/		
School Type	Serious	Medium/Serious	Low/Transient	No Threat	Totals	
High School	11	33	8	7	59	
Middle School	7	29	6	6	48	
Elementary School	1	42	3	2	48	
Centers	24	18	2	1	45	
Totals	43	122	19	16	200	

Internal Audit Report Issued: August 3, 2021



ATTRIBUTES TESTED

BCPS provided the following 37 attributes for testing with references to the Threat Assessment Policy Manual, 2019 BTA Procedures manual, and the BTA Technical Updates from October 2019, as applicable:

		Attributes	Policy 2130***	Manual Page Num*
	1	Was the Student Risk Intake Form present in EdPlan?	Section III, G, b	16, 17, 36
Student Intake Form	2	Was the Student Risk Intake Form substantially completed?	Section III, G, b	16, 17-18, 36-38
Student intake Form	3	Was the Student Risk Intake Form finalized?	Section III, G, b	32
	4	Was the Student Risk Intake Form completed by the school-based administrator?	Section III, G, b	17, 36
BTA Part 1: Incident	5	Was the Behavioral Threat Assessment created in EdPlan?	Section III, G, b	8, 16, 19, 39
Information	6	Was the BTA Part 1 substantially complete?	Section III, G, b	16, 19, 39-41
illomation	7	Was the threat assessment team covered within 24 hours?	Section III, F	8, 18, 19, 38, 41
	8	Was the Initial Student Interview present? (entered directly into Edplan or attached to the BTA in EdPlan)	Section III, G, b	16, 20, 42
	9	Was the Initial Student Interview Form substantially complete?	Section III, G, b	16, 42-43
	10	Was the Initial Student Interview completed by the school-based administrator?	Section III, G, b	20, 42
BTA Part 2: Data	11	Was the Teacher Input Form present?	Section III, G, b	16, 20, 44
Collection	12	Was the Teacher Input Form substantially complete?	Section III, G, b	16, 44-45
	13	If the student previously exhibited behaviors of concern or posed a threat, was the description (narrative) of prior		
		incidents substantially complete?		16, 22, 33
	14	Were the Mandatory immediate actions taken and documented if an imminent threat has been identified?	1 1	16, 18, 19, 32, 38, 41
Required for	15	Was the Clinical Parent Interview substantially complete?	Section III, G, b, H	
Medium/High Risk	16	Was the Clinical Parent Interview completed by mental health professional?	Section III, G, b, H	
Levels only (from Part 3	17	Was the Clinical Student Interview present?	Section III, G, b, H	
determination)	18	Was the Clinical Student Interview substantially complete?	Section III, G, b, H	
,	19	Was the Clinical Student Interview completed by a mental health professional?	Section III, G, b, H	21, 54
	20	Were all mandatory BTA team members present during the analysis? If any of the team members were not present, was the reason documented?	Section III, G, b	8, 20, 23, 26
	21	Were the answers to each of the key ten questions substantially complete?	Section III, G, b	16, 23-24, 33
	22	Was the parent/guardian contacted?		8, 23, 25, 33
	23	Was the parent/guardian contact documentation (narrative) substantially complete?	Section III, G, b	25, 33
BTA Park 3: Analysis,	24	If the parent could not be contacted was the reason documented?		25, 33
Risk Level, and Student	25	Was the BTA finalized in EdPlan?	Section III, G, b	16, 26, 33
Support Plan	26	Was the BTA finalized within 24 hours; if not was a reason documented?	Section III, G, b	19, 26, 33, 39, 41
	27	Was the Signatures page of the BTA uploaded to the BTA in EdPlan?	Section III, G, b	27
	28	Was the BTA signed by all team members as required?	Section III, G, b	27
	29	Did the Principal acknowledge Threat Assessment in EdPlan?	Section III, G, b; I	8, also see note**
	30	Was the completed BTA documented in TERMS?		8, 27



ATTRIBUTES TESTED - CONTINUED

		Attributes	Policy 2130***	Manual Page Num*
	31	Was the Monitoring Plan created?	Section III, G, b, d	27
	32	Was the Monitoring Plan finalized in EdPlan?	Section III, G, b	27, 33
Monitoring Plan (if	33	Was the Monitoring Plan finalized within 72 hours of completing BTA parts 1-3?	Section III, G, b	27, 33
required) Medium or	34	Was the Signatures page of the Monitoring Plan uploaded to the BTA in EdPlan?	Section III, G, b	27
High		Was the Monitoring Plan signed by all monitoring plan meeting participants?	Section III, G, b	27
		Was the Monitoring Plan reviewed/modified by all team members every 30 school days (or earlier if warranted)?	Section III, G, b	27, 33
	37	Was the documentation of all actions listed on the Monitoring Plan uploaded in EdPlan?	Section III, G, b	8, 27
*		ι Procedures Manual (8/21/2019) - Appendix VII		
**	Behaviora	ll Threat Assessment (BTA) Technical Updates October 2019 - Appendix VIII		
***	Policy 21	30, Threat Assessment Policy (3/5/2019) - Appendix VI		



POLICY REFERENCES

The table below shows the policy section references that were tested and mentioned throughout the report.

Section	Brief Description *	Audited?
А	Chief of Safety, Security, and Emergency Preparedness shall ensure compliance with the policy.	Not Auditable
В	Each school principal shall identify members of a threat assessment team.	Yes
С	All school-based administrations and threat assessment members must attend and complete mandatory district threat assessment trainings annually.	Yes
D	The team must provide annual training and guidance to students, staff, and parents on recognizing behaviors and various options of reporting.	Yes
E	Each school principal must assign school-based staff members who can proactively monitor and respond to incoming reports.	Yes
F	The team must respond to any threat within 24 hrs. if school is in session, or refer the threat to law enforcement if school is not in session. After the team must conclude if the threat is closed.	Yes
G	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.	Yes
Н	The team shall follow guidelines for evaluation and treatment.	Yes
I	The threat assessment outcomes and recommendations must be reported to the school principal who will review. The team will contact the student's family, or law enforcement if immediate action is necessary.	Yes
J	If an immediate crises exists, all necessary personnel resources will be engaged and contacted.	Yes
K	The threat assessment team will identify members of the community who should be notified of the threat.	Not Auditable
L	All SBBC employees, volunteers, and contractors are required to report any threats or behaviors.	Not Auditable
М	Regardless of threat assessment activities, disciplinary action and referral to law enforcement must occur.	Yes
N	The team can obtain criminal history record information after identifying a threat.	Not Auditable
0	The team must consult with law enforcement after identifying a pattern of behavior that may constitute a threat.	Yes
Р	If a student commits more than one misdemeanor, the team must consult law enforcement.	Yes
Q	If a student may be expelled or suspended, the school will identify how to assist the student.	Not Auditable
R	Threat assessment records shall be maintained and released according to FERPA and state statute.	Not Auditable
S	The Chief Auditor will conduct annual audits and report findings.	Yes
* Policy 21	30, Threat Assessment Policy (3/5/2019) - Appendix VI	



Observation	1. STUDENT RISK INTAKE FORM
Low	Please note that several of the exceptions noted below in this observation are systematically prevented from occurring in the future with recent system updates.
	The student risk intake form is utilized to document the initial threat. This form is noted as the start of the process and leads to a behavioral threat assessment (BTA), a suicide risk assessment (SRA), or both. This form is required to be completed by a school-based administrator, as stated in the BTA procedures manual. A student risk intake form must be completed and finalized regardless of threat level (low, medium, high).
	11% (21 samples) of the 200 samples selected did not have a student risk intake form documented within the system, as required by attribute #1 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	 5 samples were high-level threats (1 High Schools, 1 Middle School, 3 Centers) 12 samples were medium-level threats (1 High School, 7 Middle Schools, 2 Elementary Schools, 2 Centers) 2 samples were low-level threats (1 Middle School, 1 Center) 2 samples were unfounded-level threats (2 High Schools)
	15% (29 samples) of the 200 samples selected had a student risk intake form documented within the system, however, the form was not finalized , as required by attribute #3 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	 6 samples were high-level threats (1 High School, 2 Middle Schools, 3 Centers) 16 samples were medium-level threats (3 High Schools, 5 Middle Schools, 6 Elementary Schools, 2 Centers) 3 samples were low-level threats (2 High Schools, 1 Elementary School) 4 samples were unfounded-level threats (1 Middle School, 2 Elementary Schools, 1 Center)
	Through preliminary reviews of the 2021 school year's 75 threat assessment samples that were tested, the Student Risk Intake Form attributes 1 & 3 in the 'Attributes Tested' section of this report, no exceptions were noted.
RSM Recommendation(s)	During preliminary testing performed for school year 2020-2021, this observation appears to have improved, however, we recommended following the BTA procedures manual, without exception.



Observation	1. STUDENT RISK INTAKE FORM – CONTINUED
District Staff Response	Overview Response In December 2019, the Student Risk Intake Form was integrated into the BTA process in EdPlan. As a result of this update, administrators are required to initiate the process through the Student Risk Intake Form before proceeding to the Behavioral Threat Assessment process. In June 2020, EdPlan was updated to require the Student Risk Intake to be finalized before proceeding to the Behavioral Threat Assessment process. However, it is important to note that Part 1 of the BTA process captures the very same information (Incident Date, Date Reported, Intended Target, Detailed Narrative, etc.) that is obtained using the Student Risk Intake Form. Therefore, though this specific document, the Student Risk Intake Form, may have been missing, the administrator would have had to gather and enter the very same information in the next step (Part 1) of the BTA. Currently, the information from the Student Risk Intake Form automatically populates into the BTA Part 1. School-based Response
	Principals are required to review Part 1 of the BTA and acknowledge in EdPlan that all parts of the Behavioral Threat Assessment are completed. The current process in Ed Plan does not allow BTA Team Members to begin Part 2 until all components of Part 1 is completed.
	Cadre Based Response
	After principals acknowledge a finalized threat assessment, cadre directors complete a Level 2 Acknowledgement to ensure all parts of the Behavioral Threat Assessment are completed in Ed Plan. Cadre Directors receive monthly reports from the Office of Academics and work in conjunction with District staff and school leaders to ensure compliance with school board policy.
	Academics-ESLS Based Response
	BTA Annual Update and Review Course was released in 2020-2021 to include a review of all mandatory BTA components, including the Student Risk Intake Form. BTA Annual Update and Review Course training recommenced in July 2021 and includes explicit information to address this observation.
	Status as of June 30, 2021
	Systemically, this issue has been resolved as of June 2020. Currently, the information from the Student Risk Intake Form automatically populates into the BTA Part 1.
	*See Appendix IV for Consolidated District Cabinet Responses
Estimated Completion Date	June 2020



DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE - CONTINUED

Observation

2. TIMELINESS, ACCURACY, AND COMPLETENESS OF THE BEHAVIOR THREAT ASSESSMENT (BTA)

High

The BTA consists of three parts: part one is identified as the incident information portion. This includes specific details of the incident (who, what happened, when, where). Part two encompasses the data collection process, which includes interviews with students and parents, records review, social media/artwork review, etc. Part three is the analysis, risk level determination, and configuring an appropriate student support plan, or monitoring plan.

Per the Threat Assessment Policy Section 3F, the BTA team must respond, within 24 hours when school is in session, to any report of a threat or any patterns in behavior that may pose a threat to self or others. If school is not in session, the school principal must immediately refer to law enforcement for evaluation, and the threat assessment team must meet no later than end of the first day school is back in session.

Per the BTA Procedures manual, the BTA must be signed by all team members. These individuals include the administrator(s), teacher(s), student resource officer(s)/law enforcement officer(s), and mental health professional(s).

Along with the electronic record in EdPlan, the completed threat assessments must be documented in the Total Educational Resource Management System (TERMS) by a member of the BTA team. TERMS is the system of record for student information and is required to be submitted to the State of Florida. The student information includes demographics, health, school assignments, attendance, schedules, grades, test scores, discipline tracking, etc.

<u>Timeliness – Responsiveness</u>

9% (17 samples) of the 200 samples selected, the BTA team did not respond within 24 hours of the initial report, as required by attribute #7 in the 'Attributes Tested' section of this report.

A breakdown of the findings by threat level and school type are as follows:

- 5 samples were high-level threats (4 High Schools, 1 Center)
- 8 samples were medium-level threats (8 High Schools)
- 3 samples were low-level threats (2 High Schools, 1 Middle School)
- 1 sample were unfounded-level threats (1 Center)

See **2A** in **Appendix II** for the samples whose BTA team did not respond within 24 hours of the initial report, however, had documented that the student was either arrested or Baker Acted, which likely caused the delay to the BTA process, as the students were not accessible within the 24 hour timeframe.



Observation	2. TIMELINESS, ACCURACY, AND COMPLETENESS OF THE BEHAVIOR THREAT ASSESSMENT (BTA) - CONTINUED
	<u>Timeliness – Finalization</u>
	54% (108 samples) of the 200 samples selected, the BTA was not finalized (completed) within 24 hours, as required by attribute #26 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	23 samples were high-level threats (6 High Schools, 4 Middle Schools, 13 Centers)

- 65 samples were medium-level threats (18 High Schools, 16 Middle Schools, 22 Elementary Schools, 9 Centers)
- 8 samples were low-level threats (4 High Schools, 3 Middle Schools, 1 Center)
- 12 samples were unfounded-level threats (5 High Schools, 5 Middle Schools, 1 Elementary School, 1 Center)

See **2B in Appendix II** for the samples whose BTA was not finalized (completed) within 24 hours, however, had documented that the student was either arrested or Baker Acted, which likely caused the delay to the BTA process.

Accuracy (Inconsistency)

2% (3 samples) of the 200 samples selected, the BTA dates contained inconsistencies, therefore, we were unable to test attribute #26 in the 'Attributes Tested' section of this report for the samples below.

A breakdown of the findings by threat level and school type are as follows:

• 3 samples were medium-level threats (1 High School, 1 Middle School, 1 Elementary School)

For example, one student's incident date was documented as 2/7/2020, however, the administrator learned of the incident date on 1/31/2020, which is before the incident date. Also, the BTA was documented as completed on 2/5/2020, which is also before the recorded incident date. We were unable to determine if the BTA team was mobilized and finalized within 24 hours based on the inconsistency of these dates. The two other instances referenced above had similar inconsistencies surrounding the documented dates.



oservation	2. TIMELINESS, ACCURACY, AND COMPLETENESS OF THE BEHAVIOR THREAT ASSESSMENT (BTA) - CONTINUED
	<u>Completeness</u>
	43% (86 samples) of the 200 samples selected, the BTA was not signed by all team members, as required by attribute #28 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	 22 samples were high-level threats (5 High Schools, 6 Middle Schools, 11 Centers) 54 samples were medium-level threats (11 High Schools, 22 Middle Schools, 11 Elementary Schools, 10 Centers) 5 samples were low-level threats (3 High Schools, 2 Middle Schools) 5 samples were unfounded-level threats (2 High Schools, 2 Middle Schools, 1 Elementary School)
	17% (15 samples) of the 86 samples above, the BTA was signed by all team members, except the Law Enforcement Officers (LEO). The LEO line was blank with no documentation stating they did not sign or were unable to sign.
	A breakdown of the findings by threat level and school type are as follows:
	 4 samples were high-level threats (3 Middle Schools, 1 Center) 10 samples were medium-level threats (2 High Schools, 4 Middle Schools, 1 Elementary School, 3 Centers) 1 sample were unfounded-level threats (1 Elementary School)
L	See 2C in Appendix II for 13 samples not included in the 86 samples above, where the BTA was signed by all team members, except the aw Enforcement Officers (LEO). The LEO either refused (#1) or was unable to sign (#2). However, the signature form was appropriately locumented.
	Completeness (Unable to Locate Within TERMS)
	44% (87 samples) of the 200 samples selected, the threat was not located within the TERMS system, as required by attribute #30 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	 17 samples were high-level threats (3 High Schools, 4 Middle Schools, 1 Elementary School, 9 Centers) 52 samples were medium-level threats (8 High Schools, 16 Middle Schools, 22 Elementary Schools, 6 Centers) 10 samples were low-level threats (3 High Schools, 4 Middle Schools, 2 Elementary Schools, 1 Center) 8 samples were unfounded-level threats (4 High Schools, 3 Middle Schools, 1 Center)



Observation	2. TIMELINESS, ACCURACY, AND COMPLETENESS OF THE BEHAVIOR THREAT ASSESSMENT (BTA) - CONTINUED
RSM Recommendation(s)	We recommend adding procedures to the BTA manual that documents how the staff is to proceed when a parent and/or student refuses to participate in the interviews. Further, the procedures manual should document how to proceed when a student moves out of the school district, is Baker Acted, or arrested. These factors affect the timeliness of the BTA process during the mobilization and finalization phase, as a 24-hour turnaround is currently required. Please see 2A and 2B located in Appendix II – Additional Information .
	We recommend documenting in the BTA procedures manual how to proceed and document when a Law Enforcement Officer does not sign, unable to sign, or the signature line is blank on the BTA.
	We recommend monthly or quarterly checks to ensure all threats are logged into the TERMS system from the EdPlan System to ensure completeness.
	We recommend following the BTA procedures manual, without exception.
District Staff Response	Overview Response 24 Hour Completion: Per policy 2130 - 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. The manual recommends that, barring extenuating circumstances, the Behavioral Threat Assessment should be completed within 24 hours as a best practice. In extenuating circumstances (e.g., student unavailable due to a Baker Act, parent unavailable for interview until a later time, etc.) administrators are directed to document the reason for the delay. Additionally, if a BTA is not finalized within 24 hours, administrators receive an alert on their EdPlan Dashboard along with an email notifying them of a message in EdPlan. Reports are also pulled from the EdPlan Management System and sent to Cadre Directors for follow up monthly. In September 2019, guidance was shared with administrators through a PIVOT Memo on how to proceed when a parent and/or student refuses or is unavailable to participate in the required interviews. In November 2020, the EdPlan system was updated to populate the required interviews (per threat level determination) as required fields for all BTA's. BTA's cannot be finalized until all required fields are completed. The BTA Manual revision (December 2020, pg. 23-24) also included guidance on how to proceed when parent and/or student refused to participate or were unavailable to participate in the required interviews. Signatures: A report is pulled from the EdPlan Management System to identify if there are BTA Signature Pages missing. Currently, District staff and cadre directors follow up with all schools monthly to ensure that all signature pages are correctly attached to each Behavioral Threat Assessment. In August 2020, Participation Type selections were added to the Signature Page for the team to indicate when a team member participated even if they chose not to sign the document. For all Signature Pages that were identified as missing through this audit



Observation	2. TIMELINESS, ACCURACY, AND COMPLETENESS OF THE BEHAVIOR THREAT ASSESSMENT (BTA) - CONTINUED
District Staff Response	TERMS: The Instructional Technology Department runs weekly reports on TERMS entries associated with BTA's in EdPlan. The report is shared with District staff to follow up and ensure that BTA's are entered into TERMS.
	<u>School-based Response</u> Principals are responsible for ensuring that a completed signature page with all required signatures is correctly attached to the Behavioral Threat Assessment in Ed Plan.
	Cadre Based Response After principals acknowledge a finalized threat assessment, Cadre Directors complete a Level 2 Acknowledgement to ensure all parts of the Behavioral Threat Assessment are completed in Ed Plan. Cadre Directors receive monthly reports from the Office of Academics of Behavioral Threat Assessments with no signature page attached. Cadre directors work in conjunction with District staff and school leaders to ensure compliance with uploading and attaching the signature page in Ed Plan.
	Academics-ESLS Based Response BTA Annual Update and Review Course was released in 2020-2021 to include a review of all mandatory BTA components and the policy language related to responding to any report of a threat within 24 hours. This training also included a review of procedures for obtaining, documenting, and uploading Signature Pages.
	Status as of June 30, 2021 For the 2020 – 2021 school year, 100% of the Behavioral Threat Assessments completed had a signature page correctly attached.
	*See Appendix IV for Consolidated District Cabinet Responses
Estimated Completion Date	June 30, 2021



Observation

3. INITIAL STUDENT INTERVIEW AND TEACHER INPUT FORMS

High

The initial student interview is conducted during part two of the BTA process. The initial student interview must be completed by a school-based administrator and must be completed, regardless of threat level type (high, medium, low). The teacher input form is also completed during part two of the BTA process. The teacher input form documents the student's academic performance in the classroom, their behavior in class, and any additional commentary the teacher identifies as relevant to the incident.

Initial Student Interview:

16% (31 samples) of the 200 samples selected, were missing an initial student interview, as required by attribute #8 in the 'Attributes Tested' section of this report.

A breakdown of the findings by threat level and school type are as follows:

- 10 samples were high-level threats (4 High Schools, 1 Middle School, 5 Centers)
- 17 samples were medium-level threats (3 High Schools, 7 Middle Schools, 2 Elementary Schools, 5 Centers)
- 3 samples were low-level threats (1 High School, 1 Middle School, 1 Center)
- 1 sample were unfounded-level threats (1 Middle School)

Teacher Input Form:

20% (40 samples) of the 200 samples selected, were missing a teacher input form, as required by attribute #11 in the 'Attributes Tested' section of this report.

A breakdown of the findings by threat level and school type are as follows:

- 9 samples were high-level threats (4 High Schools, 3 Middle Schools, 2 Centers)
- 20 samples were medium-level threats (3 High Schools, 10 Middle Schools, 4 Elementary Schools, 3 Centers)
- 5 samples were low-level threats (2 High Schools, 2 Middle Schools, 1 Center)
- 6 samples were unfounded-level threats (2 High Schools, 3 Middle Schools, 1 Center)

RSM Recommendation(s)

We recommend documenting how to proceed when a parent and/or student refuses to participate in the interviews in the BTA procedures manual.

We recommend following the BTA procedures manual, without exception.



In Nov for all to include the second	view Response vember 2020, the EdPlan system was updated to populate the Initial Student Interview and Teacher Input Form as required fields BTA's. These entries must be completed before finalizing the BTA. Additionally, the BTA Manual was updated in December 2020 lude guidance on how to proceed when a parent and/or student is unable to/refuses to participate.
Cadre After p of the and w Asses Acade BTA A Initial Status For the Input I and Te	ol-based Response pals are required to review the Student Interview and Teacher Input Form of the BTA and acknowledge in Ed Plan that all parts Behavioral Threat Assessment are completed. As of December 2020, the manual provides principals guidance on how to proceed a parent and/or student is unable to/refuses to participate. Behavioral Threat Assessment are completed in Ed Plan. Cadre directors complete a Level 2 Acknowledgement to ensure all parts Behavioral Threat Assessment are completed in Ed Plan. Cadre Directors receive monthly reports from the Office of Academics work in conjunction with District staff and school leaders to ensure compliance if any components of the Behavioral Threat assment are missing. Bemics-ESLS Based Response Annual Update and Review Course was released in 2020-2021 to include a review of all mandatory BTA components, including Student Interviews and Teacher Input Forms. Be as of June 30, 2021 Be 2020 - 2021 school year, 100% of finalized Behavioral Threat Assessments have a completed Student Interview and Teacher Form included as the system will not allow a Behavioral Threat Assessment to be finalized without a completed Student Interview Feacher Input Form. Appendix IV for Consolidated District Cabinet Responses
Estimated Completion Date	30, 2021



DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE - CONTINUED

Observation

4. CLINICAL PARENT AND STUDENT INTERVIEWS

High

For all medium-level and high-level threats, it is mandatory that a clinical parent and clinical student interview be conducted by a mental health professional.

Clinical Parent Interview

21% (34 samples) of the 165 high/medium level samples, were missing a clinical parent interview, as required by attribute #15 in the 'Attributes Tested' section of this report.

A breakdown of the findings by threat level and school type are as follows:

- 11 samples were high-level threats (3 High Schools, 5 Middle Schools, 1 Elementary School, 2 Centers)
- 23 samples were medium-level threats (2 High Schools, 9 Middle Schools, 10 Elementary Schools, 2 Centers)

See **4A** in **Appendix II** for the samples who had missing clinical parent interviews, however, it was documented that the parent(s) and/or guardian(s) either refused or were unable to be reached.

Mental Health Professional - Clinical Parent Interview

11% (13 samples) of the 122 high/medium-level samples had a clinical parent interview completed, however, they were not conducted by a mental health professional as required by attribute #16 in the 'Attributes Tested' section of this report.

A breakdown of the findings by threat level and school type are as follows:

- 5 samples were high-level threats (1 High School, 4 Centers)
- 8 samples were medium-level threats (3 Middle Schools, 2 Elementary Schools, 3 Centers)



Observation	4. CLINICAL PARENT AND STUDENT INTERVIEWS
	Clinical Student Interview
	24% (39 samples) of the 165 high/medium-level samples, were missing a clinical student interview, as required by attribute #17 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	 7 samples were high-level threats (2 High Schools, 3 Middle Schools, 1 Elementary School, 1 Center) 32 samples were medium-level threats (3 High Schools, 14 Middle Schools, 11 Elementary Schools, 4 Centers)
	See 4B in Appendix II for the samples who had missing clinical student interviews, however, it was documented that the student either refused or was unable to participate.
	Mental Health Professional – Clinical Student Interview
	9% (11 samples) of the 120 high/medium-level samples had clinical student interviews, however, were not conducted by a mental health professional as required by attribute #19 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	 5 samples were high-level threats (1 High School, 4 Centers) 6 samples were medium-level threats (4 High Schools, 2 Middle Schools)
RSM Recommendation(s)	We recommend documenting how to proceed when a parent and/or student refuses to participate in the clinical interview. Please see 4A and 4B located in Appendix II – Additional Information .
rtocommonaution(c)	We recommend following the BTA procedures manual, without exception.
District Staff Response	Overview Response In November 2020, the EdPlan system was also updated to populate the Clinical Parent & Student Interviews as required fields for all Substantive Risk Level determinations. These entries must be completed before finalizing the BTA. BTA Manual revision (December 2020, pg. 23-24) included guidance on how to proceed when parent and/or student refused to participate or were unavailable to participate in the required interviews. When principals and Cadre Directors acknowledge the finalized BTA's they review completion of all required documents, to include the Clinical Student Interviews, when required (all substantive threats).
	Ed Plan User Type Permissions were updated in January 2021, so that only mental health professionals can complete the clinical interviews. Administrators currently do not have the capability to complete a clinical interview in the EdPlan system.



Observation	4. CLINICAL PARENT AND STUDENT INTERVIEWS - CONTINUED
District Staff Response	School-based Response Principals are required to review the Clinical Parent and Student Interviews of the BTA when applicable and acknowledge in Ed Plan that all parts of the Behavioral Threat Assessment are completed. As of December 2020, the manual provides principals guidance on how to proceed when a parent and/or student is unable to/refuses to participate.
	Cadre Based Response After principals acknowledge a finalized threat assessment, cadre directors complete a Level 2 Acknowledgement to ensure all parts of the Behavioral Threat Assessment are completed in Ed Plan. Cadre Directors receive monthly reports from the Office of Academics and work in conjunction with District staff and school leaders to ensure compliance if any components of the Behavioral Threat Assessment are missing.
	Academics-ESLS Based Response BTA Annual Update and Review Course was released in 2020-2021 to review all mandatory BTA components.
	Status as of June 30, 2021 For the 2020 - 2021 school year, 100% of finalized Behavioral Threat Assessments have a completed Clinical Student and Parent Interview when applicable included as the system will not allow a Behavioral Threat Assessment to be finalized without a completed Student Interview and Teacher Input Form.
	*See <i>Appendix IV</i> for Consolidated District Cabinet Responses
Estimated Completion Date	June 30, 2021



DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE - CONTINUED

Observation

5. MONITORING PLAN

High

For every medium-level and high-level threat, a monitoring plan is required to be created by the BTA team. The monitoring plan identifies disciplinary actions, monitoring actions (i.e. checking backpack daily, escorted to classes, etc.), and determines whom is responsible to conduct the monitoring of the student. The monitoring plan must be finalized no later than 72 hours after finalization of the BTA. The monitoring plan must be signed by all participants, or documentation much be included that they participated via telephone, etc. The BTA team must reconvene, at least every 30 days, from the development of the initial monitoring plan, for review and modification(s).

Completeness

60% (99 samples) of the 165 medium-level and high-level threat samples, were missing a monitoring plan for the incident selected for testing, as required by attribute #31 in the 'Attributes Tested' section of this report.

A breakdown of the findings by threat level and school type are as follows:

- 35 samples were high-level threats (9 High Schools, 7 Middle Schools, 19 Centers)
- 64 samples were medium-level threats (17 High Schools, 15 Middle Schools, 19 Elementary Schools, 13 Centers)

Of the 99 samples missing a monitoring plan, one (1) of the students already had a monitoring plan in place from a previous threat outside of the scope of this project.



Observation	5. MONITORING PLAN - CONTINUED
	Finalization (Monitoring Plan Finalization)
	5% (3 samples) of the 66 medium-level and high-level threat samples that conducted a monitoring plan, were not finalized in the EdPlan system, as required by attribute #32 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	3 samples were medium-level threats (2 Middle Schools, 1 Elementary School)
	<u>Timeliness (Monitoring Plan Completed)</u>
	79% (52 samples) of the 66 medium-level and high-level threat samples that conducted a monitoring plan, were not finalized within 72 hours of the BTA, as required by attribute #33 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	 7 samples were high-level threats (2 High Schools, 1 Elementary School, 4 Centers) 45 samples were medium-level threats (13 High Schools, 12 Middle Schools, 16 Elementary Schools, 4 Centers)
	Completeness (Missing Signatures Page of Monitoring Plan)
	5% (3 samples) of the 66 medium-level and high-level threat samples that completed a monitoring plan, did not contain a signature page in the system, as required by attribute #34 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	 2 samples were high-level threats (2 Centers) 1 sample were medium-level threats (1 Elementary School)
	Completeness (Missing Signatures of Monitoring Plan)
	100% (66 samples) of the 66 medium-level and high-level threat samples that conducted a monitoring plan, were not signed by all parties, as required by attribute #35 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	 8 samples were high-level threats (2 High Schools, 1 Elementary School, 5 Centers) 58 samples were medium-level threats (16 High Schools, 14 Middle Schools, 23 Elementary Schools, 5 Centers)



	5. MONITORING PLAN - CONTINUED
	<u>Timeliness & Completeness (Review of Monitoring Plan)</u>
	82% (54 samples) of the 66 medium-level and high-level threat samples that conducted a monitoring plan, were not reviewed within the 30 days by the BTA team members, as required by attribute #36 in the 'Attributes Tested' section of this report.
	A breakdown of the findings by threat level and school type are as follows:
	 5 samples were high-level threats (2 High Schools, 3 Centers) 49 samples were medium-level threats (14 High Schools, 12 Middle Schools, 19 Elementary Schools, 4 Centers)
RSM Recommendation(s)	We recommend documenting in the BTA procedures manual on how to proceed when there's a previous monitoring in place, whether that be creating a new monitoring plan or amending the existing one. We recommend following the BTA procedures manual, without exception.
District Staff Response	Overview Response Initially, when the system was first developed, Monitoring Plans could not be printed. Therefore, a signature page could not be generated for teams to utilize. This was updated in March 2020. The School Administrator's EdPlan Dashboard view was also updated in January 2021 to provide the ability to monitor outstanding/open Monitoring Plans. Alerts regarding open/outstanding Monitoring Plans are also posted to the school administrator's EdPlan Message board and an email is sent to them notifying them of a new message in EdPlan. EdPlan was also updated in January 2021 to auto-generate Monitoring Plans for all Substantive level threats.
	Reports are pulled from the EdPlan Management system monthly and shared with cadre directors for follow up when monitoring plans are not finalized.
	The feature to revise/review Monitoring Plans was added to EdPlan in August 2020. BTA Manual revision (December 2020, pg. 41) included guidance on how to complete Monitoring Plan reviews and revisions.
	For the Monitoring Plans that were identified as missing, follow up was completed by the Office of School Climate and Discipline and Office of Academics in May and June of 2020 to ensure students were receiving the required support based on the identified incident. All monitoring plans were in place as of June 2021. District staff is in the process of reviewing to determine if Monitoring Plans are complete for incidents outside of the audit and will finalize their conclusions by September 30, 2021.



	5. MONITORING PLAN - CONTINUED
District Staff Response	School-based Response Principals are required to ensure monitoring plans are developed and implemented with fidelity when applicable and acknowledge in Ed Plan that all parts of the Behavioral Threat Assessment are completed. Alerts regarding open/outstanding Monitoring Plans are also posted to the school administrator's EdPlan Message board and an email is sent to them notifying them of a new message in EdPlan.
	<u>Cadre Based Response</u> The Office of Academics shares monthly reports and collaborates with cadre directors on a regular basis to follow up with principals when a monitoring plan is not in compliance with school board policy.
	Academics-ESLS Based Response BTA Annual Update and Review Course was released in 2020-2021 to review all mandatory BTA components, including Monitoring Plans.
	Status as of June 30, 2021 Beginning in January 2021, Ed Plan was updated to provide the ability to monitor outstanding/open Monitoring Plans. At the close of the 2020 – 2021 school year 100% of monitoring plans were closed and in compliance with policy.
	*See <i>Appendix IV</i> for Consolidated District Cabinet Responses
Estimated Completion Date	June 30, 2021

ADDITIONAL CONSIDERATIONS

	OVERALL PROCESS IMPROVEMENTS
	File Name and Locations
	Naming conventions ensures users how to name the uploaded documents so that file names are consistent and contain all the right information. They also help store and organize the files. Without them, the student's threat record can make it much harder to find the forms when access is needed.
	During our review, we noted inconsistencies with the uploaded document file names. In addition, the document files were uploaded to different areas within the EdPlan system. For example, some files and information were found within the BTA tab, documents tab, contacts tab, and/or matrix of services tab.
	Automated Signature and Date
	Signatures and dates of signatures are a required step in the BTA process. This step is currently a manually process that requires a printed signature page and a live signature from several key team members. This signature page is then scanned and uploaded into the EdPlan system.
	Since this is currently a manual process, a large portion of the signature pages for the BTA and monitoring plans, if applicable, were unsigned, or dated with dates inconsistent with the date of the threat.
	See "Detailed Observations and Related District Staff Response" section, <i>Observation #2</i> and <i>Observation #5</i> for specifics surrounding the missing signature and date inconsistencies.
RSM Recommendation(s)	We recommend a consistent naming convention and location for all uploaded files across all school types and threat levels within BCPS. This practice will keep the process consistent between staff members uploading, completing, and monitoring the BTA forms. Consistent and descriptive naming conventions and organizing files so that it is obvious where to find specific data and what the files contain is imperative to this effectiveness of the BTA process and EdPlan system.
	We recommend exploring an electronic signature and dating feature to the EdPlan system. This will assist with the completeness of obtaining the signatures, since it is a remote activity and would remove the date inconsistencies as the signature portion would only be accessible after the assessment has been completed. An automated trigger could also be incorporated to alter the core team members when the assessment is ready for their signature.
District Staff Response	The District accepts the recommendations to establish and train staff on standardized file naming conventions to improve file storage navigation for system users. Additionally, staff will review, and where appropriate, work to ensure that file storage locations are consistent across locations.
	Digital signature functionality was previously identified by the District as an area of improved functionality. Adobe Sign was enabled for the period remote learning, digital parent signatures have been enabled for IEPs and are being extended to BTA, and a comprehensive, integrated solution is being enabled for the 2021-22 school year.
	*See Appendix IV for Consolidated District Cabinet Responses



APPENDIX I: SUMMARY

There are 37 attributes that were tested within the 200 threats sampled. Our sample was not intended to be representative of the population; rather, our sample was selected with a specific focus on the medium and high-level risk threats, as requested by Internal Audit. A detailed listing of the results are included in the "Detailed Observations and Related District Staff Response" section of this report. The table below illustrates a high-level analysis of the results of our testing by risk level, school type and document type.

By Risk Level	 Unfounded/No Threat: Exceptions were noted for 16, or 100%, of the 16 unfounded threats tested. Low Risk: Exceptions were noted for 16, or 84%, of the 19 low risk threats tested. The remaining 3 low risk threats, or 16% tested had no exceptions. Medium Risk: Exceptions were noted for 122, or 100%, of the 122 medium risk threats tested. High Risk: Exceptions were noted for 43, or 100%, of the 43 high risk threats tested.
By Type of School	 Centers: Exceptions were noted for 45, or 100%, of the 45 threats tested. Elementary Schools: Exceptions were noted for 47, or 98%, of the 48 threats tested. One Elementary School, or 2% tested had no exceptions. Middle Schools: Exceptions were noted for 48, or 100%, of the 48 threats tested. High Schools: Exceptions were noted for 57, or 97%, of the 59 threats tested. Two High Schools, or 3% tested had no exceptions.
By Document Type	 Student Risk Intake Form: Exceptions were noted for 21, or 11%, of the 200 threats tested, did not have a student risk intake form. Initial Student Interview: Exceptions were noted for 31, or 16%, of the 200 threats tested, did not have an initial student interview. Teacher Input Form: Exceptions were noted for 40, or 20%, of the 200 threats tested, did not have a teacher input form. Clinical Parent Interview: Exceptions were noted for 34, or 21%, of the 165 high/medium level threats tested, did not have a clinical student interview. Clinical Student Interview: Exceptions were noted for 39, or 24%, of the 165 high/medium level threats tested, did not have a clinical student interview. Monitoring Plan: Exceptions were noted for 99, or 60%, of the 165 high/medium level threats tested, did not have a monitoring plan in place.



APPENDIX II: ADDITIONAL INFORMATION

2. TIMELINESS, ACCURACY, AND COMPLETENESS OF THE BEHAVIOR THREAT ASSESSMENT (BTA)

A. Timeliness - Responsiveness

2% (3 samples) of the 200 samples selected, the BTA team did not respond within 24 hours of the initial report, as required by attribute #7 in the 'Attributes Tested' section of this report, however, had documented that the student was either arrested or Baker Acted, which likely caused the delay to the BTA process, as the students were not accessible within the 24 hour timeframe.

A breakdown of the findings by threat level and school type are as follows:

- 2 samples were high-level threats (1 High School, 1 Center)
- 1 sample were medium-level threats (1 Elementary School)

Refer to Observation #2 for more details.

B. Timeliness - Finalization

13% of the 200 samples (25 samples) selected, the BTA was not finalized within 24 hours because the student was either arrested, Baker Acted, or parent delayed the process. Thus, the students were not available within the 24 hour timeframe.

A breakdown of the findings by threat and school type are as follows:

- 11 samples were high-level threats (4 High Schools, 1 Middle School, 6 Centers)
- 13 samples were medium-level threats (4 High Schools, 3 Middle Schools, 3 Elementary Schools, 3 Centers)
- 1 sample were unfounded level threats (1 High School)

Refer to Observation #2 for more details.

C. Completeness

13 samples not included in the 86 samples discussed in **Observation #2**, the BTA was signed by all team members, except the Law Enforcement Officers (LEO), as required by attribute #28 in the 'Attributes Tested' section of this report. The LEO either refused (#1) or was unable to sign (#2). Below is a breakout of the 13 samples by type.

1. LEO refused to sign BTA (10 of the 13 Samples)

- 2 samples were high-level threats (2 Centers)
- 6 samples were medium-level threats (6 *Elementary Schools*)
- 1 sample were low-level threats (1 Elementary School)
- 1 sample were unfounded-level threats (1 Middle School)

2. LEO was unable to sign the BTA (3 of the 13 Samples)

- 2 samples were high-level threats (1 High School, 1 Center)
- 1 sample were low-level threats (1 Center)



APPENDIX II: ADDITIONAL INFORMATION - CONTINUED

4. CLINICAL PARENT AND STUDENT INTERVIEWS

A. Clinical Parent Interview

5% (9 samples) of the 165 high/medium level samples, were missing a clinical parent interview, as required by attribute #15 in the 'Attributes Tested' section of this report, because the parent(s) and/or guardian(s) either refused or were unable to be reached.

A breakdown of the findings by threat level and school type are as follows:

- 4 samples were high-level threats (4 Centers)
- 5 samples were medium-level threats (1 High School, 1 Middle School, 2 Elementary Schools, 1 Center)

Refer to **Observation #4** for more details.

B. Clinical Student Interview

13% (6 samples) of the 165 high/medium level samples, were missing a clinical student interview, as required by attribute #17 in the 'Attributes Tested' section of this report, because the student either refused or was unable to participate.

A breakdown of the findings by threat level and school type are as follows:

- 3 samples were high-level threats (3 Centers)
- 3 samples were medium-level threats (1 High School, 2 Centers)

Refer to Observation #4 for more details.

Internal Audit Report Issued: August 3, 2021



APPENDIX III: BTA PROCESS TIMELINE

BCPS provided the BTA process timeline below.

Spring-Summer 2018

- Review of BTA processes by BCPS staff, as a subset of the Collaborative Education Network review of ESE services received by NC, and then by RSM
- Training to all administrators on BTA processes prior to school year
- SB 7026 Marjory Stoneman Douglas High School Public Safety Act became effective March 9, 2018

Fall 2018

- Training of BTA school-based teams
- BTA processes still paper-based and decentralized
- Design of new SBBC Policy on BTA

Spring 2019

- Adoption of SBBC Policy 2130
- Selection and Procurement of digital, centralized BTA case management data system (BTA module of EdPlan)
- Customization of BTA data system for Florida Statute compliance and BCPS user groups
- SB 7030 Implementation of Legislative Recommendations of the Marjory Stoneman Douglas High School Public Safety Commission became effective 5/9/2019
- BTA Trainings offered throughout Spring 2019

Summer 2019

- Deployment of BTA module of EdPlan
- Training of all school-based administrators and supervisor levels
- Training of all qualifying mental health professionals (e.g., school counselors, school psychologists, school social workers, family therapists)

Fall 2019

- Commencement of first full year of SBBC Policy 2130
- Current Audit commences
- Training of school based BTA teams
- Training of School Resource Officers
- Monitoring of compliance via EdPlan BTA module by principals & Cadre Directors
- In Aug. 2019, FLDOE adopted the Comprehensive School Threat Assessment Guidelines (CSTAG) model for behavioral threat assessment to be used in schools statewide
- BTA Trainings offered throughout Fall 2019

Internal Audit Report Issued: August 3, 2021



APPENDIX III: BTA PROCESS TIMELINE - CONTINUED

Spring 2020

- Retraining of all school-based administers on BTA enhancements
- Move to remote instruction on March 30 after BCPS closure on March 15
- Guidance on conducting virtual BTA meetings
- Closure of Current Audit period

Summer 2020

- Retraining of all school-based administers on BTA enhancements
- Guidance presented to teams on conducting virtual BTA meetings

Fall 2020

- School year opens fully remote
- School operations convert to brick-and-mortar at parental choice on Oct 16
- Procurement process for BTA services contained in RFP #YYY for student services
- Design of Suicide Risk Assessment module independent of BTA module
- FLDOE Office of Safe Schools reviewed Broward's procedures for compliance with statutory requirements and alignment to CSTAG model.
- BTA Trainings converted to a virtual Teams format and offered throughout Fall 2020.

Spring 2021

- Selection and approval of contract for BTA services
- BTA Trainings offered throughout Spring 2021.
- BTA Annual Updates & Review Courses released via Canvas

July 2021

• Trainings commenced for all BCPS school-based administrators

August 2021

• Deployment of enhanced BTA and SRA modules per PCG contract approved by SBBC in May 2021 and funded in June 2022



APPENDIX IV: CONSOLIDATED DISTRICT CABINET RESPONSES



DR. VALERIE S. WANZA, CHIEF OFFICER OFFICE OF SCHOOL PERFORMANCE & ACCOUNTABILITY

PHONE: 754-321-3827 FAX: 754-321-3886 EMAIL: valerie.wanza@browardschools.com

DATE:

July 22, 2021

TO:

Joris Jabouin, Chief Auditor

Office of the Chief Auditor

FROM:

Valerie S. Wanza, Ph.D.

Chief School Performance & Accountability Officer

SUBJECT:

RESPONSE TO RSM BEHAVIORAL THREAT ASSESSMENT AUDIT

This correspondence comes as a response to RSM Compliance Audit for Threat Assessment Procedures. I have read the findings, recommendations, and leadership responses in their entireties. Additionally, I have shared the comprehensive report with my leadership team. The Office of School Performance & Accountability (OSPA) understands the seriousness of the contents of this report.

The OSPA Leadership Team continues to work collaboratively with our colleagues in the Office of Academics, Student Support Initiatives & Recovery, and Safety, Security & Emergency Preparedness to ensure our school leaders receive the appropriate training and support in meeting the processes and procedures outlined in Policy 2130, Behavioral Threat Assessment. This topic is a standing item on my weekly staff meeting agendas. Likewise, principals receive timely communications to assist them in leading this process on their respective campuses.

Understanding the serious nature of this work, my office has conducted and will continue to conduct regular analyses of the behavioral threat assessment procedures and outcomes in our schools. As a result of our internal audits, we have administered disciplinary actions to principals and assistant principals (six suspensions without pay and three letters of reprimand) for non-compliance with this policy. Similarly, we have used the data to inform training needs at schools and potential database enhancements. We will continue our work in this area and respond with the appropriate actions based on our findings.

Again, I want to reiterate my division's steadfast commitment to ensuring the correct application of threat assessment protocols and timelines in all of our schools. We look forward to our continued partnership with our colleagues who support us in this work. Thank you for the opportunity to respond to this comprehensive audit.

VSW:ca

cc:

Brian Katz, Chief Safety & Security Officer

Daniel Gohl, Chief Academic Officer

Dr. Antoine Hickman, Chief Student Support Initiatives & Recovery Officer

Dr. Leo Nesmith, Director, District Administrative Services

OSPA Leadership Team



Office of Safety, Security and Emergency Preparedness Brian Katz, Chief Safety & Security Officer

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The School Board of Broward County, Florida

Dr. Rosalind Osgood, Chair Laurie Rich Levinson, Vice Chair

> Lori Alhadeff Patricia Good Debra Hixon Donna P. Korn Sarah Leonardi Ann Murray Nora Rupert

July 23, 2021

TO:

FROM:

RE:

Brian Katz, Chief Safety & Security Officer Leadership Response to RSM Compliance Audit – Threat Assessment

Procedures

I have carefully reviewed the staff submitted responses to the RSM audit regarding threat assessment procedures as well as the audit findings and recommendations. The threat assessment process is a partnership between District and school-based staff to help identify concerning behavior as early as possible so that proper services can be deployed to our most vulnerable students in partnership with law enforcement and mental health professionals.

Ensuring that the threat assessment process is well crafted and well understood has been a top District priority since prior to my joining the District. When I joined the District in February 2019, the District was in the process of transitioning from the "paper based" threat assessment tracking process to an electronic system and this program has been managed under the Exceptional Student Learning Department for the District.

As a safety and security compliance professional I was pleased to see that the District was focused on examining its processes and procedures and intended to continue to use an outside audit firm to provide recommendations. Given the recency of the relevant statutes governing this work, I believe that showed the importance the District placed and continues to place on this process.

One of the challenges noted in the audit was with law enforcement refusing to sign the paperwork at the conclusion of a BTA. I believe this was based on a lack of clarity as to the role of law enforcement in the BTA (within statute) and a desire of law enforcement to maintain copies of the BTA. We worked closely with our law enforcement partners, included additional language in our School Resource Officer agreements which improved that level of comfort for our law enforcement partners and has increased their willingness to sign the documentation.



As the District's School Safety Specialist designate the progress being made related to threat assimprovement of this program over time, at the	essment and watched the continuous
The audit identified some of the key gaps that the new electronic system. I believe the District the fidelity of implementation for this critical prand responses as appropriate.	et is moving in the right direction to improve



Office of Safety, Security and Emergency Preparedness Leo Nesmith, Task Assigned Chief Safety & Security Officer

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The School Board of Broward County, Florida

Dr. Rosalind Osgood, Chair Laurie Rich Levinson, Vice Chair

> Lori Alhadeff Patricia Good Debra Hixon Donna P. Korn Sarah Leonardi Ann Murray Nora Rupert

July 31, 2021

TO:

Joris Jabouin, Chief Auditor

FROM:

Leo Nesmith, Task Assigned Chief Safety & Security Office

RE:

Task Assigned Chief Safety & Security Officer Response to

RSM Compliance Audit – Threat Assessment Procedures

As the newly appointed Task Assigned Chief Safety and Security Officer, I have read the RSM report and the staff responses compiled by the Academics department as well as the OSPA response and the response from the former Chief Safety and Security Officer.

I recognize the significant amount of work that has been performed by the District since February 2018 and agree with the action plans that I believe will lead to an improved, controlled environment.

My office is committed to participating in the joint OSPA-Academics meetings and collaborating with Dr. Wanza on resolving any accountability issues as noted in the RSM report.



Office of Academics Daniel Gohl, Chief Academic Officer

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The School Board of Broward County, Florida

Dr. Rosalind Osgood, Chair Laurie Rich Levinson, Vice Chair

> Lori Alhadeff Patricia Good Debra Hixon Donna P. Korn Sarah Leonardi Ann Murray Nora Rupert

July 21, 2021

TO: Joris Jabouin, Chief Auditor

FROM: Daniel Gohl, Chief Academic Officer

RE: Staff Response to RSM Compliance Audit – Threat Assessment Procedures

Please find below responses developed by Broward County Public Schools leadership responses to the RSM Compliance Audit – Threat Assessment Procedures.

This is the audit of the 2019-20 school year Behavioral Threat Assessment (BTA) records. This is the first audit conducted under SBBC Policy 2130 adopted in March 2019. Additionally, this audit year was the year in which BCPS deployed the centralized, digital BTA documentation replaced the previous school managed, paper-based, documentation processes which had been used for over a decade. It is also acknowledged that the school year operations were interrupted on March 13, 2020, due to the impact of the COVID-19 pandemic. This impact required that students were physically present at home, or location other than the school building, to receive remote instruction from March 30 through the conclusion of the school year. This required adjustments to threat reporting, investigations, collaborations, and monitoring to adjust to the changed operations of the instructional environment. The evolving statutory, regulatory, and guidance that BCPS has received prior to, during, and after the audit period is provided below.

BCPS places student safety and security as foundational to its responsibility to students and staff. A safe and secure school is a prerequisite for a positive learning environment. Therefore, staff from multiple divisions convened to review the RSM audit, review and implement recommendations contained therein that had not yet been implemented based on process improvements taken in the 2020-21 school year, and develop the responses contained herein. As you will see in the staff responses below, improvement processes had already been undertaken to address the findings from 2019-20 audit period. We are grateful to the Office of the Chief Auditor, and RSM, for the review, recommendations, and opportunity to respond.

1. Student Risk Intake Form



Overview Response

In December 2019, the Student Risk Intake Form was integrated into the BTA process in EdPlan. As a result of this update, administrators are required to initiate the process through the Student Risk Intake Form before proceeding to the Behavioral Threat Assessment process. In June 2020, EdPlan was updated to require the Student Risk Intake to be finalized before proceeding to the Behavioral Threat Assessment process. However, it is important to note that Part 1 of the BTA process captures the very same information (Incident Date, Date Reported, Intended Target, Detailed Narrative, etc.) that is obtained using the Student Risk Intake Form. Therefore, though this specific document, the Student Risk Intake Form, may have been missing, the administrator would have had to gather and enter the very same information in the next step (Part 1) of the BTA. Currently, the information from the Student Risk Intake Form automatically populates into the BTA Part 1.

School-based Response

Principals are required to review Part 1 of the BTA and acknowledge in Ed Plan that all parts of the Behavioral Threat Assessment are completed. The current process in Ed Plan does not allow BTA Team Members to begin Part 2 until all components of Part 1 is completed.

Cadre Based Response

After principals acknowledge a finalized threat assessment, cadre directors complete a Level 2 Acknowledgement to ensure all parts of the Behavioral Threat Assessment are completed in Ed Plan. Cadre Directors receive monthly reports from the Office of Academics and work in conjunction with District staff and school leaders to ensure compliance with school board policy.

Academics-ESLS Based Response

BTA Annual Update and Review Course was released in 2020-2021 to include a review of all mandatory BTA components, including the Student Risk Intake Form. BTA Annual Update and Review Course training recommenced in July 2021 and includes explicit information to address this observation.

Status as of June 30, 2021

Systemically, this issue has been resolved as of June 2020. Currently, the information from the Student Risk Intake Form automatically populates into the BTA Part 1.

2. Overview Response



24 Hour Completion: Per policy 2130 - 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. The manual recommends that, barring extenuating circumstances, the Behavioral Threat Assessment should be completed within 24 hours as a best practice. In extenuating circumstances (e.g., student unavailable due to a Baker Act, parent unavailable for interview until a later time, etc.) administrators are directed to document the reason for the delay. Additionally, if a BTA is not finalized within 24 hours, administrators receive an alert on their EdPlan Dashboard along with an email notifying them of a message in EdPlan. Reports are also pulled from the EdPlan Management System and sent to Cadre Directors for follow up monthly.

In September 2019, guidance was shared with administrators through a PIVOT Memo on how to proceed when a parent and/or student refuses or is unavailable to participate in the required interviews. In November 2020, the EdPlan system was updated to populate the required interviews (per threat level determination) as required fields for all BTA's. BTA's cannot be finalized until all required fields are completed. The BTA Manual revision (December 2020, pg. 23-24) also included guidance on how to proceed when parent and/or student refused to participate or were unavailable to participate in the required interviews.

Signatures: A report is pulled from the EdPlan Management System to identify if there are BTA Signature Pages missing. Currently, District staff and cadre directors follow up with all schools monthly to ensure that all signature pages are correctly attached to each Behavioral Threat Assessment. In August 2020, Participation Type selections were added to the Signature Page for the team to indicate when a team member participated even if they chose not to sign the document. For all Signature Pages that were identified as missing through this audit, the school was contacted in May and June of 2021. OSPA obtained hard copies of 72 of the 86 signature pages. For the remaining fourteen missing signature pages the school provided a reasonable explanation.

TERMS: The Instructional Technology Department runs weekly reports on TERMS entries associated with BTA's in EdPlan. The report is shared with District staff to follow up and ensure that BTA's are entered into TERMS.

School-based Response

Principals are responsible for ensuring that a completed signature page with all required signatures is correctly attached to the Behavioral Threat Assessment in Ed Plan.

2. Overview Response (continued)

Cadre Based Response



After principals acknowledge a finalized threat assessment, Cadre Directors complete a Level 2 Acknowledgement to ensure all parts of the Behavioral Threat Assessment are completed in Ed Plan. Cadre Directors receive monthly reports from the Office of Academics of Behavioral Threat Assessments with no signature page attached. Cadre directors work in conjunction with District staff and school leaders to ensure compliance with uploading and attaching the signature page in Ed Plan.

Academics-ESLS Based Response

BTA Annual Update and Review Course was released in 2020-2021 to include a review of all mandatory BTA components and the policy language related to responding to any report of a threat within 24 hours. This training also included a review of procedures for obtaining, documenting, and uploading Signature Pages.

Status as of June 30, 2021

For the 2020 – 2021 school year, 100% of the Behavioral Threat Assessments completed had a signature page correctly attached.

3. Initial Student Interview/Teacher Input Form

Overview Response



In November 2020, the EdPlan system was updated to populate the Initial Student Interview and Teacher Input Form as required fields for all BTA's. These entries must be completed before finalizing the BTA. Additionally, the BTA Manual was updated in December 2020 to include guidance on how to proceed when a parent and/or student is unable to/refuses to participate (pp. 23 – 24).

School-based Response

Principals are required to review the Student Interview and Teacher Input Form of the BTA and acknowledge in Ed Plan that all parts of the Behavioral Threat Assessment are completed. As of December 2020, the manual provides principals guidance on how to proceed when a parent and/or student is unable to/refuses to participate (pp. 23 - 24)

Cadre Based Response

After principals acknowledge a finalized threat assessment, cadre directors complete a Level 2 Acknowledgement to ensure all parts of the Behavioral Threat Assessment are completed in Ed Plan. Cadre Directors receive monthly reports from the Office of Academics and work in conjunction with District staff and school leaders to ensure compliance if any components of the Behavioral Threat Assessment are missing.

Academics-ESLS Based Response

BTA Annual Update and Review Course was released in 2020-2021 to include a review of all mandatory BTA components, including Initial Student Interviews and Teacher Input Forms.

Status as of June 30, 2021

For the 2020 - 2021 school year, 100% of finalized Behavioral Threat Assessments have a completed Student Interview and Teacher Input Form included as the system will not allow a Behavioral Threat Assessment to be finalized without a completed Student Interview and Teacher Input Form

4. Clinical Student/Parent Interview & Mental Health Professional: Overview Response

In November 2020, the EdPlan system was also updated to populate the Clinical Parent & Student Interviews as required fields for all Substantive Risk Level



determinations. These entries must be completed before finalizing the BTA. BTA Manual revision (December 2020, pg. 23-24) included guidance on how to proceed when parent and/or student refused to participate or were unavailable to participate in the required interviews. When principals and Cadre Directors acknowledge the finalized BTA's they review completion of all required documents, to include the Clinical Student Interviews, when required (all substantive threats).

Ed Plan User Type Permissions were updated in January 2021, so that only mental health professionals can complete the clinical interviews. Administrators currently do not have the capability to complete a clinical interview in the EdPlan system.

School-based Response

Principals are required to review the Clinical Parent and Student Interviews of the BTA when applicable and acknowledge in Ed Plan that all parts of the Behavioral Threat Assessment are completed. As of December 2020, the manual provides principals guidance on how to proceed when a parent and/or student is unable to/refuses to participate (pp. 23 – 24)

Cadre Based Response

After principals acknowledge a finalized threat assessment, cadre directors complete a Level 2 Acknowledgement to ensure all parts of the Behavioral Threat Assessment are completed in Ed Plan. Cadre Directors receive monthly reports from the Office of Academics and work in conjunction with District staff and school leaders to ensure compliance if any components of the Behavioral Threat Assessment are missing.

<u>Academics-ESLS Based Response</u>

BTA Annual Update and Review Course was released in 2020-2021 to review all mandatory BTA components.

Status as of June 30, 2021

For the 2020 - 2021 school year, 100% of finalized Behavioral Threat Assessments have a completed Clinical Student and Parent Interview when applicable included as the system will not allow a Behavioral Threat Assessment to be finalized without a completed Student Interview and Teacher Input Form.

5. Monitoring Plans

Overview Response

Initially, when the system was first developed, Monitoring Plans could not be printed. Therefore, a signature page could not be generated for teams to utilize.



This was updated in March 2020. The School Administrator's EdPlan Dashboard view was also updated in January 2021 to provide the ability to monitor outstanding/open Monitoring Plans. Alerts regarding open/outstanding Monitoring Plans are also posted to the school administrator's EdPlan Message board and an email is sent to them notifying them of a new message in EdPlan. EdPlan was also updated in January 2021 to auto-generate Monitoring Plans for all Substantive level threats.

Reports are pulled from the EdPlan Management system monthly and shared with cadre directors for follow up when monitoring plans are not finalized.

The feature to revise/review Monitoring Plans was added to EdPlan in August 2020. BTA Manual revision (December 2020, pg. 41) included guidance on how to complete Monitoring Plan reviews and revisions.

For the Monitoring Plans that were identified as missing, follow up was completed by the Office of School Climate and Discipline and Office of Academics in May and June of 2020 to ensure students were receiving the required support based on the identified incident. All monitoring plans were in place as of June 2021. District staff is in the process of reviewing to determine if Monitoring Plans are complete for incidents outside of the audit and will finalize their conclusions by September 30, 2021.

School-based Response

Principals are required to ensure monitoring plans are developed and implemented with fidelity when applicable and acknowledge in Ed Plan that all parts of the Behavioral Threat Assessment are completed. Alerts regarding open/outstanding Monitoring Plans are also posted to the school administrator's EdPlan Message board and an email is sent to them notifying them of a new message in EdPlan.

Cadre Based Response

The Office of Academics shares monthly reports and collaborates with cadre directors on a regular basis to follow up with principals when a monitoring plan is not in compliance with school board policy.

5. Monitoring Plans (continued)

Academics-ESLS Based Response

BTA Annual Update and Review Course was released in 2020-2021 to review all mandatory BTA components, including Monitoring Plans.



Status as of June 30, 2021

Beginning in January 2021, Ed Plan was updated to provide the ability to monitor outstanding/open Monitoring Plans. At the close of the 2020 – 2021 school year 100% of monitoring plans were closed and in compliance with policy.

Additional Considerations for Overall Process Improvements

The District accepts the recommendations to establish and train staff on standardized file naming conventions to improve file storage navigation for system users. Additionally, staff will review, and where appropriate, work to ensure that file storage locations are consistent across locations.

Digital signature functionality was previously identified by the District as an area of improved functionality. Adobe Sign was enabled for the period remote learning, digital parent signatures have been enabled for IEPs and are being extended to BTA, and a comprehensive, integrated solution is being enabled for the 2021-22 school year.

BTA Process Update Timeline

Spring-Summer 2018

- Review of BTA processes by BCPS staff, as a subset of the Collaborative Education Network review of ESE services received by NC, and then by RSM
- Training to all administrators on BTA processes prior to school year
- SB 7026 Marjory Stoneman Douglas High School Public Safety Act became effective March 9, 2018



Fall 2018

- Training of BTA school-based teams
- BTA processes still paper-based and decentralized
- Design of new SBBC Policy on BTA

Spring 2019

- Adoption of SBBC Policy 2130
- Selection and Procurement of digital, centralized BTA case management data system (BTA module of *EdPlan*)
- Customization of BTA data system for Florida Statute compliance and BCPS user groups
- SB 7030 Implementation of Legislative Recommendations of the Marjory Stoneman Douglas High School Public Safety Commission became effective 5/9/2019
- BTA Trainings offered throughout Spring 2019

Summer 2019

- Deployment of BTA module of EdPlan
- Training of all school-based administrators and supervisor levels
- Training of all qualifying mental health professionals (e.g., school counselors, school psychologists, school social workers, family therapists)

Fall 2019

- Commencement of first full year of SBBC Policy 2130
- Current Audit commences
- Training of school based BTA teams
- Training of School Resource Officers
- Monitoring of compliance via EdPlan BTA module by principals & Cadre Directors
- In Aug. 2019, FLDOE adopted the Comprehensive School Threat Assessment Guidelines (CSTAG) model for behavioral threat assessment to be used in schools statewide
- BTA Trainings offered throughout Fall 2019

Spring 2020

- Retraining of all school-based administers on BTA enhancements
- Move to remote instruction on March 30 after BCPS closure on March 15
- Guidance on conducting virtual BTA meetings
- Closure of Current Audit period

Summer 2020

Retraining of all school-based administers on BTA enhancements



• Guidance presented to teams on conducting virtual BTA meetings

Fall 2020

- School year opens fully remote
- School operations convert to brick-and-mortar at parental choice on Oct 16
- Procurement process for BTA services contained in RFP #YYY for student services
- Design of Suicide Risk Assessment module independent of BTA module
- FLDOE Office of Safe Schools reviewed Broward's procedures for compliance with statutory requirements and alignment to CSTAG model.
- BTA Trainings converted to a virtual Teams format and offered throughout Fall 2020.

Spring 2021

- Selection and approval of contract for BTA services
- BTA Trainings offered throughout Spring 2021.
- BTA Annual Updates & Review Courses released via Canvas

July 2021

• Trainings commenced for all BCPS school-based administrators

August 2021

 Deployment of enhanced BTA and SRA modules per PCG contract approved by SBBC in May 2021 and funded in June 2022

<u>Chronology of Events, Reports Received, and Actions Taken</u>

Feb. 14, 2018	Tragedy at MSD HS
April 2018	Request for review of ESE Services to NC to be conducted by Collaborative Education Network (CEN)
June 2018	Initial Broward League of Cities (BLOC) Report on MSD Tragedy



Report: http://browardleague.org/wp-

content/uploads/2018/06/BLOC PUBLICSAFETY TASKFORCE FINA

L RR 6 2 18 PM1.pdf

Appendix: http://browardleague.org/appendix/

June 2018 CEN report received by BCPS

Court Redacted Version:

https://www.browardschools.com/cms/lib/FL01803656/Centricity

/Domain/14019/CEN%20Report-Redacted.pdf

July 2018 BCPS Presentation to MSD PSC on BTA

http://www.fdle.state.fl.us/MSDHS/Meetings/July-Meeting-Documents/Presentations/July-10-100pm-BCPS-Threat-

Assessment-Mary-Mucenic.aspx

July 2018 Request for review of BTA implementation practices in schools to

be conducted by RSM

July 2018 BCPS commences design of SBBC Policy on BTA

July 2018 Training of all BCPS school-based administrators, administrator's

supervisors, qualifying mental health providers

November 2018 RSM Review of BTA implementation received by BCPS

December 2018 Release of Federal Commission on School Safety Report

https://accentdistributing.com/wp-

content/uploads/2020/09/school-safety-report.pdf

January 2019 Release of First MSD PSC Interim Report

January 2019 Initial BCPS Response to First MSD PSC

https://www.browardschools.com/site/default.aspx?PageType=3 &DomainID=14019&ModuleInstanceID=62364&ViewID=6446EE88-

D30C-497E-9316-

3F8874B3E108&RenderLoc=0&FlexDataID=119181&PageID=39208

March 2019 BCPS approves first SBBC Policy on BTA (Policy 2130)

http://bcpsagenda.browardschools.com/agenda/01613/Item%2

0CC-1%20(58035)/index.html



June 2019 MSD PSC Presentation on BTA

http://www.fdle.state.fl.us/MSDHS/Meetings/2019/June/June-4-

2019-230-Threat-Assessmeth-Dan-Gohl-BCPS.aspx

July 2019 Release of First Interim Report by 20th Florida Statewide Grand Jury

http://myfloridalegal.com/webfiles.nsf/WF/GPEY-

BE8QUU/\$file/1st+Interim+Rpt.pdf

August 2019 Release of MSD Report by National Police Foundation

https://www.policefoundation.org/wp-

content/uploads/2019/08/Broward-Final-.pdf

August 2019 Updated BLOC Report

Report: http://browardleague.org/wp-

content/uploads/2019/08/BLOC_PUBLICSAFETY_TASKFORCE_FINA

L 8 13 19 Report Recommendations.pdf

Appendix: http://browardleague.org/additional-appendix-items/

August 2019 Major Revision to BCPS BTA Procedure Manual

https://www.browardschools.com/cms/lib/FL01803656/Centricity

/Domain/13477/2019_BTA_Procedure_Manual.pdf

August 2019 Training of all BCPS school-based administrators, administrator's

supervisors, qualifying mental health providers

Fall 2019 Training of all school based BTA teams

November 2019 Release of Second Interim Report of MSD PSC

http://www.fdle.state.fl.us/MSDHS/MSD-Report-2-Public-

Version.pdf

December 2019 Release of Second Interim Report by 20th Florida Statewide Grand

Jury

http://myfloridalegal.com/webfiles.nsf/WF/GWRY-BJS47Q/\$file/20SGJ+Second+Interim+Report.pdf

May 2020 FL DOE Releases "Model Behavioral Threat Assessment Policies

and Best Practices for K-12 Schools" Guidance

https://www.fldoe.org/core/fileparse.php/18612/urlt/threat-

assessment-model-policies.pdf



August 2020 Training of all BCPS school-based administrators, administrator's

supervisors, qualifying mental health providers

December 2020 Release of Third Interim Report by 20th Florida Statewide Grand

Jury

http://myfloridalegal.com/webfiles.nsf/WF/CPAL-

BW6T2Q/\$file/3rd+Interim+Report.pdf

December 2020 Update to BCPS BTA Procedure Manual http://bcps-

mentalhealth.com/downloads/BTA_Procedure_Manual_2020.pdf

June 2021 SBBC approves new contract with PCG for enhanced BTA and

SRA module deployment

July 2021 Scheduled BTA trainings and Annual Update trainings for BTA

Team members commenced.

August 2021 Anticipated deployment of Enhanced BTA and SRA modules

Chronology of EdPlan BTA Enhancements October 2019 – February 2021

October 2019 Features

- 1. New Domain: Threat Assessment this will allow for a unique/defined threat assessment team and the ability to set all associated page and document permissions for a user type based on this structure
- 2. User level permission:
 - a. 'Can Interview Threat' will allow this user's name to pull into the Interviewed By: field



- b. Checkbox for "Receive STA Alerts" if this is selected, the user will receive Alerts for every student at a school they are assigned to: 1) when a threat is finalized, 2) when a plan is finalized, 3) when a threat is overdue for finalization, 4) when a plan is overdue for finalization, 5) when a plan is overdue for review
- c. Checkbox for "STA Approver" on individual user info page—if this is selected, the user will receive the same alerts as above but this person will also see an 'Reviewed/Approved' button on the bottom for any student in their assigned schools.
- d. Add the ability to delete a finalized threat or monitoring plan this should be based on a user type permission

Threat Assessment FI Updates

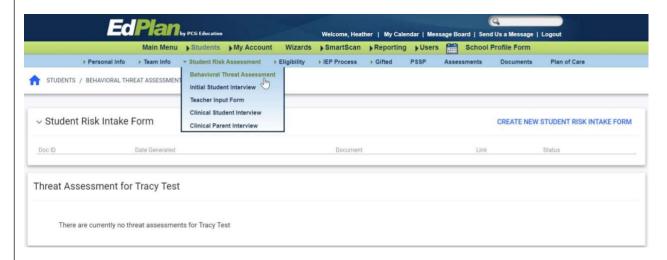
- 1. On Part I: Incident information: we need to add optional fields for Threat Reported:
 - Who took the initial report of the incident?
 - Date? Time?
 - What is their position/affiliation to the school?
- 2. Under the Records Review section, they want the ability to indicate 'Reviewed' 'Not Applicable' 'Not Available' as a new dropdown field instead of just one overall check box make the options configurable
 - 2.1. Make 'Name of Reviewer' and 'Title of Reviewer' optional fields, not required
- 3. On the Analysis page, make 'Notify Level Associate' and 'Notify Law Enforcement' fields configurable/optional as to whether to include on the page; so they might not show at all
- 4. Notify Law Enforcement appears on both the first page and the last page if info has been entered on the first step, it should pull over into the last step to alert users that it has already happened
- 5. On the Analysis page of the threat assessment, under the 'Notify Law Enforcement' heading, would like to add a checkbox that says 'N/A low or medium threat' so that it is clear notifying law enforcement is not something required
- 6. Add a new configurable info box under 'Action Steps'
- 7. Move the STAActionSteps list to be above the Identify Responses section; make these checkboxes and add required fields for Person Responsible, Role, and Date
- 8. Make the 'Action Steps' label a configurable
- 9. Remove Date School Threat Assessment Completed and SMS Incident Number fields from Analysis tab



- 10. Add a new field on the Monitoring Plan page customizable wording that could hold information about what has taken place since the last monitoring plan was put in place, etc.
- 11. Push the 'Action Steps' and 'Identify Responses' into the monitoring plan.

December 2019 Features

The primary update in this release is the integration of the Student Risk Intake Form (SRIF) into the overall Threat Assessment process. Users will no longer see a separate Student Risk Intake Form page; instead, you will see a new overall tab named "Student Risk Assessment". When you click the first option for "Behavioral Threat Assessment", you will see a new section and button to 'Create New Student Risk Intake Form'.



Complete the SRIF as normal. Once you finalize the SRIF, if you have selected "Threat to Others" you will see a button that says "Proceed to BTA".

A few other minor updates also included in this release:

- Part 2: added an optional check box next to the student interview for the user to indicate "Student not available for interview at this time" if necessary
- Part 3: added a Parent Notification section; includes Parent Name, Date Notified, Time, and Outcome
- Part 3: After the risk level is chosen, there is a new 'Basis for Determination' text box for the team to describe their decision



A button to 'View Batch' (interviews and other files 'attached' in the process)
after the threat assessment has been finalized; this will create a single PDF with
the BTA document and all of the attachments related to that threat



March 2020 Features

- On the Initial Risk Intake page: add 'Not a Threat' as an option along with Threat to Self and Threat to Others (configurable option); if this is selected, the process would end and not proceed into BTA or SRA
- 2. BTA Part 1: Make the IncidentType an optional field
- 3. BTA Part 2: Add a 'Time of Interview' field to each interview line in the table
 - a. Add a configurable title to the Threat History panel on Part 2
- 4. BTA/SRA Part 3:
 - a. Remove the 'info box' symbol next to the actual questions in this section
 - b. Add an info box under Meeting Participants label
 - c. Add an option to make the info boxes (instructions) of STAAnalysisCategories open a pop-up modal to accommodate very long descriptions
 - d. Make the 'Basis for Determination' label and field optional
 - e. Identify Responses (Action Types): Extend the narrative fields across the page
 - f. Increase space between the risk level options
 - g. Add a question under the proceed to SRA panel a button to proceed to SRA will only appear if 1) threat to self was selected on the SRIF, or 2) the answer to this question is Yes
- 5. Monitoring Plan:
 - a. Move the Discipline Section on the Monitoring Plan from the top to the bottom of the page; make the question language/labels configurable; make them optional on the page
 - b. Have the Meeting Participants on the Monitoring Plan pull from a dropdown of BTA Team members
 - c. Add an info box under Further Actions title
 - d. The 'View Monitoring Plan' dropdown date will be the plan begin date instead of plan finalized date; also making this label configurable



e. When a new monitoring plan (review) is created, the existing begin date, meeting date, and review date will no longer pull over from the previous iteration – these will now be blank when a plan is being reviewed

6. SRA:

- a. Remove "Incident Type" and "DMS Incident Number" fields from the first panel
- b. Analysis (Part III): Add a "Parent Notification" panel between the Risk panel and the Actions panel. This will be just like the Parent Notification panel that is being added to
- c. Add a "Meeting Participants" section at the end of the Actions panel, right above the button to finalize the SRA. This will be just like the "Meeting Participants" section currently on the BTA in the same place, but it will pull from the SRA team instead of the BTA team
- d. Student Safety and Support Plan: Add a page note/i-box for instructions just under the "Safety and Support Plan Steps" header
- 7. Acknowledge Button/Can Approve Action:
 - a. Two levels of acknowledgement; ex. a finalized threat goes to the Principal for review/acknowledgement first, then once the Principal has acknowledged, it is sent/alerts a second user type for approval
 - b. A way to easily see which threats on the dashboards have been acknowledged by you (one color symbol) or acknowledged by someone else (different color symbol) with a hover-over pop-up to describe the meaning of the colors
 - c. Separate permissions for acknowledging Threat Assessments and acknowledging Monitoring Plans
 - d. Enhance email alert capabilities to allow alerting users of a specific user type when a threat has been acknowledged (independent of the permission to receive the other alerts).
 - e. Make 'Can Approve Threat' a usertype-level permission in addition to the current userlevel permission.

8. Alerts:

- a. Update alerts for the option to send only to those users of a given usertype when they are on the student's BTA team
- b. Add link to take the user to the student's threat in the messages that are sent when threats are finalized
- 9. Dashboard:



- a. Default the dashboard drilldown results layout to show the most recent finalized threats first – currently defaults to showing them in order from threat start date
- b. Make the colors on the dashboard reflect the priority levels of the threat

 ex. make the Medium level threat orange and the High level threat
 red
- c. Show only the current active plan in the monitoring dashboard widget drilldown
- 10. An option for all alerts that count days to be based on the District Calendar; currently, they are based on the individual school calendar for the student 11. List updates:
 - a. Add 'multi-select' as an option for the STAActionTypes list
 - b. Need to increase character limit on STAAnalysisQuestions list
 - c. Add a code/option to the STARecordsReviewStatuses list that would remove the error checks for that category if that option is selected e.g., a status of 'Not Applicable' should not require the description, name or title of reviewer
 - d. Update the 'default' functionality of the STAInterviewRoleTypes to allow for more than one default
- 12. Change the word 'Open' to 'Create' for the Monitoring Plan button

March 2020 Document Enhancements

- 1. BTA document updates
 - a. Add "Location" and "Time" fields in Part I, Incident Information.
 - b. Add law enforcement name to Actions section if law enforcement was contacted.
 - c. Add Parent Notification section below Risk section.
 - d. Add interview time fields for interview rows in Part II.
- 2. Witness Interview Document added in system

June 2020 Features

1. BTA page-level access for user types. User types can be given edit and view access to individual parts of the process.

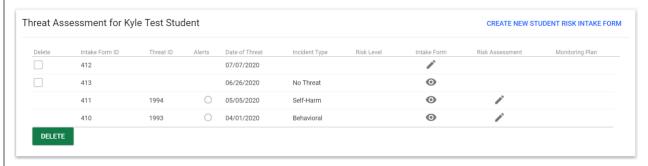


Name	Relationship	Allow BTA Access	Allow SRA Access
Jacquelyn Test	Teacher	€	
Lois Test	Teacher - Woody Test	€	
Maria Test	Teacher		
* Carol Test	Teacher	€	
* Donna Test	Teacher	€	
* John Test	Teacher		

2. Allow at the School Level ability to set a School-Based Core BTA Team that would automatically set that team for each student. The team would be prefilled for each student automatically based on the Core school Team.



3. Student Risk Intake Form – ability to delete draft documents



4. Allow for 'draft' threat and risk assessments to allow for a draft document to be created before finalizing the process.





- 5. Dashboard Updates:
 - a. Add incident date
 - b. Change compliance so once it has been satisfied, switch from red exclamation to green check



August 2020 Features

User Permissions

New user permissions will allow user types to be identified as viewing Own Students, Students in Own Schools, or All Schools for both BTA and SRA processes. This will allow the central administration team to no longer need to be on the students team in order to view the processes.

Dashboards

Increased font size for numbers on the dashboards:



Student Risk Assessment Landing Page

New landing page streamlining the process flow for BTA and SRA Users will only see Risk Assessment lines if they have access to view that particular type. For example, a user who is on the BTA team but not the SRA team will only see Behavioral lines in the screenshot below.





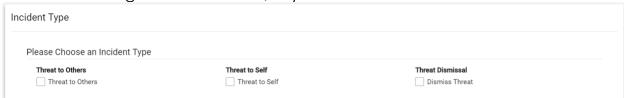
Student Risk Intake Form

The **Location of Incident** field has been turned into a configurable checklist. Previous locations will be tracked in the "Other" free text field.



The **Incident Type** decision tree has been updated to better display the three paths out of the SRIF.

(note: Threat Dismissal is being renamed to Not a Threat on the testing site and will still remain configurable to turn on/off)



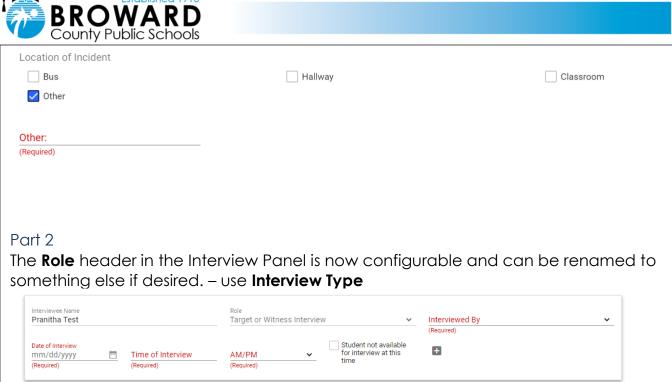
The proceed to BTA/SRA buttons no longer appear. Now, when an SRIF is finalized, it automatically creates a threat assessment for the items that are selected, or will end the process if Dismiss Threat is selected.

Behavioral Threat Assessment

Part 1

Location of Incident will be a checklist and will pull forward from the new checklist in the SRIF





The **Records Review** Section will now offer a "Copy from Previous" button if there has been another Behavioral Threat Assessment completed in the same school year.



Part 3

+

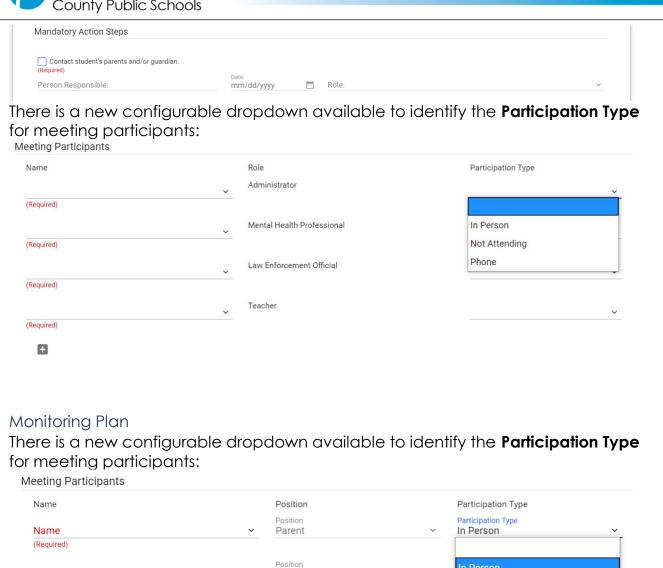
Mandatory Action Steps now display in one line across the page again:



Name

 \pm

(Required)



In Person

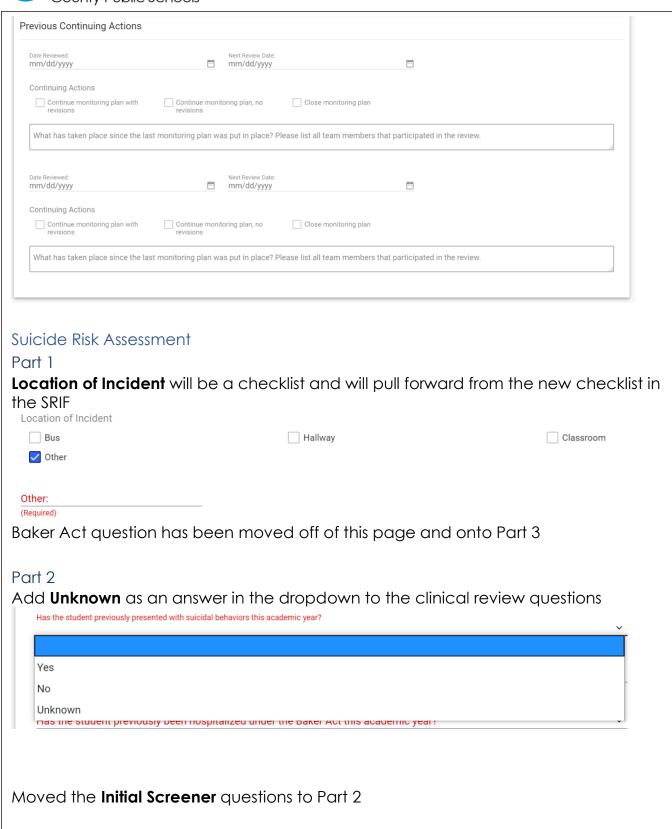
Not Attending

Phone

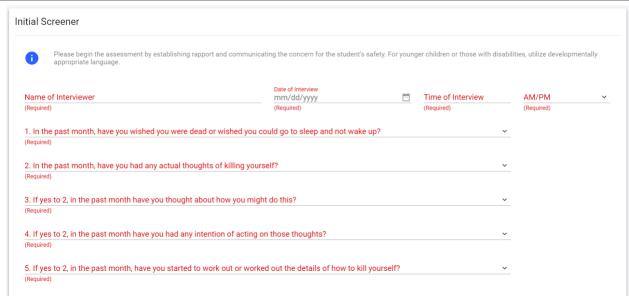
New Panel for **Previous Continuing Actions** to see the outcome of any previous reviews to the Monitoring Plan.

Administrator

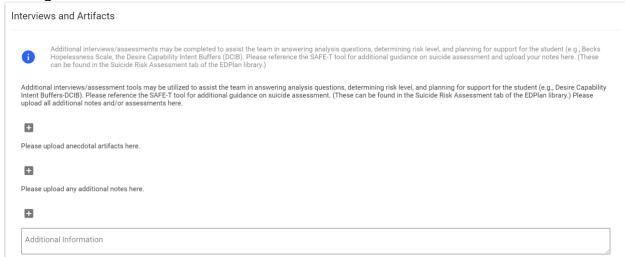








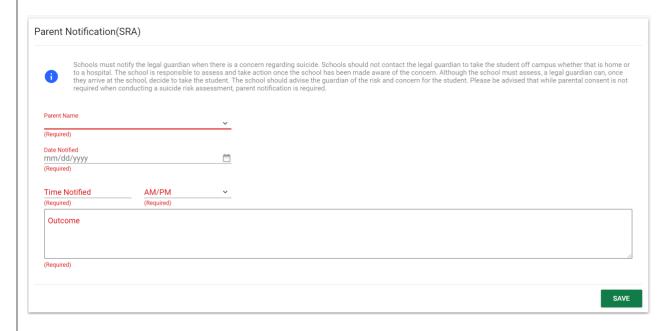
Interviews and Artifacts can now hold an **Additional Information** text field with configurable label,



Part 3

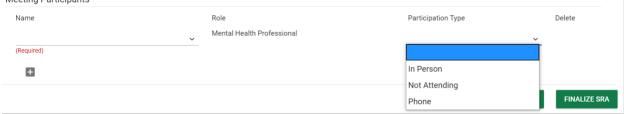


Parent Notification can now be configured to be optionally required or displayed/hidden.



Baker Act question moved from Part 1 Was a Baker Act initiated? Yes Yes

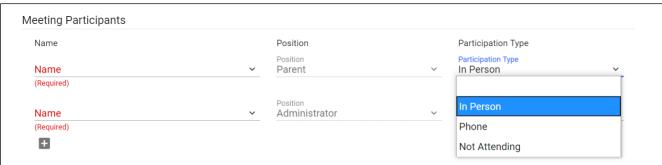




Support Plan

There is a new configurable dropdown available to identify the **Participation Type** for meeting participants:





New Panel for **Previous Continuing Actions** to see the outcome of any previous reviews to the Support Plan.

December 2020 Features

School Profile Form update: Changes made to the school profile form for the Core BTA and Core SRA teams will now automatically update the school's core team pages when a new SPF is finalized for a school.

General Resources

BCPS BTA Website: http://bcps-mentalhealth.com/threatAssessment.php

FL DOE BTA Website: https://www.fldoe.org/safe-schools/threat-assessment.stml

PCG BTA Website: <a href="https://publicconsultinggroup.com/education/education-educat

products/edplan-student-behavioral-threat-assessment-bta-

solution-and-suicide-risk-assessment-sra-solution/

Issued: August 3, 2021



APPENDIX V: EDPLAN/BTA MODULAR UPDATE

BCPS provided the EdPlan system and BTA modular updates from October 2019 to December 2020 below.

October 2019 Features

- 1. New Domain: Threat Assessment this will allow for a unique/defined threat assessment team and the ability to set all associated page and document permissions for a user type based on this structure
- 2. User level permission:
 - a. 'Can Interview Threat' will allow this user's name to pull into the Interviewed By: field
 - b. Checkbox for "Receive STA Alerts" if this is selected, the user will receive Alerts for every student at a school they are assigned to: 1) when a threat is finalized, 2) when a plan is finalized, 3) when a threat is overdue for finalization, 4) when a plan is overdue for finalization, 5) when a plan is overdue for review
 - c. Checkbox for "STA Approver" on individual user info page— if this is selected, the user will receive the same alerts as above but this person will also see an 'Reviewed/Approved' button on the bottom for any student in their assigned schools.
 - d. Add the ability to delete a finalized threat or monitoring plan this should be based on a user type permission

Threat Assessment FI Updates

- 1. On Part I: Incident information: we need to add optional fields for Threat Reported:
 - Who took the initial report of the incident?
 - Date? Time?
 - What is their position/affiliation to the school?
- 2. Under the Records Review section, they want the ability to indicate 'Reviewed' 'Not Applicable' 'Not Available' as a new dropdown field instead of just one overall check box make the options configurable
 - 2.1. Make 'Name of Reviewer' and 'Title of Reviewer' optional fields, not required
- 3. On the Analysis page, make 'Notify Level Associate' and 'Notify Law Enforcement' fields configurable/optional as to whether to include on the page; so they might not show at all
- 4. Notify Law Enforcement appears on both the first page and the last page if info has been entered on the first step, it should pull over into the last step to alert users that it has already happened
- 5. On the Analysis page of the threat assessment, under the 'Notify Law Enforcement' heading, would like to add a checkbox that says 'N/A low or medium threat' so that it is clear notifying law enforcement is not something required
- 6. Add a new configurable info box under 'Action Steps'
- 7. Move the STAActionSteps list to be above the Identify Responses section; make these checkboxes and add required fields for Person Responsible, Role, and Date
- 8. Make the 'Action Steps' label a configurable
- 9. Remove Date School Threat Assessment Completed and SMS Incident Number fields from Analysis tab
- 10. Add a new field on the Monitoring Plan page customizable wording that could hold information about what has taken place since the last monitoring plan was put in place, etc.
- 11. Push the 'Action Steps' and 'Identify Responses' into the monitoring plan

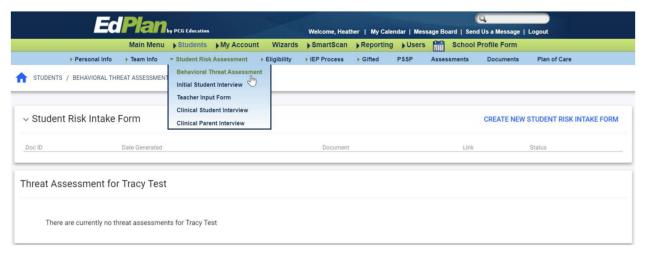
Issued: August 3, 2021



APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

December 2019 Features

The primary update in this release is the integration of the Student Risk Intake Form (SRIF) into the overall Threat Assessment process. Users will no longer see a separate Student Risk Intake Form page; instead, you will see a new overall tab named "Student Risk Assessment". When you click the first option for "Behavioral Threat Assessment", you will see a new section and button to 'Create New Student Risk Intake Form'.



Complete the SRIF as normal. Once you finalize the SRIF, if you have selected "Threat to Others" you will see a button that says "Proceed to BTA". A few other minor updates also included in this release:

- Part 2: added an optional check box next to the student interview for the user to indicate "Student not available for interview at this time" if necessary
- Part 3: added a Parent Notification section; includes Parent Name, Date Notified, Time, and Outcome
- Part 3: After the risk level is chosen, there is a new 'Basis for Determination' text box for the team to describe their decision.
- A button to 'View Batch' (interviews and other files 'attached' in the process) after the threat assessment has been finalized; this will create a single PDF with the BTA document and all of the attachments related to that threat



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APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

March 2020 Features

- 1. On the Initial Risk Intake page: add 'Not a Threat' as an option along with Threat to Self and Threat to Others (configurable option); if this is selected, the process would end and not proceed into BTA or SRA
- 2. BTA Part 1: Make the IncidentType an optional field
- 3. BTA Part 2: Add a 'Time of Interview' field to each interview line in the table
 - a. Add a configurable title to the Threat History panel on Part 2
- 4. BTA/SRA Part 3:
 - a. Remove the 'info box' symbol next to the actual questions in this section
 - b. Add an info box under Meeting Participants label
 - c. Add an option to make the info boxes (instructions) of STAAnalysisCategories open a pop-up modal to accommodate very long descriptions
 - d. Make the 'Basis for Determination' label and field optional
 - e. Identify Responses (Action Types): Extend the narrative fields across the page
 - f. Increase space between the risk level options
 - g. Add a question under the proceed to SRA panel a button to proceed to SRA will only appear if 1) threat to self was selected on the SRIF, or 2) the answer to this question is Yes
- 5. Monitoring Plan:
 - a. Move the Discipline Section on the Monitoring Plan from the top to the bottom of the page; make the question language/labels configurable; make them optional on the page
 - b. Have the Meeting Participants on the Monitoring Plan pull from a dropdown of BTA Team members
 - c. Add an info box under Further Actions title
 - d. The 'View Monitoring Plan' dropdown date will be the plan begin date instead of plan finalized date; also making this label configurable
 - e. When a new monitoring plan (review) is created, the existing begin date, meeting date, and review date will no longer pull over from the previous iteration these will now be blank when a plan is being reviewed
- 6. SRA:
 - a. Remove "Incident Type" and "DMS Incident Number" fields from the first panel
 - b. Analysis (Part III): Add a "Parent Notification" panel between the Risk panel and the Actions panel. This will be just like the Parent Notification panel that is being added to
 - c. Add a "Meeting Participants" section at the end of the Actions panel, right above the button to finalize the SRA. This will be just like the "Meeting Participants" section currently on the BTA in the same place, but it will pull from the SRA team instead of the BTA team
 - d. Student Safety and Support Plan: Add a page note/i-box for instructions just under the "Safety and Support Plan Steps" header

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APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

- 7. Acknowledge Button/Can Approve Action:
 - a. Two levels of acknowledgement; ex. a finalized threat goes to the Principal for review/acknowledgement first, then once the Principal has acknowledged, it is sent/alerts a second user type for approval
 - b. A way to easily see which threats on the dashboards have been acknowledged by you (one color symbol) or acknowledged by someone else (different color symbol) with a hover-over pop-up to describe the meaning of the colors
 - c. Separate permissions for acknowledging Threat Assessments and acknowledging Monitoring Plans
 - d. Enhance email alert capabilities to allow alerting users of a specific user type when a threat has been acknowledged (independent of the permission to receive the other alerts).
 - e. Make 'Can Approve Threat' a usertype-level permission in addition to the current userlevel permission.
- 8. Alerts:
 - a. Update alerts for the option to send only to those users of a given usertype when they are on the student's BTA team
 - b. Add link to take the user to the student's threat in the messages that are sent when threats are finalized
- 9. Dashboard:
 - a. Default the dashboard drilldown results layout to show the most recent finalized threats first currently defaults to showing them in order from threat start date
 - b. Make the colors on the dashboard reflect the priority levels of the threat ex. make the Medium level threat orange and the High level threat red
 - c. Show only the current active plan in the monitoring dashboard widget drilldown
- 10. An option for all alerts that count days to be based on the District Calendar; currently, they are based on the individual school calendar for the student
- 11. List updates:
 - a. Add 'multi-select' as an option for the STAActionTypes list
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Issued: August 3, 2021



APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

June 2020 Features

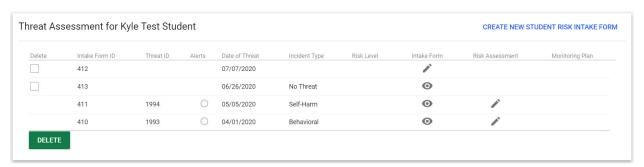
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Lois Test	Teacher - Woody Test	€			
Maria Test	Teacher				
* Carol Test	Teacher	€			
* Donna Test	Teacher	€			
* John Test	Teacher				
* View-Only					

2. Allow at the School Level ability to set a School-Based Core BTA Team that would automatically set that team for each student. The team would be prefilled for each student automatically based on the Core school Team.



3. Student Risk Intake Form – ability to delete draft documents



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APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

4. Allow for 'draft' threat and risk assessments to allow for a draft document to be created before finalizing the process.



- 5. Dashboard Updates:
 - a. Add incident date
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New user permissions will allow user types to be identified as viewing Own Students, Students in Own Schools, or All Schools for both BTA and SRA processes. This will allow the central administration team to no longer need to be on the students team in order to view the processes.

Dashboards

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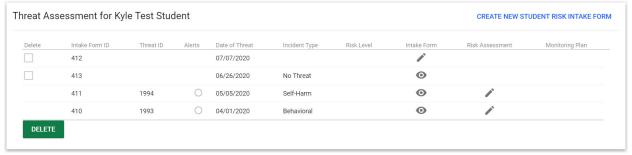


APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

Student Risk Assessment Landing Page

New landing page streamlining the process flow for BTA and SRA

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Student Risk Intake Form

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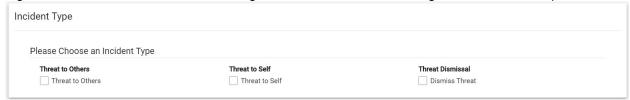


The **Incident Type** decision tree has been updated to better display the three paths out of the SRIF.



APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

(note: Threat Dismissal is being renamed to Not a Threat on the testing site and will still remain configurable to turn on/off)



The proceed to BTA/SRA buttons no longer appear. Now, when an SRIF is finalized, it automatically creates a threat assessment for the items that are selected, or will end the process if Dismiss Threat is selected.

Behavioral Threat Assessment

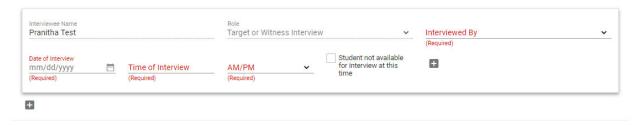
Part 1

Location of Incident will be a checklist and will pull forward from the new checklist in the SRIF



Part 2

The Role header in the Interview Panel is now configurable and can be renamed to something else if desired. – use Interview Type

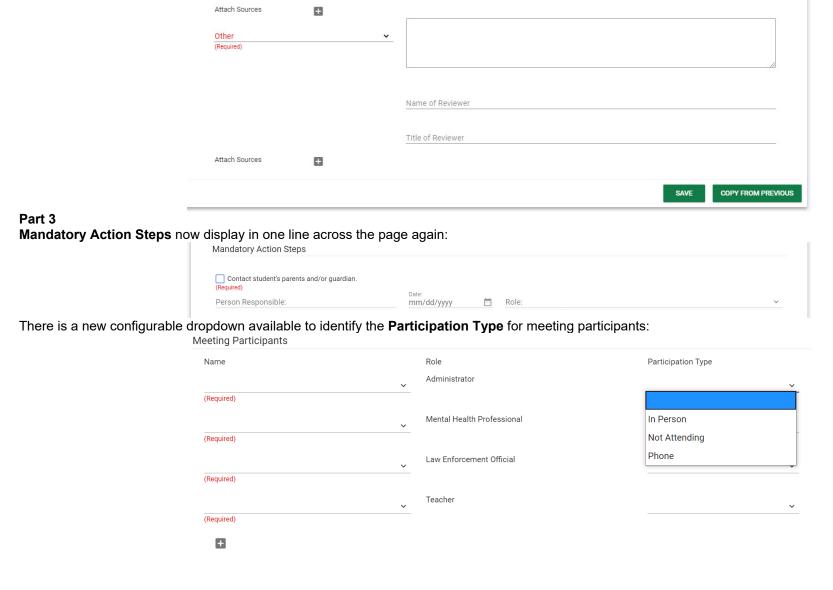




APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

The **Records Review** Section will now offer a "Copy from Previous" button if there has been another Behavioral Threat Assessment completed in the same school year.

Title of Reviewer





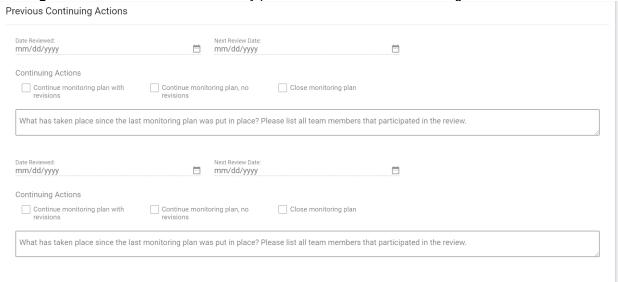
APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

Monitoring Plan

There is a new configurable dropdown available to identify the **Participation Type** for meeting participants:



New Panel for **Previous Continuing Actions** to see the outcome of any previous reviews to the Monitoring Plan.





APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

Suicide Risk Assessment

Part 1

Location of Incident will be a checklist and will pull forward from the new checklist in the SRIF

Location of Incident		
Bus	Hallway	Classroom
✓ Other		
Other:		
(Required)	•	

Baker Act question has been moved off of this page and onto Part 3

Part 2

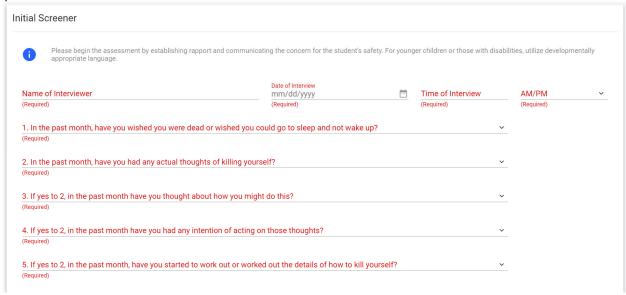
Add **Unknown** as an answer in the dropdown to the clinical review questions



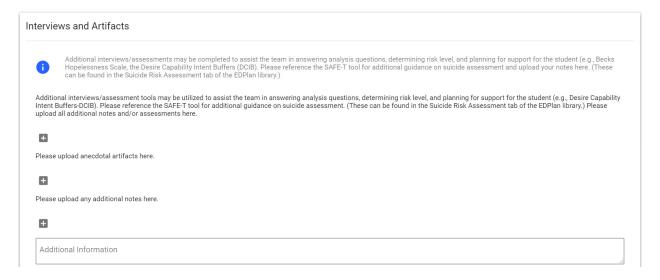


APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

Moved the Initial Screener questions to Part 2



Interviews and Artifacts can now hold an Additional Information text field with configurable label.

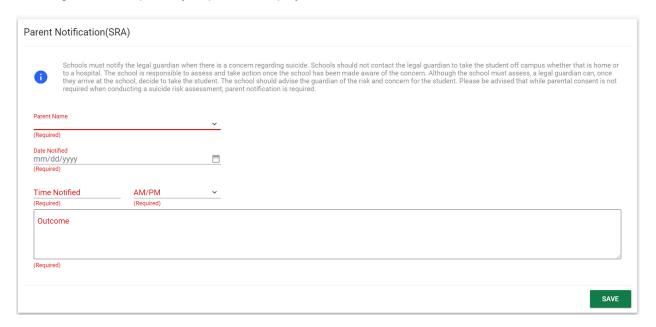




APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

Part 3

Parent Notification can now be configured to be optionally required or displayed/hidden.



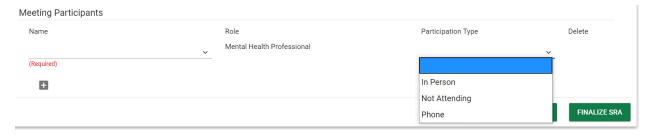
Baker Act question moved from Part 1





APPENDIX V: EDPLAN/BTA MODULAR UPDATE - CONTINUED

There is a new configurable dropdown available to identify the **Participation Type** for meeting participants:



Support Plan

There is a new configurable dropdown available to identify the **Participation Type** for meeting participants:



New Panel for **Previous Continuing Actions** to see the outcome of any previous reviews to the Support Plan.

December 2020 Features

School Profile Form update: Changes made to the school profile form for the Core BTA and Core SRA teams will now automatically update the school's core team pages when a new SPF is finalized for a school.



APPENDIX VI: BTA POLICY MANUAL

2130

THREAT ASSESSMENT POLICY

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 threat assessment policy shall be interpreted and applied consistently with all applicable state and federal laws, and The Board's collective-bargaining agreements. The policy was 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.

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 **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.

An **imminent threat** exists when the person's behavior/situation poses a clear and immediate threat of serious violence toward self or others that requires containment and

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APPENDIX VI: BTA POLICY MANUAL - CONTINUED

action to protect identified or identifiable target(s); and may also exhibit behavior that requires intervention.

D. A **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. Each school principal shall identify a school-based threat assessment team with the mandatory team members and alternate team members before students report to school each year.
- B. All school-based administrators and threat assessment team members must attend and complete mandatory district threat assessment trainings annually
- C. 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.
- D. School-based threat assessment teams shall adhere to the rules and responsibilities within this policy with fidelity.

Section III: ROLES AND RESPONSIBILITIES

- A. The Chief of Safety, Security, and Emergency Preparedness (Chief) shall ensure compliance with this policy.
- B. Each school principal shall identify members of a threat assessment 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 threat assessment 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 team 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. 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, the school principal must 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. The team shall gather information regarding the specifics of the threat and/or behaviors that may pose a threat, including but not limited to: details of the incident or threat, witness statements, and relevant artifacts.



APPENDIX VI: BTA POLICY MANUAL - CONTINUED

- G. 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 pathway to violence.
 - a. For students deemed a threat to self, the threat assessment team must ensure the student's immediate safety, then refer the student to the school-based suicide designee. The suicide designee will meet with the student and assess the severity of the risk following the Suicide Prevention Handbook guidelines.
 - b. If the threat assessment team determines that a student poses a threat to others, the 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.
 - c. 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 consistent with the model policies developed by the Office of Safe Schools.
 - d. 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.
 - e. 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.
- H. Threat assessment teams shall follow established procedures for referrals to school-based, community, and/or health care providers for mental health services, evaluation, or treatment.
- I. All threat assessment outcomes and recommendations must be reported to the school principal. The school principal will review the documentation for all threat assessments to ensure completeness and fidelity. The school principal will sign/acknowledge that the threat assessment documentation is complete and will forward the signed/acknowledged assessment to their supervisor. In addition, upon a preliminary determination that a student poses a threat of violence or physical harm to self or others, the threat assessment team must immediately report its determination to school principal or his/her administrative designee. The principal or his/her administrative designee shall immediately attempt to notify the student's parent or legal guardian.
 - a. Nothing in this policy shall preclude school personnel from acting immediately to address an imminent threat. Where an immediate threat to life or physical safety exists, reports must result in an immediate notification to law enforcement.
 - b. Nothing in this policy shall preclude the threat assessment team from notifying the school principal, his/her administrative designee, or the Chief of any individual (other than a student) who poses a threat of violence or physical harm to self or others.
- J. 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 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. Threat assessment

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APPENDIX VI: BTA POLICY MANUAL - CONTINUED

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).

- K. The threat assessment team shall identify 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.
- L. 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.
- M. Regardless of threat assessment activities, disciplinary action and referral to law enforcement are to occur as required by law and school board policies.
- N. Upon a preliminary determination by the threat assessment team that an individual poses a threat, members of the threat assessment team may request and obtain criminal history record information.
 - a. No member of a threat assessment 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 threat assessment team may **not** maintain the criminal history record or place it in the student's educational file.
- O. 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.
- P. If a student commits more than one misdemeanor, that is known to the school, the threat assessment team must consult with law enforcement to determine if further action is warranted.
- Q. 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, a threat assessment team may use alternatives to expulsion or referral to law enforcement agencies unless the use of such alternatives will pose a threat to school safety.
- R. Threat assessment records are considered education records and shall be maintained and released in accordance with FERPA and state statute. The threat assessment, 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.
- S. The Chief Auditor will conduct annual audits, in compliance with this policy, and report findings to the Audit Committee and The School Board.

AUTHORITY: F.S.§ 1006.07(7); F.S. §1006.13 HISTORY:

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Compliance Audit – Threat Assessment Policy & Procedures Internal Audit Report Issued: August 3, 2021



APPENDIX VII: 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://bcps-mentalhealth.com/threatAssessment.php

The School Board of Broward County, Florida



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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 *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. This 2019 revision of the district's behavioral threat assessment procedures incorporates the most updated recommendations from national leaders in threat assessment, such as the Federal Bureau of Investigation (FBI), the U.S. Secret Service, and 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 2019 Behavioral Threat Assessment (BTA) procedures manual 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)

Threat Assessment Policy (SBBC 2130) (5) was written in accordance with state legislation (6, 7), 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 **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. Aberrant behaviors 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 serious 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. A **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.

Roles and Responsibilities

Some of the key roles and responsibilities school-based threat assessment teams shall adhere to are outlined below:

- Each school principal shall identify a school-based threat assessment team with the mandatory team members and alternate team members before students report to school each year. The mandatory team members must include:
 - o Administrator (Principal, when available)/Administrative Designee
 - Mental Health Professional (School Counselors, School Psychologists, School Social Workers, Family Counselors)
 - o Teacher (with knowledge of the student)
 - o Law Enforcement
 - o Additional personnel with knowledge of the child or circumstances may also serve as members of the team (e.g., Security Specialist, ESE Specialist, Behavior Specialist, etc.)
- All school-based administrators and threat assessment team members must attend and complete mandatory district 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 shall identify members of the school community to whom threatening behavior should be reported.
- ➤ 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, the school principal must 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.
- ➤ The threat assessment, its determination, along with any interventions provided, will be recorded in the appropriate electronic data systems by the threat assessment team.
- ➤ All threat assessment outcomes and recommendations must be reported to the school principal, who will review the documents to ensure completeness and fidelity. The completed threat assessment documentation will also be submitted to the principal's supervisor for review.
- ➤ Upon completion of the BTA, the principal or his/her administrative designee is required to immediately attempt to notify the student of concern's parent/legal guardian.
- > 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 threat assessment team that an individual poses a threat, members of the 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.
- ➤ 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, a threat assessment team may use alternatives to expulsion or referral to law enforcement agencies unless the use of such alternatives will pose a threat to school safety.
- Threat assessment records are considered education records and shall be maintained and released in accordance with The Family Education Rights and Privacy Act (FERPA), state statute, and School Board Policy 5100.2: Transfer, Retention, And Disposal (See Maintenance of Records and Information Sharing). School-based administrators must ensure that FERPA log is completed when appropriate. If further assistance is needed, please contact the Risk Management Privacy Officer 754-321-1914.

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, and 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 (9). For this reason, the procedures outlined in this manual are based on best practice guidelines in the prevention of violence and threat assessment. The University of Virginia's *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). Furthermore, the Virginia Department of Criminal Justice Services (DCJS) has provided model policies and procedures to help local school boards establish and operate threat assessment teams, developed using a synthesis of available research (9, 10). 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 (4).

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 (4). The designated leader shall initiate an initial inquiry/triage upon receiving a threat report (10). The leader may designate a subset of team members for additional data collection (10). Defined roles and responsibilities of team members during this process may include review of threatening behavior/communications, review of records, and conducting interviews (10). Determination of the seriousness of a threat shall be made expeditiously and in consultation with threat assessment team members (10). 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 (10).

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, 10) 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.

Distinguishing among 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. These typically include warning behaviors such as planning and preparation, recruitment of accomplices, and acquisition of a weapon (3).

Once a threat report has been received, BTA procedures should incorporate the following steps (1, 3, 4, 10):

- > Threat assessments should begin with collecting information from a variety of sources. This can include 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 with mental health screenings, 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, and monitoring.

Considerations for Determination of Risk Level

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, 4). 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 *low*, *medium*, or *high* level of risk (See <u>APPENDIX H</u>) 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).

Expect 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, behavioral changes may occur, such as: deception, hiding behaviors, acceleration of their plan, or increased feelings of persecution. Sometimes management involves 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 (10). 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 (10). 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 (4). 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 (4). 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 (§):

- ➤ 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 is 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 Broward School's BTA Process and Procedures

Broward School's BTA process involves: 1) gathering information about the incident, 2) data collection, 3) analysis, determination of risk level, and creating a support plan. Overall, the corresponding school's BTA team will utilize 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. *EdPlan serves as the BCPS electronic database for BTA records. When a threat report is received, BTA teams must follow procedures and complete all components below on the BTA tab on EdPlan (See APPENDIX A)*.

	STUDENT RISK INTAKE FORM
	Complete Student Risk Intake Form to assess the student's risk to self and/or others.
	o If the individual poses a threat of harm to others, follow BTA procedures below.
	o If a threat to self is identified, also follow the Suicide Risk Assessment (SRA) process.
	 Take immediate actions for imminent threats.
	BTA PART 1: INCIDENT INFORMATION
	Prior to completing BTA Part 1 on EdPlan, all team members must be added to the student of
	concern's team on the EdPlan Team and Family/Others tab (See <u>APPENDIX A</u>).
	Incident Information : Specific details about the incident, threat, and/or concern.
_	BTA PART 2: DATA COLLECTION
	Interviews and Sources: Names of persons interviewed and interview details.
	Records Review: Review relevant records and specify person who reviewed the information.
	Attached Sources: Attach/store all relevant artifacts pertaining to the student's BTA.
	Interview Documents: Lists interview forms completed for BTA.
	DEL DADE A ANALY MOTO DIGITAL DIVIDIA AND CHILDREN CUIDDODE DE ANA
_	BTA PART 3: ANALYSIS, RISK LEVEL, AND STUDENT SUPPORT PLAN
	Analysis: Answer 10 key questions to analyze <u>risk factors</u> , warning behaviors, and <u>mitigating</u>
	Analysis: Answer 10 key questions to analyze <u>risk factors</u> , <u>warning behaviors</u> , and <u>mitigating</u> <u>circumstances</u> (consider all information collected in <u>Part 1</u> and <u>Part 2</u>).
<u> </u>	Analysis: Answer 10 key questions to analyze <u>risk factors</u> , <u>warning behaviors</u> , and <u>mitigating circumstances</u> (consider all information collected in <u>Part 1</u> and <u>Part 2</u>). Determination of Risk Level: Determine risk level based on all information collected
	Analysis: Answer 10 key questions to analyze <u>risk factors</u> , <u>warning behaviors</u> , and <u>mitigating circumstances</u> (consider all information collected in <u>Part 1</u> and <u>Part 2</u>). Determination of Risk Level: Determine risk level based on all information collected O <u>Unfounded</u> : Following a threat assessment, the threat could not be corroborated or
	Analysis: Answer 10 key questions to analyze <u>risk factors</u> , <u>warning behaviors</u> , and <u>mitigating circumstances</u> (consider all information collected in <u>Part 1</u> and <u>Part 2</u>). Determination of Risk Level: Determine risk level based on all information collected or <u>Unfounded</u> : Following a threat assessment, the threat could not be corroborated or substantiated.
	 Analysis: Answer 10 key questions to analyze risk factors, warning behaviors, and mitigating circumstances (consider all information collected in Part 1 and Part 2). Determination of Risk Level: Determine risk level based on all information collected Unfounded: Following a threat assessment, the threat could not be corroborated or substantiated. Low: Person/situation does not appear to pose a threat of violence and any underlying
	 Analysis: Answer 10 key questions to analyze risk factors, warning behaviors, and mitigating circumstances (consider all information collected in Part 1 and Part 2). Determination of Risk Level: Determine risk level based on all information collected Unfounded: Following a threat assessment, the threat could not be corroborated or substantiated. Low: Person/situation does not appear to pose a threat of violence and any underlying issues can be resolved easily.
	 Analysis: Answer 10 key questions to analyze <i>risk factors, warning behaviors</i>, and <i>mitigating circumstances</i> (consider all information collected in Part 1 and Part 2). Determination of Risk Level: Determine risk level based on all information collected Unfounded: Following a threat assessment, the threat could not be corroborated or substantiated. Low: Person/situation does not appear to pose a threat of violence and any underlying issues can be resolved easily. Medium: Person/situation does not appear to pose a threat of violence at this time but
	 Analysis: Answer 10 key questions to analyze risk factors, warning behaviors, and mitigating circumstances (consider all information collected in Part 1 and Part 2). Determination of Risk Level: Determine risk level based on all information collected Unfounded: Following a threat assessment, the threat could not be corroborated or substantiated. Low: Person/situation does not appear to pose a threat of violence and any underlying issues can be resolved easily. Medium: Person/situation does not appear to pose a threat of violence at this time but exhibits behaviors that indicate a continuing intent to harm and/or potential for future
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	 Analysis: Answer 10 key questions to analyze <i>risk factors, warning behaviors</i>, and <i>mitigating circumstances</i> (consider all information collected in Part 1 and Part 2). Determination of Risk Level: Determine risk level based on all information collected Unfounded: Following a threat assessment, the threat could not be corroborated or substantiated. Low: Person/situation does not appear to pose a threat of violence and any underlying issues can be resolved easily. Medium: Person/situation does not appear to pose a threat of violence at this time but exhibits behaviors that indicate a continuing intent to harm and/or potential for future violence. High: Person/situation appears to pose a threat of violence, exhibiting behaviors that
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	 Analysis: Answer 10 key questions to analyze <i>risk factors, warning behaviors</i>, and <i>mitigating circumstances</i> (consider all information collected in Part 1 and Part 2). Determination of Risk Level: Determine risk level based on all information collected Unfounded: Following a threat assessment, the threat could not be corroborated or substantiated. Low: Person/situation does not appear to pose a threat of violence and any underlying issues can be resolved easily. Medium: Person/situation does not appear to pose a threat of violence at this time but exhibits behaviors that indicate a continuing intent to harm and/or potential for future violence. High: Person/situation appears to pose a threat of violence, exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the

Student Risk Intake Form

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

	Formation About the Incident
	Incident Type
	Today's Date
	Who reported this initial concern?
	o Reporter Name
	 Affiliation to School
_	o Contact Number
Ц	Who was this concern reported to?
	 Name of Individual
	 Affiliation to School
_	o Contact Number
	Date Reported
	Time Reported (if known)
	Date Administrator Learned of Incident
	DMS Incident Number (if applicable)
	Date of Incident
	Time of Incident
	Location of Incident
ч	Time of Incident
bel abe	rrative Details: Write a narrative below detailing the incident, threat to self, threat to others, and/or neerning behavior reported. Please include the location and time of the incident, threat, or concerning navior. Determine if there are other individuals who witnessed the student engaging in threatening, errant, or concerning behavior. Where threats were communicated, quote where possible, and use otation marks to indicate direct quote. Attach original documentation, if available, later in the BTA and/or A processes.
Pri	imary Target(s): If a threat to others has been made, has the intended target been identified?
	itness(es): If additional witnesses were identified by the reporter, please list them. Name of Witness Affiliation Contact Number

l L	ntak	xe Outcome(s) (Check all that apply):
] If	the individual is suspected of posing a threat of harm to others, then mobilize the threat assessment
	te	am and conduct BTA within 24 hours, starting with BTA Part 1: Incident Information.
		If imminent threat to others is suspected, then contact law enforcement immediately. Documen
		the name of the law enforcement official contacted, date/time of contact, and outcome of contact.
		The following actions are also mandatory:
		 Utilize law enforcement to contain the threat and consult with the school safety team.
		o Take immediate precautions to protect potential victim(s).
		o Initiate school safety plan procedures (e.g., Code Yellow, Code Red), if warranted.
		o Consult with SRO, as appropriate, to assist in monitoring/supervising the student of concern and
		determining the need for law enforcement action.
		o 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.
		o If the student is on campus and significant mental health concerns are noted, consult with a mental health 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.
		afe, maintain adult supervision, and contact a Suicide Designee or other mental health professional to onduct Suicide Risk Assessment (SRA) immediately (2). If imminent threat to self 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. If a Baker Act Assessment was initiated, document the name of the Baker Act Assessment Initiator, the date/time initiated, and the outcome of the Baker Act Assessment if known (e.g., Was the student transported to the hospital? Was the student hospitalized?).
		The following actions are also mandatory:
		 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 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.
	c I	f 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 f you require assistance, please contact the Psychological Services Department (754) 321-3440 and/or SEDNET Department (754) 321-3421.

BTA Part 1: Incident Information

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 completed within **24 hours** of receiving the report.

BTA PART 1: INCIDENT INFORMATION

U	Prior to completing BTA Part 1 on EdPlan, all team members must be added to the student of
	concern's team on the EdPlan Team and Family/Others tab (See APPENDIX A).
	• • • • • • • • • • • • • • • • • • • •
	Proceed with documenting any additional details of the incident report in each of the sections below within
	EdPlan BTA Part 1:
	☐ Information about the Incident
	□ Sources
	□ Details
ш	If the individual is suspected of posing a threat of harm to others, mobilize the threat assessment team
	and conduct BTA within 24 hours, proceeding with BTA Part 2 and Part 3.
	☐ If imminent threat to others 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:
 - Utilize law enforcement to contain the threat and consult with the school safety team.
 - Take immediate precautions to protect potential victim(s).
 - o Initiate school safety plan procedures (e.g., Code Yellow, Code Red), if warranted.
 - o Consult with SRO, as appropriate, to assist in monitoring/supervising the student of concern and determining the need for law enforcement action.
 - o 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.
 - o If the student is on campus and significant mental health concerns are noted, consult with a mental health professional and employ Baker Act procedures, if warranted.
 - o Complete and submit BCPS SIU Immediate Notification Form.
 - o Mobilize full threat assessment team.
 - o Follow discipline policy, as indicated.

Regardless of law enforcement action, the threat assessment team must gather relevant information and complete BTA Parts 2 and 3 within 24 hours of the administrator receiving the initial report. If school is not in session, the school principal must 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 (5).

BTA Part 2: Data Collection

The school-based administrator must assemble the mandatory 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 (5).

*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.

RTA PART 2: DATA COLLECTION

	Assemble BTA team and assign data collection <u>roles and responsibilities</u> to each team member (e.g., Who will conduct interviews? Who will review records? Who will collect artifacts?). Proceed with BTA procedures on EdPlan <u>BTA Part 2.</u>		
Int	Interviews and Sources		
	Please indicate names of individual(s) interviewed throughout the BTA process, name of the interviewer(s), and date of interview(s).		
Int	Interview Documents		
	Interviews are to be entered into EdPlan. If printed forms are utilized (APPENDIX B through F), 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 section lists BTA interview forms completed:		
	☐ <u>Initial Student Interview</u> (Required)		
	 Must be completed by a school-based administrator Also recommended that a mental health professional be present during this interview 		

☐ 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.

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

the student must be considered, and the language of the questions adjusted accordingly.

- ☐ <u>Clinical Parent Interview</u> (Required for *Medium/High* Risk Levels at <u>Part 3 Determination of Risk Level</u> <u>Phase</u>)
 - Must be completed by mental health professional with a parent/guardian. An additional school staff member may participate, if warranted.
 - o Also recommended if more information is necessary at Part 3 Analysis Phase

The interviewer must begin by attempting to establish rapport and engage the parent as an ally. Use the interview questions as a guide to interview the parent/guardian of a student who either made a threat or exhibited a behavior of concern. Try to use open-ended questions rather than leading questions and ask follow-up questions, as appropriate.

- ☐ <u>Clinical Student Interview</u> (Required for *Medium/High* Risk Levels at <u>Part 3 Determination of Risk Level</u> <u>Phase</u>)
 - Must be completed by mental health professional. An additional school staff member may participate, if warranted.
 - o Also recommended if more information is necessary at Part 3 Analysis Phase

The purpose of this 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 the interview questions as a guide to interview the student who either made a threat or exhibited a behavior of concern. Open-ended questions, rather than leading questions, should be used. The developmental level of the student must be considered, and the language of the questions adjusted accordingly. Follow-up questions should be asked, as appropriate.

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.

☐ Required:

- o Behavioral/Discipline History
- o ESE, 504, and/or Gifted History
- Academic/Attendance History

- ☐ Other, if applicable (i.e., records indicative of <u>risk factors</u>, warning <u>behaviors</u>, or <u>mitigating factors</u>):
 - o Classwork/Homework Assignments
 - o Journal/Artwork
 - o Social Media
 - Other Relevant Sources of Information (i.e., original written communication of threats, witness statements referenced in <u>Part 1</u>, photos, documents, etc.)
- ☐ Following a records review, the team must answer the following question:
 - o Has the student previously exhibited behaviors of concern or posed a threat?

BTA Part 3: Analysis, Risk Level, And Student Support Plan

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 pathway to violence. 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

do	es not pose a threat to self or others ($\underline{5}$).
	Assemble all mandatory BTA team members to collaboratively analyze available data, determine level of risk, and develop appropriate interventions. Proceed with BTA procedures on EdPlan BTA Part 3.
вт	TA PART 3: ANALYSIS, RISK LEVEL, AND STUDENT SUPPORT PLAN
An	nalysis
	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.
	Answer 10 key questions to analyze potential <u>risk factors</u> , <u>warning behaviors</u> and <u>mitigating circumstances</u> . Consider all information collected in <u>Part 1</u> and <u>Part 2</u> .
	1. What is the student's motive(s) and/or goal(s)?

- - > Consider any previously identified grievances or concerns.
- 2. Have there been communications suggesting ideas, intent, planning, or preparation for violence? Does the threat of violence appear to be transient (i.e., easily resolved and/or no real intent to harm others) or substantive (i.e., a serious intent to harm others)? Is there physical evidence (if yes, describe)?
- 3. Has the student shown any inappropriate interest in, fascination, and/or identification with other incidents of mass or targeted violence?
 - Consider the student's social media posts, writing/blogs, or internet searches, types of films, tv shows, and video games the student is interested in, etc.
- 4. Does the student have (or are they developing) the capacity to carry out an act of targeted violence?
 - > Consider student's access to weapons/means to carry out the attack. How organized is his/her thinking/behavior/planning? If he/she practicing or rehearsing for the violence? Consider the intensity of effort expended in attempting to develop the capability?
- 5. Is the student experiencing hopelessness, desperation, and/or despair? Is there a history of suicidal ideation? Does he/she perceive him/herself as a victim?
 - Consider if the student has experienced recent stressors (e.g., failure, loss, and/or loss of status) and is having difficulty coping.

- 6. Does the student have a positive, trusting, or sustained relationship with at least one responsible person?
 - ➤ Consider individuals at school, home, or in the community that can provide support, guidance, or assistance. Consider if the student is emotionally connected to other people or becoming more socially isolated.
- 7. Does the student see violence as an acceptable, desirable, or the only way to solve a problem? Does the peer group condone violence? Is there a history of aggression/violence/bullying?
 - ➤ Consider whether the setting around the student (e.g., friends, family members, coworkers, etc.) explicitly or implicitly support or endorse violence as a way of resolving problems or disputes. Consider whether the student appears to be expressing sentiments of finality or desperation to address his/her grievance(s).
- 8. Are the student's conversation and 'story' consistent with his/her actions?
 - ➤ Consider whether the information from interviews and from the student's own behavior confirms or disputes what the student reports.
- 9. Are other people concerned about the student's potential for violence?
 - ➤ Consider individuals in the school, family, and/or community that have expressed concerns about the student's behavior or potential for violence.
- 10. What circumstances might affect the likelihood of an escalation to violent behavior?
 - ➤ Consider any factors that might exacerbate the current situation. Consider threat assessment team interventions that may escalate, deescalate, or have no effect on movement towards violence (e.g., disciplinary actions).

Determination of Risk Level

- ☐ The BTA team must consider the answers to the 10 key questions and all data collected to determine the level of risk the individual of concern poses for targeted violence toward others (Please refer to <u>APPENDIX H</u> for expanded definitions of risk levels):
 - o *Unfounded*: Following a threat assessment, the threat could not be corroborated or substantiated.
 - o Low: Person/situation does not appear to pose a threat of violence and any underlying issues can be resolved easily.
 - *Medium: Person/situation does not appear to pose a threat of violence at this time but exhibits behaviors that indicate a continuing intent to harm and/or potential for future violence.
 - *High: Person/situation appears to pose a threat of violence, exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the plan.
 - *For *Medium/High* level risk, Clinical Parent and Clinical Student Interviews (<u>Interview Documents</u>) must be conducted to assist with developing the Student Support Plan (SSP).

Parent notification is required at this phase if not already contacted for imminent threat (Part 1) or clinical interviews completed for Analysis. Please contact the parent and document the date, time, and name of the parent, and the outcome of the notification. Please be advised that while parental consent is not required when conducting a threat assessment, parent notification is required.

Student Support Plan (SSP)

In addition to the mandatory action steps, the team will identify responses that can help support the student of concern 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. It is recommended that the original threat assessment team members help develop the SSP 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.

• Once the level of risk has been determined, the BTA team will follow the mandatory actions that correspond to the level of risk identified. Identify which individual is responsible for each mandatory action.

Mandatory Actions:

- Unfounded
- Contact student's parents and/or guardian.
- Additional responses, as determined by the threat assessment team.
- Low
- Contact student's parents and/or guardian.
- See that threat is resolved through explanation, apology, or making amends.
- Follow discipline procedures as per policy 5.8.
- Additional responses, as determined by the threat assessment team.
- Medium
- Contact student's parents and/or guardian.
- See that threat is resolved through explanation, apology, or making amends.
- Caution the student about the consequences of carrying out the threat.
- Notify intended victim(s)'s parents and/or guardians.
- Conduct Clinical Parent Interview.
- Conduct Clinical Student Interview.
- Consult with SRO to assist in monitoring/supervising the student and determining need for law enforcement action.
 - o Document the name of the law enforcement official contacted, date/time of contact, and outcome of contact.
- Refer to CPS Team to determine need for academic/behavioral intervention and/or the need for psychological evaluation.
- Develop safety plan.
- Assign a team member to monitor student and status of intervention(s).
- Follow discipline procedures as per policy 5.8.
- Additional responses, as determined by the threat assessment team.

High

- Contact student's parents and/or guardian.
- Provide direct supervision of subject student until guardian(s) assume control.
- See that threat is resolved through explanation, apology, or making amends.
- Caution the student about the consequences of carrying out the threat.
- Notify intended victim(s)'s parents and/or guardians.
- Conduct Clinical Parent Interview.
- Conduct Clinical Student Interview.
- 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.
 - o Document the name of the law enforcement official contacted, date/time of contact, and outcome of contact.
- Assign a team member to monitor student and status of intervention(s).
- Follow discipline procedures as per policy 5.8.
- If the threat assessment records were shared with Law Enforcement, please complete the FERPA log and contact the Privacy Officer if clarification is needed.
- Additional responses, determined by the threat as assessment team.

Add	itional Actions
	In addition to the mandatory action steps, the team will identify additional actions that can help support the student and make positive outcomes more likely. The mandatory and additional actions selected here will comprise the SSP.
	Review all actions (mandatory and additional) with individuals who did not participate in the threat assessment who work with the student.
Mee	ting 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. <i>Reminder:</i> 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 members of the team (5).
Fina	alize BTA & Student Support Plan
	Select COMPLETE THREAT ASSESSMENT once the BTA team has completed Parts 1 through 3 of the BTA process. Please note: Finalizing this document will send alerts to the predetermined individuals for notification

(e.g., Cadre Director, School Principal, etc.)

	Print the final page of the BTA 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 Behavioral Threat Assessment document that it applies to. Please refer to APPENDIX A for detailed instructions. Along with the electronic record in EdPlan, completed threat assessments must be documented in TERMS by a member of the BTA team. BTA Team Member will enter the TERMS L-Panel code that corresponds with the determined risk level: 220- Schl Safety Unfounded 221- Schl Safety Low 222- Schl Safety High
Mon	itoring Plan
	Once the BTA and SSP have been finalized, the team is required to create a Monitoring Plan for Medium and/or High risk levels. For Low risk levels, the team may create a corresponding Monitoring Plan if warranted.
	Through the Monitoring Plan, the team identifies any actions that require continued implementation and monitoring. This includes disciplinary actions and 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 will be listed in the student's BTA dashboard.
	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 (e.g., Cadre Director, School Principal, etc.)
	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. Please refer to <u>APPENDIX A</u> for detailed instructions.
	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 and upload documentation (e.g., logs, data) for all actions selected on the Monitoring Plan.

Maintenance of Records and Information Sharing

- ➤ Threat assessment records are considered education records and shall be maintained and released in accordance with FERPA, state statute, and School Board Policy 5100.2: Transfer, Retention, And Disposal.
- ➤ Parents have the right to inspect records if requested. If records are shared or released, the names and identifying information of individuals other than the student of concern must be redacted.
- ➤ SBBC will provide education records to other agencies when provided with signed written consent from the student's parent/guardian or student age 18 or older designating the education records that may be released.
- ➤ Pursuant to FERPA regulations and applicable state statutes, SBBC will provide education records in the following circumstances without obtaining written consent from the student's parent/guardian or student age 18 or older. School-based administrators must ensure that FERPA log is completed when appropriate. If further assistance is needed, please contact the Risk Management Privacy Officer 754-321-1914.
 - SBBC shall provide any and all educational records of individual students in a health or safety emergency, if the information is necessary to protect the health and safety of students or other individuals. When school officials determine that there is an articulable health or safety emergency, school officials will may disclose **only** information from education records to any person whose knowledge of the information is necessary to protect the health and safety of students and other individuals.
 - Threat assessment teams shall contact other agencies involved with the student and any known service providers to share information and coordinate necessary follow up.
 - Pursuant to SB 7030, 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.
 - O Upon request on the day of the BTA meeting, SBBC shall provide to School Resource Officers (SRO) or other Law Enforcement officers (LEO) any and all education records discussed and used during a threat assessment meeting to determine the level of threat and/or interventions to be provided to the student.
 - 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.
 - All state and local agencies and programs (e.g., DOE, DJJ, DOH, etc.) may share with each other records or information that are confidential if the records are reasonably necessary to ensure access to appropriate services for the students and to ensure safety of the student and others.

REFERENCES

- Behavioral Threat Assessment Center. (n.d.). Making Prevention a Reality: Identifying,
 Assessing, and Managing the Threat of Targeted Attacks [PDF file]. Retrieved from
 https://www.fbi.gov/file-repository/making-prevention-a-reality.pdf/view
- Broward County Public Schools. (2019). Suicide Prevention and Baker Act Handbook [PDF file]. Retrieved from
 https://www.browardschools.com/cms/lib/FL01803656/Centricity/Domain/13477/Suicide_Handbook_2-2019.pdf
- Cornell, D. (2019). Overview of the Comprehensive School Threat Assessment Guidelines [PDF file].
 Retrieved from
 https://curry.virginia.edu/sites/default/files/images/YVP/Comprehensive%20School%20Threat%20Assessm
 - ent%20Guidelines%20overview%20paper%205-10-19.pdf
- 4. National Threat Assessment Center. (2018). Enhancing School Safety Using a Threat

 Assessment Model: An Operational Guide for Preventing Targeted School Violence [PDF file]. Retrieved from https://www.dhs.gov/sites/default/files/publications/18_0711_USSS_NTAC-Enhancing-School-Safety-Guide.pdf
- 5. School Board of Broward County. (2019). *Threat Assessment Policy* [PDF file]. Retrieved from http://www.broward.k12.fl.us/sbbcpolicies/docs/Threat%20Assessment%20Policy.pdf
- 6. The Florida Senate. (2018). Senate Bill 7026 [PDF file]. Retrieved from https://www.flsenate.gov/Session/Bill/2018/7026/BillText/er/PDF
- 7. The Florida Senate. (2019). Senate Bill 7030 [PDF file]. Retrieved from https://www.flsenate.gov/Session/Bill/2019/7030/BillText/er/PDF
- 8. United Spinal Association (2015). Disability Etiquette: Tips on Interacting with People with Disabilities [PDF file]. Retrieved from https://www.unitedspinal.org/pdf/DisabilityEtiquette.pdf

- 9. Virginia Department of Criminal Justice Services. (n.d.). *K-12 Threat Assessment in Virginia: A Prevention Overview for School Staff, Parents, and Community Members* [PDF file]. Retrieved from https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/k12-threat-assessment-prevention-overview.pdf
- 10. Virginia Department of Criminal Justice Services. (2016). *Threat Assessment in Virginia Public Schools:*Model Policies, Procedures, and Guidelines [PDF file]. Retrieved from

 https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf

APPENDIX A: EdPlan Guide



Behavioral Threat Assessment (BTA) Quick Reference Guide

Be on the lookout for:

- If a field is a required, a red '(Required)' icon will appear below that field. You will not be able to finalize the assessment without completing required fields.
- Enter data into all required fields on the page, working from top-to-bottom, left-to-right. The field types you will see include drop-downs, text fields, checkboxes, radio buttons, and date selectors. Text fields with scroll-bars to the right indicate that there is more text above or below the text that can be seen at that moment.
- Additional fields can appear depending on the answers given; for example, if you answer 'Yes' to a question, additional fields may appear to elaborate on that answer.
- Save your progress when you can. There are many 'Save' buttons within each page of the process for your convenience, but you do NOT have to click each one. Clicking any 'Save' button on the page will save ALL fields on that page.
- Clicking on the Green Right Arrow button at the top of a page will save all data and check for any errors on that page. If there are no errors, then you will be taken to the next page in the process until you reach the final page.
- Clicking on the Orange Left Arrow will NOT save data and will take you back to the previous page in the process.
- Clicking the Blue Arrow on the right-hand side of the page will open a menu that allows you to navigate to other pages. Clicking on another page in this menu will navigate to the other page even if there are errors on the current page, but it will NOT save data on the current page.

EDPlan Main Menu

When you first log in you will be taken to the EDPlan Main Menu page.

- The Behavioral Threat Assessment widget provides a quick, visual display of the number and status of threat assessments for your students.
- The Resource Information panel at the bottom of the page contains reference documents available for you to download. Behavioral Threat Assessment related resources are located under the BTA tab.
- On the Main Menu page, hover the cursor over the 'Student' drop-down menu and select 'Student Search'.
- Search for the student who is the subject of the BTA and click on the student's name in the resulting 'Select a Student' table.

Student Risk Intake Form

- Once in the student profile, hover over 'Behavioral Threat Assessment' in the blue menu bar and select 'Student Risk Intake Form' from the drop-down. The Student Risk Intake Form page will display.
- In the first panel, titled 'Information about the Incident', fill in the fields with data about the incident. You may select multiple checkboxes under Affiliations to School, and you can enter 'N/A' if a contact number is not available.
- If your answer is 'Yes' to 'Has the intended target been identified?', then checkboxes and a text field will appear to specify the Primary Target(s). You may list multiple target names in the text field by separating them with a comma.

- You have the option to include witness names, affiliations, and contact numbers in case additional witnesses were identified by the reporter.
- The final part requires you to select the intake outcome. Based on the available evidence at this time, does the incident involve a threat to others, a threat to self, or both?
- Next you will see buttons to save, create a draft, and/or finalize the document at the bottom of the panel. After finalizing the document, a panel will appear titled 'Proceed to BTA and/or SRA' with a note directing you to the BTA process and/or SRA process depending on your selection(s) under 'Intake Outcome'.
- In the final panel, titled 'View Previous Documents' you can view draft or finalized documents created on this page as well as previous BTA documents for this student. Click on the document name to open and view the document.

Behavioral Threat Assessment

Part I

- After finalizing the Student Risk Intake Form, if the option 'Threat to others' was selected, you should click on the Behavioral Threat Assessment drop-down from the blue menu bar and select Behavioral Threat Assessment.
- Click on the blue 'Create New Threat Assessment' button and you will be taken to 'Part 1: Information About the Incident'.
- Enter information about the incident in the first panel, like the incident information you entered in the Student Risk Intake Form.
- The next panel titled 'Sources' addresses the source of the report. The 'Source of Initial Report' text field is required and is used to enter the name of the person who reported the incident. If the reporter is anonymous, then you can type 'Anonymous' in that field and select 'Anonymous' in the Affiliation to School checkbox area below.
- Document the details of the incident in the narrative text field according to the instructions on the page.
- ❖ Under the 'Details' panel, first enter a narrative about the context of the behavior.
- If your answer is 'Yes' to 'Has the intended target been identified?', then checkboxes and a text field will appear to specify the Primary Target(s). You may list multiple target names in the text field by separating them with a comma.
- If your answer is 'Yes' to 'Was law enforcement required to be contacted?', then required fields will appear to enter the date and time that law enforcement was notified. A bulleted list of instructions for cases of imminent threats to others will also appear.
- Instructions establishing a timeline that applies to all behavioral threat assessments can be seen at the bottom of the panel.
- When you have filled in all fields on the page, click the Green Right Arrow at the top of the page to check for errors and move on to Part II. If any error messages appear, you must enter the required information to correct those errors before you are able to use the Green Right Arrow to move to Part II. Remember that you can always navigate to other parts of the process regardless of errors on the current page by using the menu accessed by clicking the Blue Arrow on the right-hand side of the page.
- A 'View Previous Documents' panel appears at the bottom displaying previous documents.

Part II

This section covers interviews and records and serves as a digital repository for behavioral threat assessment related artifacts.

- In the top panel, the first interview row prepopulates with the subject student name and role. The interviewer and date information must be entered. You can add additional interview rows by clicking the '+' button in the lower left of the panel. Interview documents can be attached to each row by clicking the '+' icon to the right and then clicking the upload arrow icon to choose a file. After choosing a file, click the 'Upload File(s)' button to attach it.
- Interviews that have been finalized in EDPlan will display in the 'Interview Documents' panel with checkboxes to associate the interview with the current behavioral threat assessment. You can view the document by clicking on the document name.

- The next panel is a review of records for the student. It also serves as a repository for any artifacts relevant to the student subject and incident. The first three items, along with their associated fields, are required. You can attach relevant files to any of the items by clicking the '+' button next to 'Attach Sources'.
- The last requirement is to answer whether the student has previously posed a threat. If your answer is 'Yes', then you must select the target(s) of the threat as well as write a narrative describing the previous incident(s).
- Click the Green Right Arrow at the top of the page to check for errors and move on to Part III.

Part III

In Part III, the team will analyze, determine a risk level, and document action steps.

- There are 10 areas for the team to answer questions during their analysis. Please enter all available and relevant information.
- ❖ In the 'Risk' section, select the radio button under 'Determination of Risk Level' corresponding to the level determined by the team based on the available evidence.
- Enter a narrative describing parent contact in the 'Parent Notification' section following the instructions on the page. While parental consent is not required when conducting a threat assessment, parent notification is required.
- Under 'Identify Responses', one or more responses can be selected and relevant information about that response can be entered in the corresponding fields.
- Under 'Actions', the date, time, and contact name can be entered if law enforcement was notified. Also, the date and time of notification of the District Risk Management team can be entered, along with the DMS incident number if applicable.
- A list of 'Action Steps' will appear with various actions depending on the risk level selected above.
- Required 'Meeting Participant' names are entered below, and additional meeting participants can be entered by clicking the '+' button.
- When all required fields have been entered on all pages, you can finalize the threat assessment by clicking the 'Complete Threat Assessment' button. NOTE: It can take around 10 seconds for the finalization process to complete, at which point you will be automatically returned to the BTA main page for the student.

Monitoring Plan

If the team determines that the student requires an ongoing Monitoring Plan, you can create one by clicking the 'Open' button under the Monitoring Plan column on the BTA dashboard for the student.

- Enter the Begin Date of the Monitoring Plan.
- Enter any Discipline information that is relevant.
- Select any Further Actions with the student making the threat and any potential victims, as well as date and narrative information where applicable.
- Required 'Meeting Participant' names are entered below, and additional meeting participants can be entered by clicking the '+' button.
- Enter the Meeting Date and the Review Date. This cannot be more than 30 days in the future as a Monitoring Plan must be reviewed every 30 days.
- When all required fields have been completed, you can finalize the plan by clicking the 'Finalize Monitoring Plan' button. A button will appear for designated users to acknowledge the monitoring plan.
- Note: Designated users can determine the plan is not necessary and select 'Plan Not Needed' to delete the plan.

Monitoring Plan Reviews:

When it is time to review a Monitoring Plan for a student, navigate to the BTA dashboard for the student by clicking 'Behavioral Threat Assessment' in the blue student menu bar.

- At the bottom of the page for that plan under 'Continuing Actions' you have the option to continue the plan with revisions, continue with no revisions, or close the monitoring plan. You must enter the date reviewed, and if you choose to continue the plan, you must enter the next review date before clicking 'Update Monitoring Plan'.
- If the plan is being continued, all actions and data from the previous monitoring plan will be pulled into the new version. These fields will be editable if you chose to continue the plan with revisions. In either case, designated users can then acknowledge the monitoring plan with the new review date in place.

Interviews Tabs

Designated users will have the ability to create interview documents with the option of saving a draft before finalizing each interview. Interview pages can be accessed by hovering over 'Behavioral Threat Assessment' in the blue menu bar and clicking on the desired interview in the drop-down.

- Interviews:
 - Initial Student Interview
 - Clinical Student Interview
 - Clinical Parent Interview
 - Teacher Input Form
- You must complete all required fields at the top of the page and answer all questions before finalizing an interview document. Once an interview document is finalized, it cannot be edited.
- Previous interview documents can be viewed in the documents panel at the bottom of each interview page.

Adding or Editing Parent/SRO/Non-EDPlan User Information

- Adding parents or other non-EDPlan users (like SRO's) can be done within a student's record.
- Hover over the 'EDPlan Team' drop-down menu in the student's blue menu bar and click on 'Family/Others'.
- To add a new person to the team, click the 'Add New Parent/Guardian' button.
- You must enter information into the required Full Name and Relationship fields. Ex. Relationship may be 'Law Enforcement Official'
- Click 'Update the Database' to save. Details can be edited from the Parents/Guardians page or by clicking the 'Details' button for that person on that page. Be sure to click 'Update the Database' to save any changes.

Adding Contacts

- You have the ability to add contacts (communications) within a student's profile; use this to document conversations or notifications to various parties as needed.
- ❖ Hover over the "EDPlan Team" dropdown menu and select "Contacts".
- A new page will open and allow you to create a new parent contact or non-parent contact.
- Selecting either choice will open a new page of blank fields to enter the contact's name and other relevant information about the encounter.
- Contacts will be stored in the system indefinitely, and a document can be created listing all contact encounters by clicking the 'Print Contact Logs' or 'Export Contact Logs' buttons on this page.

Uploading External Attachments

Once in the student's profile, click on the tab in the blue menu labeled "Documents"

- To upload an external attachment (e.g. a signature page), select the "Upload External Attachments" button at the BOTTOM of the page. DO NOT select "Upload External Documents", as this is used to add an entirely new document to the student's record.
- A new page opens and you will see a list of documents; select the document you want to attach a signature page to, click 'Choose File' to select a file from your computer, then click the 'Upload File' button.
- ❖ You will now see a link for the attached file next to the document you selected on the "Documents" tab, as well as the date it was attached.

Support Troubleshooting

- If you are experiencing any issues with the system and its functionality in general, please select the "Send us a Message Link".
- This is located at the upper right-hand corner of the page next to "Log Out".
- Once you click the link, a pop out window will appear on the bottom right corner of the screen with your name and email pre-populated.
- Select a 'Question Type' from the dropdown menu (please select the specific part/page of EDPlan that is not functioning), the student if applicable, a subject line to summarize the issue, and a larger narrative box for issue description. Note: Deletion Requests, Threat Assessment Related, and adding an attachment are optional.
- NOTE: PLEASE DO NOT INCLUDE STUDENT INFORMATION IN THE "SUBJECT" FIELD.

APPENDIX B: 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)

Narrative:	
a threat to others has been made, has the intended target been identified? (Circle One): Yes	No
Primary Target(s):	
Target Names:	
/ITNESSES (if applicable): Name of Witness:	
Affiliation:	
Contact Number:	
Intake Outcome:	
ame of Law Enforcement Official Contacted:	
ate of Law Enforcement Contact:	
ime of Law Enforcement Contact:	
Outcome of Law Enforcement Contact:	

STUDENT RISK INTAKE FORM (Page 3 of 3)

☐ Intake (Outcome(s) (Check all that apply):				
☐ If the i	individual is suspected of posing a threat of harm to others, then mobilize the threat assessment				
	team and conduct BTA within 24 hours, starting with <u>BTA Part 1: Incident Information</u> .				
	mminent threat to others is suspected, then contact law enforcement immediately. Document				
	name of the law enforcement official contacted, date/time of contact, and outcome of contact.				
	e following actions are also mandatory:				
	Itilize law enforcement to contain the threat and consult with the school safety team.				
	nitiate 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 and				
	letermining the need for law enforcement action.				
0 I	nform Principal or administrative designee of imminent threat. Principal will inform their supervisor.				
	Notify parents of intended victim(s) before they leave school grounds.				
0 N	Notify parent of the person who poses the threat and attempt to enlist their support in preventing that				
	tudent from carrying out the threat.				
	f the student is on campus and significant mental health concerns are noted, consult with a mental				
	health professional and employ Baker Act procedures, if warranted.				
	Complete and submit BCPS SIU Immediate Notification Form.				
	Mobilize full threat assessment team.				
o F	Follow discipline policy, as indicated.				
	individual is suspected of posing a threat of harm to self, then ensure the student is medically safe,				
	in adult supervision, and contact a Suicide Prevention Designee (SPD) or other mental health				
-	sional to conduct Suicide Risk Assessment (SRA) immediately (2).				
	mminent threat to self is suspected and if the student is on campus, follow Baker Act				
_	cedures immediately. If the student is not on campus, then contact law enforcement				
	nediately. If a Baker Act Assessment was initiated, document the name of the Baker Act				
	essment Initiator, the date/time initiated, and the outcome of the Baker Act Assessment if known				
(e.g	., Was the student transported to the hospital? Was the student hospitalized?).				
☐ The	e following actions are also mandatory:				
C	Ensure the student is medically safe first.				
C	Keep the student with an adult to provide supervision.				
C	Contact the SPD or another mental health professional.				
C	Contact the SRO, Local Law Enforcement or the Youth Emergency Services at (954) 677-3113.				
C					
	support plan.				
C					
	home or to a hospital.				
☐ If both	a threat to self and others is selected above, both the BTA and SRA processes must be				
	eted. Each situation is unique and needs to be assessed to determine which process to follow first. If				
-	quire assistance, please contact the Psychological Services Department (754) 321-3440 and/or				
-	ET Department (754) 321-3421.				

APPENDIX C: 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 completed 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 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.

INCIDENT INFORMATION FORM (Page 2 of 3)

nat was the context for the behavior? What was happening at the time and/or just before?	
a threat to others has been made, has the intended target been identified? (Circle One): Yes	No
	. 10
Primary Target(s):	
Target Names:	
TNESSES (if applicable): Name of Witness:	
Affiliation:	
Contact Number:	
Intake Outcome:	
me of Law Enforcement Official Contacted:	
te of Law Enforcement Contact:	
ne of Law Enforcement Contact:	
itcome of Law Enforcement Contact:	

INCIDENT INFORMATION FORM (Page 3 of 3)

If the individual is suspected of posing a threat of harm to others, mobilize the threat assessment team
and conduct BTA within 24 hours, proceeding with BTA Part 2 and Part 3.
☐ If imminent threat to others 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:

- Utilize law enforcement to contain the threat and consult with the school safety team.
- Take immediate precautions to protect potential victim(s).
- o Initiate school safety plan procedures (e.g., Code Yellow, Code Red), if warranted.
- o Consult with SRO, as appropriate, to assist in monitoring/supervising the student of concern and determining the need for law enforcement action.
- o Inform Principal or administrative designee of imminent threat. Principal will inform their supervisor.
- o Notify parents of intended victim(s) before they leave school grounds.
- o Notify parent of the person who poses the threat and attempt to enlist their support in preventing that student from carrying out the threat.
- o If the student is on campus and significant mental health concerns are noted, consult with a mental health professional and employ Baker Act procedures, if warranted.
- o Complete and submit BCPS SIU Immediate Notification Form.
- Mobilize full threat assessment team.
- o Follow discipline policy, as indicated.

Regardless of law enforcement action, the threat assessment team must gather relevant information and complete BTA Parts 2 and 3 within 24 hours of the administrator receiving the initial report. If school is not in session, the school principal must 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 (5).

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.

INITIAL STUDENT INTERVIEW (Page 1 of 2)

So In	cudent Name: chool Name: terviewer Name: terviewer #2 Name: (optional)	Student ID: Date of Interview: Interviewer Title: Interviewer #2 Title: (option	Grade:
be st	irections: Must be completed by a school-based administrator present. Please begin by attempting to establish rapport, the udent who either made a threat or exhibited a behavior of configurations the language of the questions accordingly.	n use these interview questions	as a guide to interview the
Ι.	What is your understanding of why I/we want to talk to explain the perceived threat or behavior that led to this i		t reply or does not know,
2.	I need to find out the specifics of this situation from you happened, who was involved, and what you said or deplausibility, intended victim(s), where, when, and how.)	id. (Probe for more specific	•
3.	What was the reason you said/did that? (Probe to threat/behavior.)	find out if there is a prior	conflict/history to this
1.	What are the steps you have taken or the plans you have	made toward carrying out th	ne threat?

INITIAL STUDENT INTERVIEW (Page 2 of 2)

5.	Do you have access to what you would need to be able to do this? Do you have access to any weapons (e.g., gun, knife, bomb materials, etc.)?
6.	Can you think of any problems in your life that might have led up to this threat/incident? (Seek to determine motivation and purpose of the student's actions.)
7.	Who else have you talked with about your thoughts/plans? When did you share this information?
8.	What are you thinking now? What are you going to do now?
9.	What could we do that could make things better or prevent this from happening again?

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 2)

Student Name: School Name:		Student ID: Grade: Date of Completion:		
info be 1	ormation from each of his/he	r teachers about his/her beho support plan for this student.	wior in a variety of settings	s supports for this student, we need. The information you provide will s of this student, please answer the
1.	Has the student made a d	lirect or indirect threat (ver	rbal, nonverbal, or writter	n) to your knowledge?
2.	Do you have reason to su	uspect the student has been	involved with drugs or a	lcohol? If yes, please explain.
3.	Does the student display	aggressive or disruptive c	lassroom behavior? If yes	, please explain.
4.	Does the student have po	oor school achievement, po	oor school attendance, or o	declining school productivity?
5.	Does the student have di	fficulty with social skills o	r poor peer relations?	

TEACHER INPUT FORM (Page 2 of 2)

6.	Does the student have difficulty controlling impulses, anger, or other emotions?
7.	Has the student displayed a fascination with weapons or acts of violence?
8.	Has the student been found with violent drawings or writings?
9.	Does the student externalize blame? Has the student displayed an inability to accept criticism?
10.	Are peers, and/or staff, fearful of the student?
11.	Has the student displayed recent drastic changes in behavior?
12.	Does the student appear sad or anxious?
13.	Are there indications that the student has engaged in, or been the target of, bullying?
14.	Are you aware of any current stressors the student may be experiencing? If yes, please describe.
15.	Please list any concerns you may have regarding the student or if you have any additional information you feel would be helpful.

APPENDIX F: 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.

CLINICAL PARENT INTERVIEW (Page 1 of 8)

Interviewer Title:

Student Name:	Student ID:	Grade:
School Name:	Date of Interview:	
Parent/Guardian Name:		

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.

RAPPORT BUILDING AND INTERVIEW INTRODUCTION

- 1. As you know, we are quite concerned about (Student Name) 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?
- 2. Has your child behaved this way/talked about things like this before? (Ask about previous school concerns.)

SOCIAL AND SCHOOL FACTORS

Interviewer Name:

1. How does he/she appear to get along with his/her peers? Who are his/her close friends? Does he/she seem to have a large or small group of friends? Has his/her social group changed recently? Does he/she maintain long-term friendships or seem to frequently change his/her friends? How do you feel about your child's choice of friends?

CLINICAL PARENT INTERVIEW (Page 2 of 8)

2.	How do you feel about your child's choice of friends?	
3.	Does he/she appear to be isolating himself/herself from others?	
4.	Has your child reported being teased/intimidated/rejected or bullied in some other way?	
5.	Are you aware of any relationships break (with a girl/boyfriend or best friend) in your child's life?	
6.	Does he/she currently participate in any community/extracurricular activities? If no, did he/she used to belong to any groups/teams?	
7.	Do you know how (Student Name) is doing in school in terms of grades? Behavior?	
8.	What are your child's feelings towards school? Have you noticed any changes in your child's attitude towards school in the past several months? Does your child appear to be apathetic towards school? Has he/she been having difficulties at school?	
FAMILY AND ENVIRONMENTAL SITUATIONS		
1.	Who lives in the home?	

CLINICAL PARENT INTERVIEW (Page 3 of 8)

2.	How has he/she been getting along with all family members? (Ask about parent/guardian(s) and siblings.)
3.	How is discipline typically handled in your home? Are there differences of opinion?
4.	How much time do you typically spend with your child during the week? What do you typically do together?
5.	Is there adult supervision available after school and on weekends?
6.	What music does your child listed to? What does he/she like to watch on TV/phone/computer? Do you know what they do on the internet/social media?
7.	Does he/she display a high interest level in violent video games, movies, music, television, or internet sites? If so, please explain.
8.	Has your child shown an interest in any reports of targeted violence in the media, extremist groups, or murder?
9.	Do you supervise his/her television and internet use?

CLINICAL PARENT INTERVIEW (Page 4 of 8)

family home? Does your child have experience with weapons? Does your child have an interest or fascinatio with weapons? If yes to any of these questions, please describe.
11. Are there any important events that have affected you family/child? (Ask about any recent/pending change such as: move, divorce/separation, losses, financial/employment status, or any involvement with lar enforcement/the courts.)
12. Has your child experienced any disappointment or setbacks? (Ask about disappointments that may include family relations, intimate/peer relations, school/occupational, self-image status.)
13. Has your child ever been a victim of abuse?
14. Has your child been exposed to violence in the home or in the neighborhood? If yes, please explain.
HISTORY OF VIOLENCE AND AGGRESSIVE BEHAVIOR
1. Has there been any physical or verbal aggression displayed by your child with peers or family members?
 Does your child tend to do things without considering the consequences of his/her actions first? (To evaluate impulsivity.)

CLINICAL PARENT INTERVIEW (Page 5 of 8)

3.	How does your child typically express anger? (Give examples such as acting out, passive-aggressive behaviors, and internalizing behaviors.)		
4.	Has your child ever engaged in any troubling behavior, such as following/stalking/or harassing someone? If yes, please describe.		
5.	Has your child displayed destructive behavior towards property at home or in the community?		
6.	Has your child intentionally inflicted harm on any animals or other children? If yes, please describe.		
7.	Do you have any suspicions that your child may be using drugs or alcohol?		
8.	Has your child been involved with law enforcement or the courts in the past?		
EM	EMOTIONAL AND MENTAL HEALTH FUNCTIONING		
1.	What has your child's mood been like in the past few weeks?		
2.	Has your child been unusually nervous/anxious? Irritable/short-tempered? If so, please describe.		

CLINICAL PARENT INTERVIEW (Page 6 of 8)

3.	Has your child had problems with sleep? Appetite? Energy level? Concentration? If yes, please describe.
4.	Has your child had any hospitalizations or any serious illness? Have they had any recent medical treatment or are they taking medications? Do they have any current or past medical diagnoses?
5.	Has your child ever seen a therapist/counselor due to their mood/behavior? (Ask about school and/or community providers.) Has your child ever been hospitalized under the Baker Act?
6.	Has your child displayed any self-injurious behaviors or made suicide threats?
7.	Does he/she appear to overreact to criticism and/or authority? Does your child demonstrate severe rage for seemingly minor reasons?
8.	Have you observed any behaviors that you thought were very odd or ever bizarre? (Probe for possible symptoms of psychosis [e.g., hallucinations, delusional beliefs].)
9.	Is there any history of mental health concerns on either side of the family?

CLINICAL PARENT INTERVIEW (Page 7 of 8)

PARENT'S PERCEPTION OF THE THREAT/CONCERNING BEHAVIOR

1.	Has your child expressed feelings of being mistreated and/or have they had any longstanding conflict (e.g grudges, grievances) with a peer, teacher, or other individual? If yes, please describe.
2.	Has your child told you of any plans or a desire to harm or kill others? If yes, has he/she shared a specific plan?
3.	What do you think caused your child to make the reported threat/engage in the behavior that caused the school to become concerned?
4.	Has your child made any threats to harm others in the past?
5.	Have you seen any drawing, writings, internet posts (e.g., poems, letters, social media comments) by your child that were violent or threatening in nature? If yes, please describe.
6.	Does the threat or reported behavior seem consistent with his/her behaviors/actions as of late?
7.	How concerned are you that your child might follow through with violent actions? What past behaviors or incidents support your concern?
8.	What do you think can help decrease the likelihood of him/her attempting to follow through with violent action? Is there anything that you feel might increase the likelihood?

CLINICAL PARENT INTERVIEW (Page 8 of 8)

IDENTIFICATION OF SUPPORT RESOURCES AND INTERVIEW CLOSURE

1.	Who does your child have to talk to or assist him/her when having problems? Will these individuals be available to him/her with this current situation? (Determine what supports or stabilizing factors may be available or in place, such as mental health professions, peer groups, family support, religious groups, etc.)
2.	Are there any steps that you think can be taken by the school, yourself, or (Student Name) to make thing better for him/her? (Let them know their concerns are taken seriously and help the parent/guardian come up with strategies to address his/her child's needs.)
the co	ose with a statement that describes short-term next steps and express gratitude to the parent/guardian(s) for Fir support and follow through. You may wish to inform the parent/guardian that if any emergency situation The mes up at home, they should immediately contact law enforcement and/or Mobile Crisis/Youth Emergency Tryices at 954-677-3113.

APPENDIX G: 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.

CLINICAL STUDENT INTERVIEW (Page 1 of 10)

Student Name: School Name: Interviewer Name: Interviewer #2 Name: (optional)	Student ID: Date of Interview: Interviewer Title: Interviewer #2 Title: (option	Grade:
Directions: A mental health professional must complete this in staff member may participate, if warranted. The purpose of this student and others. Therefore, this interview has two objectives:	s interview is to maintain the se	
 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. 	h as risk of suicide, homicide, p er referral or support needs. 's motives and intentions in ma	psychosis, or rage. Beyond uking the threat in order to
Please 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.		
RAPPORT BUILDING AND INTERVIEW INTRODUCTION		
1. What is your understanding of why you have been asked	ed to meet with me?	
2. We are concerned about behavior that has been reporte	d. What's your side of it?	

3. What is your understanding of why the adults at school are concerned?

CLINICAL STUDENT INTERVIEW (Page 2 of 10)

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

SOCIAL AND PEER FACTORS

1.	What do you typically do after school? Do you have any hobbies or interests?
2.	Are you involved with any groups or teams outside of school? If not, why?
3.	What are your favorite movies/video games/TV shows/music groups/internet sites? [Look for themes of violence or interest/fascination with mass shootings or other targeted violent attacks.]
4.	Do you have any social media accounts? What kind of pages or people do you follow? [Look for themes of violence or interest/fascination with mass shootings or other targeted violent attacks.]
5.	Who are your friends? How long have you been friends with them? Do you have a best friend? How long have you been best friends? Have you had a problem with any of your friends recently?
6.	How would you describe the kids at your school? Are there any groups of kids that you don't get along with? [To identify potential targets]

CLINICAL STUDENT INTERVIEW (Page 3 of 10)

1.	How would your classmates describe you? Is that an accurate description? Do you feel they misunderstand you?
2.	Do you get teased or bullied by other children? Is there anyone who makes you feel afraid? [Probe for concerns at school and outside of school.]
3.	Have you recently broken up with a girlfriend or boyfriend? Have you recently ended a good friendship? If yes to either, what happened?
4.	Have you been pulling away from your friends or do you feel isolated recently?
FA	AMILY, SCHOOL AND ENVIRONMENTAL SITUATIONS
1.	Who do you live with (parent/guardian)? How well do they know you? What are their work hours? [These questions will provide information regarding supervision available to child.]
2.	Do you do any family activities together? How often? What do you typically do?
3.	Does anyone in your family seem sad or angry?

CLINICAL STUDENT INTERVIEW (Page 4 of 10)

4.	Have you experienced any recent changes in your life? Do you foresee any upcoming changes in your life? [Ask about family move, death of family or friend, parents/guardians separating or divorce. Also ask about potential losses or disappointments that may include family relations, intimate/peer relations, school/occupational, self-image/status.]
5.	Do you think you are treated fairly?
6.	Do your parents/guardians ever have to punish you? Usually for what reasons? How do your parents/guardians typically punish you?
7.	Do your parents/guardians know what you watch on TV/your phone/your computer? Do your parents know what you do on the internet/social media?
8.	Have you tried using any drugs or alcohol? Are you using any drugs or alcohol now? [If yes, ask what and how often they are using.]
9.	Do you have difficulty in school? [If yes, query about specific areas of difficulty.]
10.	. How important is it to you to do well in school?

CLINICAL STUDENT INTERVIEW (Page 5 of 10)

11	. How do your parents/guardians react to your school performance? Do you worry that your parents/guardians will punish you for doing poorly in school?	
HISTORY OF VIOLENT OR AGGRESSIVE BEHAVIOR		
1.	Have you ever hurt an animal while playing around? Have you ever hurt any other animals on purpose? [If yes, ask for details.]	
2.	Have you ever damaged your own property or someone else's property? [If yes, ask for details.]	
3.	Do you ever pick on or bully other children? [If yes, ask for details.]	
4.	Have you ever seen or heard of someone being seriously hurt? Have you ever seen or heard of violence in your neighborhood? How did that make you feel?	
5.	Have you ever purposely hurt someone in the past? [If yes, ask for details.]	

CLINICAL STUDENT INTERVIEW (Page 6 of 10)

6.	Do you get into fights? In school? Outside of school?
7.	Do you feel it is necessary to get back at someone when they hurt you or do something to you? [If yes, ask for details.]
8.	Have you ever followed, stalked, or harassed someone? [If yes, ask for details.]
9.	Have you ever been in trouble with the police? If yes, what happened?
10.	Have you thought about or wished you could hurt someone else? [If no, go to next section. If yes, ask the following questions.]
11.	How often do you have those thoughts and how close have you come to acting on them? [Probe for details regarding who, how, when and where.]
12.	Do you think you would be able to stop yourself from hurting the person(s) if you wanted to? [If yes, ask fo details.]

CLINICAL STUDENT INTERVIEW (Page 7 of 10)

13. How do you think others view you when you make a threat or behave aggressively?
14. Do you have access to a weapon? [If yes, find out what type of weapon, location, and if they have shown to anyone.]
15. Have you ever brought a weapon to school? Did you show it to anyone or tell anyone you had it on you?
16. What steps have you taken to carry out your plan? Have you ever practiced your plan? If yes, what did yo do and how did it make you feel?
17. Have you told anyone about this desire to hurt others or your plan to do so?
DEPRESSION AND OTHER EMOTIONAL CONCERNS
1. How do you feel most days of the week? Do you ever feel upset, worried, sad or depressed? Do you know why?
2. Do you ever feel that no one cares about you or loves you? [If yes, ask for details.]

CLINICAL STUDENT INTERVIEW (Page 8 of 10)

3.	What makes you angry? Are you angry at anyone right now? What do you do when you get angry? Has your temper ever gotten you in trouble?
4.	Do you have any difficulties with sleeping, eating, or concentrating? [If yes, ask for details.]
5.	Do you ever feel lonely? Do you prefer to be alone? [If yes, ask for details.]
6.	Do you blame yourself for things that happen?
7.	How do you handle or deal with stress or anger? [Inquire about coping skills such as journaling, exercise, reaching out to social supports, use of drugs/alcohol, etc.]
8.	Have you had any unusual experiences lately? Have you heard things that others cannot hear or seen things that others cannot see? [Probe for delusions/hallucinations and details related to those symptoms.]

CLINICAL STUDENT INTERVIEW (Page 9 of 10)

SUICIDAL FANTASIES OR ACTIONS

1.	Have you ever thought of hurting yourself or ever hurt yourself on purpose (e.g., cutting, burning, etc.)?
2.	Have you had any thoughts about killing yourself? [If no, go to next section. If yes, ask the following questions.]
3.	Do you feel like that right now?
4.	Have you thought about how you might do this?
5.	Have you decided when you would do this?
6.	Have you taken any steps to get the things you need to do this? [Look for examples such as giving away valuables, obtaining means to carry out the act, writing a will or suicide note, etc.]
7.	Why did you want to (or try to) kill yourself?

CLINICAL STUDENT INTERVIEW (Page 10 of 10)

8.	What made you decide not to kill yourself?
ID	ENTIFICATION OF SUPPORT RESOURCES AND INTERVIEW CLOSURE
1.	Who do you have to talk to or assist you with this situation? [Determine what supports or mitigating factors may be available or in place such as mental health professionals, peer groups, family support, religious groups, etc.]
2.	What could the school, your parents, or you do that could make things better? [Let them know their concerns are taken seriously, and help the student come up with strategies to address his/her legitimate concerns.]
3.	Given where things stand right now, what are you thinking about or planning to do at this point?

APPENDIX H: BTA Determination of Risk Level

The points for consideration which are listed below are not intended to be an exhaustive list. Each case involves many pieces of information and assessors should consider the totality of facts and circumstances. No individual factor listed below should be determinative in arriving at a level of concern. Conversely, it is not necessary for each factor to be present in a case before assessors are able to assign the corresponding level of concern.

UNFOUNDED:

Following a threat assessment, the threat could not be corroborated or substantiated.

- > False accusation of a threat
- Due to the lack of supporting evidence (e.g., documentation, witness statements, etc.) the student was not deemed to have made or pose a threat

LOW THREAT RISK:

Person/situation does not appear to pose a threat of violence and any underlying issues can be resolved easily.

- A communication has been received or reported that causes some concern about potential for violence; it may be confusing, unrealistic or *improbable* (e.g., "I will plant a nuclear bomb at work.") or make no allusions to violence at all.
- A clear *grievance* may not be stated or implied. If the person seems to have developed a grievance, it may not be to the level where violence appears justified in addressing it.
- > The threat or other behavior may serve as venting rather than actually warning of future predatory violence.
- Even though the individual may have made a threat, it may appear through his/her actions and communications that he/she appears to be seeking a peaceful resolution of an issue.
- The communication or person may not have offered details to establish *credibility* or *viability* of the threat.
- The communication may reference information that is *inaccurate* about the target, suggesting a lack of inside knowledge.
- > The person is unlikely to have access to the means or the potential target in order to carry out the threat.
- The communication is *vague* and *indirect* or may suggest a lack of overall commitment to follow through on a threat.
- The method of delivery is *indirect* (e.g., anonymous letter versus a letter hand-delivered to the target).
- Acting out violently may not currently be an acceptable means for him/her to achieve justice; this may be influenced by moral codes, spiritual/religious beliefs, a fear of legal sanctions, or other reasons.
- There does not appear to be a pressing time/deadline for resolution.
- The person may have evidenced few to no warning behaviors.
- The person may not have a significant number of *risk factors* and *protective factors* (e.g., parental support, counseling, peer relationships) are in place that mitigate the risk of violence.
- ➤ Low level suggests that the concern for future violence is low. Additional data gathering may be desirable and monitoring for any changes in violence risk factors or warning behaviors may be appropriate.

MEDIUM THREAT RISK:

Person/situation does not appear to pose a threat of violence at this time but exhibits behaviors that indicate a continuing intent to harm, and/or potential for future violence, and/or exhibits other concerning behavior that requires intervention.

- The person may have a *grievance* and is more likely to be considering violence as an option for resolution or as a means to achieve justice.
- There may be no sense of urgency in the communication; the person may still be pursuing peaceful alternatives to resolving his/her grievance. If a deadline is given, it may allow time for the threat assessment team to respond and find a resolution to the grievance.
- The person may not have made a decision about whether to act out violently (e.g., "I don't want to hurt them, but no one is helping me.")
- The person may have surpassed some of the low level of *concern factors*, or there is an absence of significant *protective factors* (e.g., parental support, peer relationships).
- > Others may be concerned about the person potentially acting out violently.
- The person may exhibit a cluster of *warning behaviors*, potentially combining both expression and action.
- The person may be engaged in the *research* and *planning* phase of a possible attack (e.g., information gathering and basic research pertaining to a target.)
- The person may have an increased number of *stressors* or *risk factors* (e.g. acting out violently, disappointment/failure, a paranoid personality disorder, substance abuse, or instability in employment and relationships). At this point in time, these factors may or may not be appropriately managed by the person or those around him.
- ➤ There may be significant information lacking from the investigation about the person, the potential victim, the context of the threat, or other substantial aspects, which make pinpointing a level of concern difficult. Critical factors which could impact the assessment one way or another are missing.
- ➤ This **Medium** level suggests that violence could possibly occur, although the situation is not urgent. Violence cannot be ruled out. The threat assessment team may not have complete or accurate information to guide the outcome of the assessment. Monitoring and additional actions are necessary or desirable.

HIGH THREAT RISK:

Person/situation appears to pose a threat of violence, exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the plan, and may also exhibit other concerning behavior that requires intervention.

- The communication may reflect an increase in *intensity* and/or *severity* in the tone and content—particularly in a series of communications, as well as the person's use of multiple methods of delivery (e.g., in-person, telephone, fax, mail, electronic, etc.).
- The language of the threat appears less emotionally driven and more action-oriented, suggesting that the person is operating in a predatory, as opposed to an emotional, reactive, or impulsive mode.
- The person has the means and ability to carry out the threat.
- The person has conducted research on the target and has necessary inside, personal, or background information on potential victim(s). It strongly suggests he/she has the knowledge necessary to approach and attack.
- > The communication may indicate directions are being received from a higher power or that the person is experiencing delusions that encourage violent action.
- ➤ The communication may be *directed* and *fixated* on a cause or a person. There is a *terminal* theme to the communication, as if the relationship between the communicator and his/her target will soon be over.
- The individual may convey that action may be taken to end the *grievance* and achieve resolution.
- > The person may feel violence is the only available method of achieving justice and/or appears willing to accept all negative consequences resulting from violence.
- ➤ Highly concerning communications do not generally name the precise time, place, or target in advance. However, communications may reference a time/deadline or suggest the person is losing patience.
- The person appears to have begun preparing or finalizing *plans* for a violent act. Such *preparations* may include: weapons acquisition or training/practice that are out of character for the individual and an escalation from his/her norm; evidence suggests increased focus and time spent on research and planning (e.g., surveillance, suspicious investigating, or approaches to the target location.)
- The person may have virtually or actually *rehearsed* the attack as a means to ensure he/she has both the ability and the internal will to commit violence.
- > The person has exhibited highly concerning *warning behaviors*. Suicidal/homicidal ideation is likely to be present.
- The person may exhibit a combination of serious mental illness, substance abuse or dependence, a history of violence or family of origin violence exposure, and/or other *risk factors*.
- > The person of concern may desire recognition and fame and believe that violence can help him achieve this.
- > Stressors in the person's life appear to be escalating and his/her abilities to cope with them appear diminished.
- This **High** level of concern suggests the person of concern is reaching a critical point on a pathway to violence from which he/she perceives it may be difficult to turn back. This level suggests that violence is possible and could occur within the near future following any precipitating events. Immediate and continuing attention is required from threat management resources to ensure violence does not occur.

IMMINENT THREAT RISK:

The persons/behavior/situation poses a clear and immediate threat of serious violence towards self or others that requires containment and action to protect identified or identifiable target(s) and may also exhibit behaviors that require immediate intervention.

- The communication suggests that *protective factors* that prevent violence are diminishing (e.g., loss of counseling, mentorship, peer relationships). Circumstances in the person's life may be rapidly changing so as to force the action and a timeframe may be indicated.
- > The communication suggests the person perceives his/her window of opportunity for an attack to be rapidly closing due to any number of *circumstances*, *stressors*, or *precipitating events*.
- ➤ The communication itself indicates that a *breach* or *attack* has begun or been completed; may indicate *intent* to die as a result of the attack; appears intended to claim credit for an attack, attempts to provide rationale for an attack or establish a legacy.
- Some *warning behaviors* demonstrated by a person of high concern could be associated with possible *imminence*, such as energy burst behaviors (e.g., preparing equipment, conducting spot checks of a target location, buying needed supplies, and/or repeated posting online), last resort behaviors, end of life planning, sudden cessation of medications or other substance use, and sudden withdrawal from usual interests, activities, or people.
- > Imminent level of threat risk indicates that violence is likely to occur within hours or weeks and all efforts should focus on locating, containing, and neutralizing the threat of violence. When indications of imminence are observed, a law enforcement response is warranted to disrupt behaviors that may be leading to violence.

APPENDIX I: 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://bcps-mentalhealth.com/

For assistance with threat assessment 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 *DMS/discipline*:

School Climate & Discipline (754) 321-1655

For assistance with SEDNET referrals, community mental health providers, suicide prevention and Baker Act:

SEDNET (754) 321-3421

For assistance with SEL and counseling services:

Family Counseling (754) 321-1590

School Counseling (754) 321-1627

For assistance with *substance abuse prevention*:

School Climate & Discipline (754) 321-1655

Special Investigative Unit (SIU School Police) (754) 321-0725

Compliance Audit – Threat Assessment Policy & Procedures Internal Audit Report Issued: August 3, 2021



APPENDIX VIII: BTA TECHNICAL UPDATES

Behavioral Threat Assessment (BTA) Technical Updates

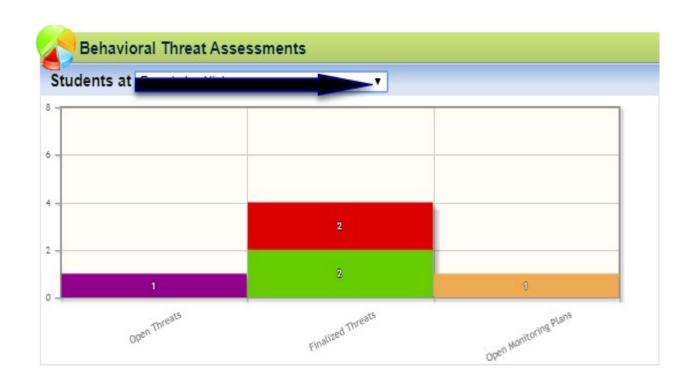
October 2019

Tara Rodger, EMS Manager, Exceptional Student Learning Support

Office number: 754-321-3437

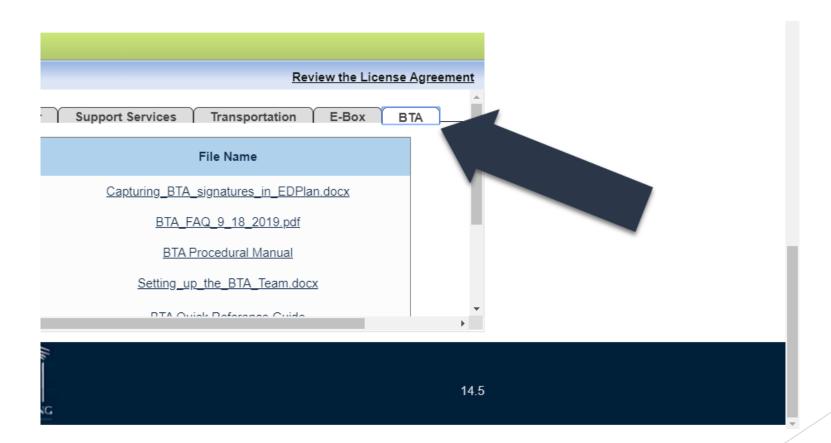
Cell Phone number: 954-801-9919

Check your open threats



*Review open threats for completion and finalize within 24 hours.

Resource Information BTA Tab



Principals will now acknowledge the threat

Meeting Participants				
Name		Role Administrator		
	*	Mental Health Professional		
	<u>*</u>	Law Enforcement Official		
	*	Teacher		
		Other	<u>*</u>	

ACKNOWLEDGE THREAT ASSESSMENT

Documenting Completion of a BTA

- Along with the finalized BTA in EdPlan, completed threat assessments must be documented in TERMS by a member of the BTA team. The BTA team member will enter the TERMS L-Panel code that corresponds with the determined risk level:
 - ► 220-Schl Safety <u>Unfounded</u>
 - ► 221-Schl Safety <u>Low</u>
 - ► 222-Schl Safety <u>Medium</u>
 - ► 223-Schl Safety High
- The TERMS Intervention code must be assigned to the 3-digit contact code for the lead administrator on that student's BTA (principal or AP who participated as the administrator on the team).

TERMS Co5 Panel

Document Name: untitled

PANEL: C05. STAFF/FACULTY

YEAR: 20

SCHL: 1901 PIPER HIGH

NBR T FIRST NAME LAST NAME

SHORT NAME

004 S TBA

MATH

иатн тва

MATH

EMAIL

SSN 000000000 S F R W BLDG-RM

STARTS-ENDS 082002

SDE 0000000000 DP

RDG: N PERS: 91901004 AREA EXP: A T

FND SRC: N

FLEID:

Document Name: untitled

PANEL:

L27. STUDENT SUPPORT INTERVENTIONS

YEAR: 20

STDT: 0617100214 TESTSTUDENT, TEST

SCHL:

GR:

COMMENT: N

STATUS:

REASONS:

WITH:

BIRTH: 06102011 OVER AGE:

PSYC EVAL:

SOCIAL WORKER EVAL:

ESE:

DROP PREV:

DJJ: N HI-RISK MED:

LUNCH ST:

CONCUR ENROLL:

504 PLAN: N ELL: N REASSIGNED: N PSYC CASE NBR:

MOST RECENT CONFERENCES:

STUDENT:

PARENT:

TEACHER:

CHILD STUDY:

A

INTV

C FLA D

ASSIGN

D INTERVENTION

DATE

CONTACT

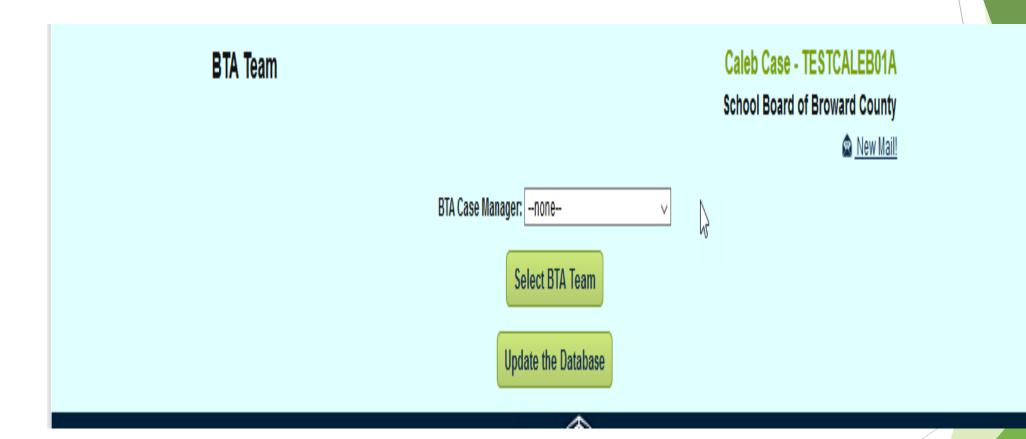
M MIN C SCI

220 SCHL SAFETY UNFOUNDE 09202019 004 MATH TEA

C SCHL DATE

3-digit Contact Number for Administrator who acted as the lead on the student's BTA

BTA Team Tab



For existing open threats please click here to re-establish your team For all new threats, ONLY use this tab and the Family/Other tab

Scanning back Signatures

Upload Attachments Caleb Case - TESTCALEB20 School Board of Broward County (5 Documents) Upload Attachments for Caleb Case Permitted file extensions are: PDF, DOC, XLS, TXT, RTF, PPT, TIF, JPG, PNG, XLSX, PPTX, and DOCX Update the Database View Document Batch No file may be greater than 25.00 MB in size. **Date Generated Document** Upload External Attachment(s) 14788748 09/26/2019 Behavioral Threat Assessment 14724442 09/10/2019 Teacher Input Form Change Fax Labels 14724373 09/10/2019 Initial Student Interview 14714232 09/06/2019 Student Risk Intake Form 14682994 08/23/2019 Behavioral Threat Assessment File Name (if not provided the file name will be used) Choose File | Caleb Case Signatures.pdf

New Mail!

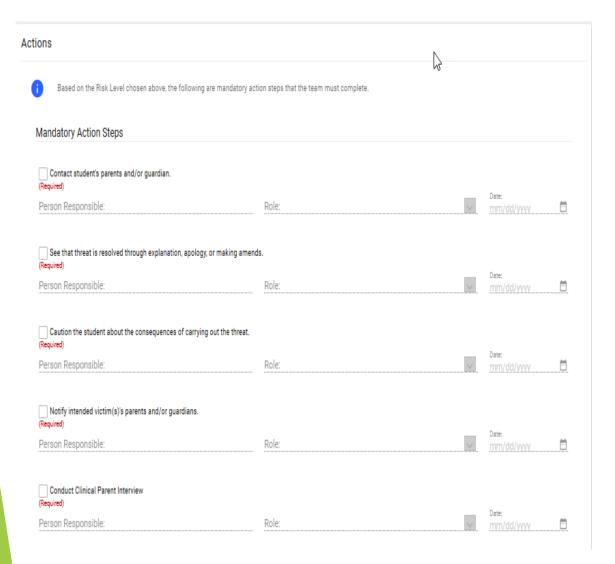
Documents created for Caleb Case

Upload File

Del	Doc ID	Date Generated	Generated By	<u>Document</u>		Batch	Status	Del	Attachment	Batch Attachment	Date Received	Signatures
	14788748	09/26/2019	Test Principal0020	Behavioral Threat Assessment	PDF	0	Final	0	<u>Caleb Case Signatures</u>		10/04/2019	
Е	14724442	09/10/2019	Test Principal0020	Teacher Input Form	PDF		Final					
E	14724373	09/10/2019	Test Principal0020	Initial Student Interview	PDF		Final					
E	14714232	09/06/2019	Test Principal0020	Student Risk Intake Form	PDF		Final					
	14682994	08/23/2019	Test Principal0020	Behavioral Threat Assessment	PDF		Final					

An 'E' in the 'Del' column indicates that the document is associated with an Event. A 'C' in the 'Del' column indicates that the document is associated with a Parent Contact. In either case, the document can't be deleted until the associated event or contact is deleted. An 'A' in the 'Del' column indicates that the document is associated with another Document and it will deleted when the associated document is deleted.

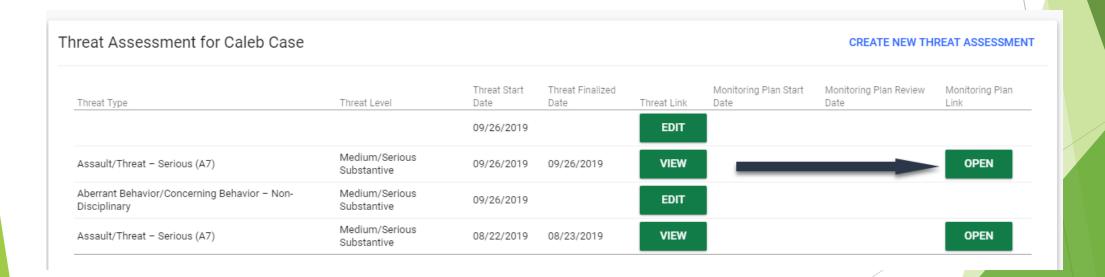
Changes to Actions in Part 3



Additional Team-Determined Action Steps 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. Student conference Person Responsible: Parent Conference Person Responsible: Assign Mentor Mentor Name: Alter schedule to minimize contact with targeted individual Person Responsible: Develop a crisis plan to address unsafe behavior (Indv Plan) Person Responsible:

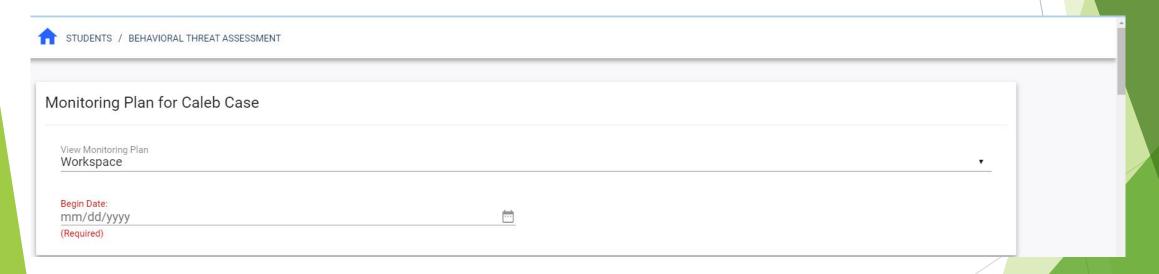
Monitoring Plan

- Once a threat has been finalized the system will give you a green button for a monitoring plan
- If it is not needed do not click on the button



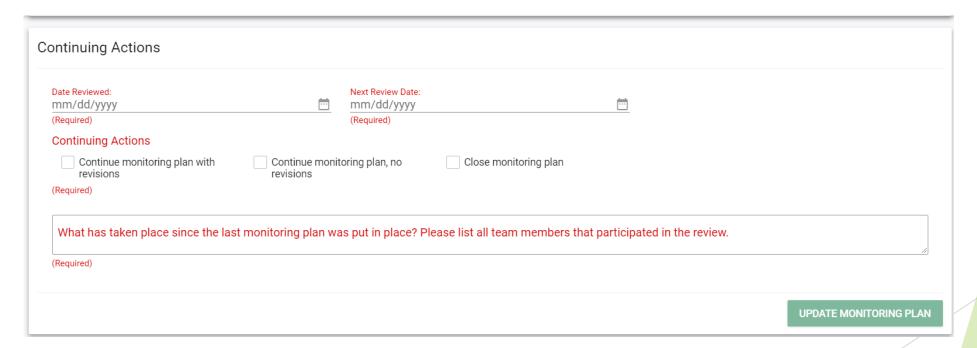
Monitoring Plans

► The first time you click on the button it will open and you need to add the information



Reviewing Monitoring Plans

View the plan and at the bottom you will see this box



Once you click on update it will put you back in the workspace to make changes or additions. If you choose close out then the plan is finished.

Things to remember

- Make sure you have the most recent BTA Manual available to assist you in the process
- If you have procedural content questions, contact Psychological Services 754-321-3440
- You can find this PowerPoint on the main menu page in the Resource Information section under the BTA tab

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