



Broward County Public Schools, Florida

Compliance Audit – Threat Assessment Policy & Procedures

April 20, 2022

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TRANSMITTAL LETTER

April 20, 2022

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Pursuant to the approved Statement of Work dated May 19, 2021, 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.12/17/2020” 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 opened up the opportunity to return to in-person student learning on October 9, 2020. A hybrid remote learning environment option continued for the remainder of school year 2020-2021. Due to the timing of 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 2020-2021.

Scope and Methodology

We held a kickoff meeting with representatives from the District’s Office of Academics team and the Office of the Chief Auditor (Internal Audit) on July 29, 2021, to gain an understanding of the threat assessment process, with an emphasis on the updates to the process since our original audit. We held virtual walkthroughs 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 343 threat assessments out of EdPlan from the period of January 2021 through April 2021. Internal Audit requested that we remove Charter Schools, unfounded threats, and duplicate system entries from the population we received, as well as having the sample be inclusive of all very serious substantive and serious substantive level threats. Per Internal Audit’s direction, we judgmentally selected a sample of 75 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 11.

TRANSMITTAL LETTER - CONTINUED

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.

Total Population				
School Type	Very Serious Substantive	Serious Substantive	Transient	Totals
High School	7	11	16	34
Middle School	3	12	198	213
Elementary School	2	9	32	43
Centers	0	7	46	53
Totals	12	39	292	343

Our sample was selected with a specific focus on the serious substantive and very serious substantive risk threats, as requested by Internal Audit. The 48 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 48 attributes that were tested within the 75 threats sampled. A detailed listing of the results are included in the “Detailed Observations and Related District Staff Response” section of this report.

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 2020 Behavioral Threat Assessment (BTA) procedures manual, effective December 17, 2020. This process was implemented during the 2020-2021 school year.

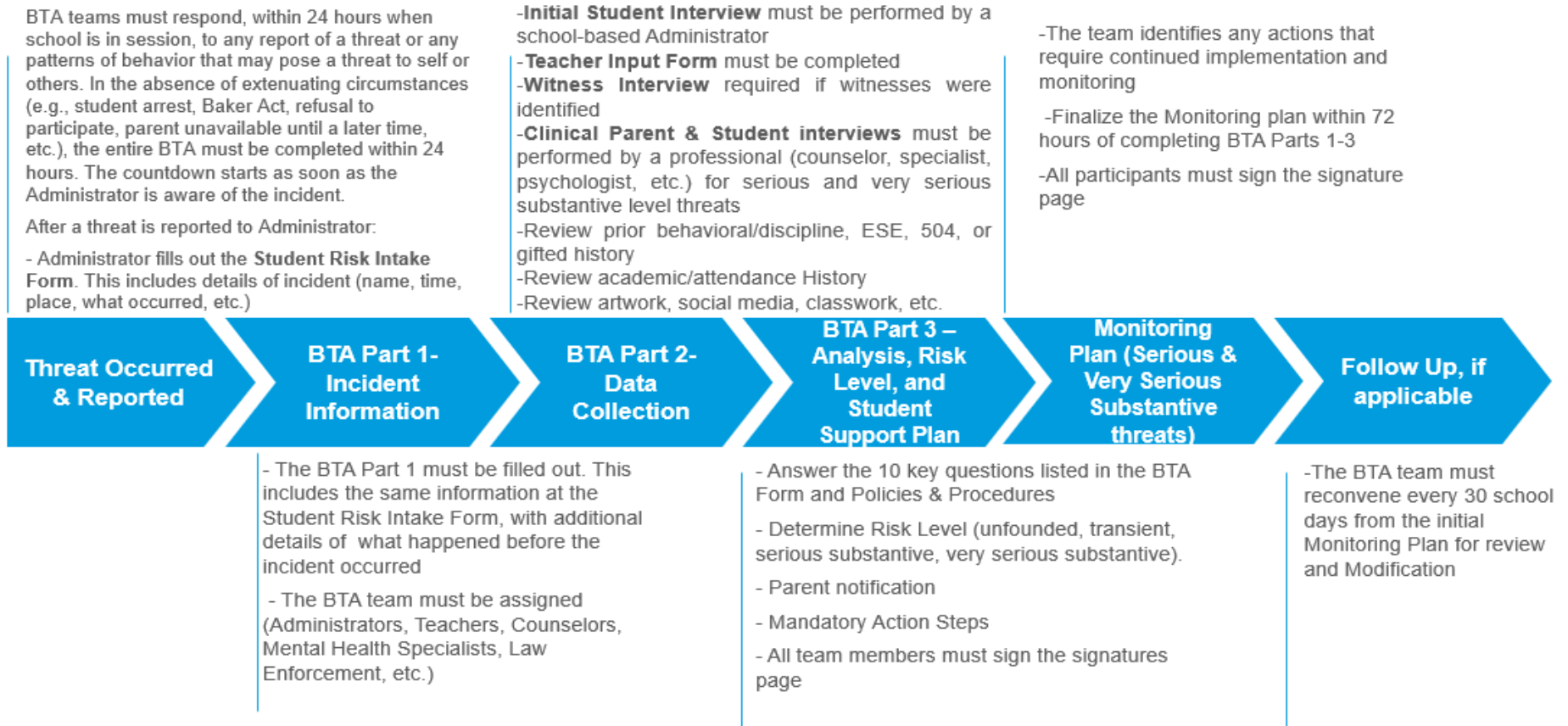
Since the implementation of EdPlan, there have been several internal trainings and updates to the system, beginning in October 2019. Further updates followed during school year 2021: August 2020, December 2020, March 2021, June 2021, August 2021, and December 2021. These systematic updates improved processes and corrected known system glitches. The system updates are summarized in the table below. To reference the full timeline since the implementation of Edplan to the date of the report, refer to *Appendix IV* herein.

August 2020	December 2020	March 2021	June 2021	August 2021	December 2021
<ul style="list-style-type: none"> When a Student Risk Intake Form is finalized, a threat assessment is generated For both the BTA (Behavioral Threat Assessment) 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 	<ul style="list-style-type: none"> Changes made to the school profile form for the core BTA team automatically update the school’s core team pages when a new School Profile Form (SPF) is finalized for a school 	<ul style="list-style-type: none"> Update to allow for required participants on a BTA to change depending on risk level. 	<ul style="list-style-type: none"> Changes made to BTA team page to remove the case manager field and allow for label changes to BTA team. Addresses issues where the Safety Plan was looking like a monitoring plan upon completing a plan review. 	<ul style="list-style-type: none"> Document update to include the school year in which the document was created within 	<ul style="list-style-type: none"> New feature to allow for electronic signing of BTA documents and Monitoring/Safety Plans.

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



SY 20 vs SY 21 COMPARISON

The chart below shows the attributes that were tested in the prior year audit (SY 2019-2020), the current year audit (SY 2020-2021), and their results. The columns labeled SY 20 and SY 21 are the number of exceptions that were found for each attribute. Please note the items designated with “N/A” below, were either not tested in the prior year or they were not comparable to the current year. The attribute numbers listed below relates to SY 2020-2021 audit. Please refer to the SY 2019-2020 report for the prior year attribute numbers, as they have changed. Overall, the results show a vast improvement the District has made since the previous audit.

		Sampled: 200 Substantive: 165		Sampled: 75 Substantive: 51		
Attributes		SY 20	% Failed SY 20	SY 21	% Failed SY 21	SY 21 Comments
School BTA Roles	1 Did the school principal identify members of a BTA team that includes persons with expertise in counseling, instruction, school administration, and law enforcement?	N/A		5	10%	Out of 50 schools tested
	2 Did the school principal assign school-based staff members to monitor and respond to all incoming reports where safety is of concern?			1	2%	Out of 50 schools tested
BTA Training	3 Did all school-based administrators and BTA team members attend and complete mandatory district threat assessment trainings? (Threat Assessment Procedures)			101	28%	Out of the 355 employees listed as BTA/admin members who should have completed the training
	4 Did all mandatory team members report their completion of mandatory training to their supervisor?			101	28%	
	5 Did the BTA team provide annual training and guidance to students, staff, and parents on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting?			0	0%	
Student Intake Form	6 Was the Student Risk Intake Form present in EdPlan?	21	11%	0	0%	
	7 Was the Student Risk Intake Form substantially completed?	0	0%	0	0%	
	8 Was the Student Risk Intake Form listed as a finalized document on the EdPlan Documents tab?	29	16%	0	0%	
	9 Was the Student Risk Intake Form completed by the school-based administrator?	0	0%	2	3%	
	10 Were the mandatory immediate actions taken and documented if an imminent threat has been identified?	0	0%	0	0%	
Initial Phase/Triage Process	11 Was the Initial Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	31	16%	1	1%	Note - This interview was completed but not in EdPlan, as required.
	12 Was the Initial Student Interview Form substantially complete?	0	0%	0	0%	
	13 Was the Initial Student Interview completed by the school-based administrator?	0	0%	3	4%	
	14 Was the Teacher Input Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?	40	20%	2	3%	Note - These forms were completed but not in EdPlan, as required.
	15 Was the Teacher Input Form substantially complete?	0	0%	0	0%	
Witness Interview(s) (required only if any witnesses were identified)	16 Was the Witness Interview Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?	N/A		15	37%	Out of the 41 samples who identified a witness. Note - Out of the 15 samples, 12 had witness interviews, however, were not uploaded to EdPlan, as required.
	17 Was the Witness Interview Form substantially complete?			1	3%	Out of the 38 witness interviews that were present
	18 Was the Witness Interview completed by the school-based administrator?			0	0%	
BTA Part 1: Incident Information	19 Was the Behavioral Threat Assessment created in EdPlan?	0	0%	0	0%	
	20 Was the BTA Part 1 substantially complete?	0	0%	0	0%	
	21 Were the necessary BTA team members mobilized within 24 hours (when school was in session or no later than the end of the first day school was back in session); if no, was a reason for delay documented in EdPlan?	17	9%	0	0%	
BTA Part 2: Data Collection	22 Was the BTA Part 2 substantially complete?	N/A		0	0%	
	23 If the student previously exhibited behaviors of concern or posed a threat, was the description (narrative) of prior incidents substantially complete?	0	0%	0	0%	
Clinical Interviews (required for Substantive Threats only)	24 Was the Clinical Parent Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	N/A		0	0%	
	25 Was the Clinical Parent Interview substantially complete?	34	21%	0	0%	
	26 Was the Clinical Parent Interview completed by mental health professional?	13	10%	0	0%	
	27 Was the Clinical Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	39	24%	0	0%	
	28 Was the Clinical Student Interview substantially complete?	0	0%	0	0%	
	29 Was the Clinical Student Interview completed by a mental health professional?	11	9%	1	2%	

SY 20 vs SY 21 COMPARISON – CONTINUED

		Sampled: 200 Substantive: 165		Sampled: 75 Substantive: 51		
Attributes		SY 20	% Failed SY 20	SY 21	% Failed SY 21	SY 21 Comments
BTA Part 3: Analysis, Risk Level, and Student Support Plan	30 Was the BTA Part 3 substantially complete?	N/A		0	0%	
	31 Was the parent/guardian contacted?	0	0%	1	1%	Out of 74 minor students
	32 Was the parent/guardian contact documentation (narrative) substantially completed?	0	0%	1	1%	Out of 74 minor students
	33 Was the BTA finalized in EdPlan?	0	0%	0	0%	
	34 Was the BTA finalized within 24 hours; if not, was the reason documented?	108	54%	33	44%	
	35 Was the Signatures page of the BTA uploaded to the BTA in EdPlan?	0	0%	0	0%	
	36 Was the BTA signed by all team members as required?	86	43%	1	1%	
	37 Did the Principal acknowledge BTA in EdPlan? (within approx. 48 hours)	0	0%	30	40%	Note - 28 of the 30 (93%) were acknowledged, however, not within approximately 48 hours as required.
	38 Did the Cadre Director acknowledge BTA in EdPlan?	N/A		15	20%	
Monitoring Plan (required for Serious/Very Serious Substantive Threats)	39 Was the completed BTA documented in TERMS?	87	44%	0	0%	
	40 Was the Monitoring Plan created?	99	60%	0	0%	
	41 Was the Monitoring Plan finalized in EdPlan?	3	5%	11	22%	Out of the 51 serious & very serious substantive level threats
	42 Was the Monitoring Plan finalized within 72 hours of completing BTA parts 1-3?	52	83%	15	38%	
	43 Was the Signatures page of the Monitoring Plan uploaded to the BTA in EdPlan?	3	5%	0	0%	
	44 Was the Monitoring Plan signed by all monitoring plan meeting participants?	66	100%	25	63%	Out of the 40 serious & very serious substantive level threats that were finalized
	45 Was the Monitoring Plan reviewed/modified by all team members every 30 school days (or earlier if warranted).	54	82%	10	25%	
Transferred Students: Continuation of Intervention Services	46 Was the Monitoring Plan documentation maintained for all actions selected on the monitoring plan, when applicable.	0	0%	2	4%	Out of the 51 serious & very serious substantive level threats
	47 Did the administrator at the receiving school of a transfer student, within the district, review the BTA file in EdPlan within 72 hours?	N/A		0	0%	
	48 If notification of the student's transfer to an out-of-district school was received, did the BTA team confirm that intervention services remain available, as applicable, until the BTA team of the receiving school independently determines the need for intervention services?	N/A		0	0%	

SY 20 vs SY 21 RISK RATING COMPARISON

The chart below shows the attribute and document type by their respective risk ratings and observation number that were tested in the prior year audit (SY 2019-2020) and the current year audit (SY 2020-2021).

Document	Attribute Summary	Prior Year Observation & Risk Rating	Current Year Observation & Risk Rating
BTA Roles	School Principal identify key members of the BTA team	Not tested	Observation #1 - Low
BTA Training	Identified members of the BTA team did not complete mandatory trainings	Not tested	Observation #2 - High
Student Risk Intake Form (SRIF)	SRIF Missing	Observation #1 - Low	None noted
	SRIF not finalized	Observation #1 - Low	None noted
	SRIF not completed by school-based administrator	None noted	Observation #3 - Low
Initial Student Interview (ISI)	ISI Missing	Observation #3 - High	Observation #4 - Low
	ISI not completed by school-based administrator	None noted	Observation #4 - Low
Teacher Input Form (TIF)	TIF Missing	Observation #3 - High	Observation #4 - Low
Witness Interview	Missing Witness Interview	Not tested	Observation #5 - Low
Behavior Threat Assessment 1-3 (BTA)	BTA team not mobilized within 24 hours of report	Observation #2 - High	None noted
	BTA not finalized within 24 hours	Observation #2 - High	Observation #7 - High
	Missing signature	Observation #2 - High	Observation #7 - High
	Threat unable to be located within TERMS	Observation #2 - High	None noted
	No Parent Notification	None noted	Observation #7 - High
	Principal Acknowledgement of BTA	None noted	Observation #7 - High
	Cadre Director Acknowledgement of BTA	Not tested	Observation #7 - High
Clinical Parent & Student Interviews	Clinical Parent Interview missing	Observation #4 - High	None noted
	Clinical Parent Interview was not completed by a mental health professional	Observation #4 - High	None noted
	Clinical Student Interview missing	Observation #4 - High	None noted
	Clinical Student Interview was not completed by a mental health professional	Observation #4 - High	Observation #6 - High
Monitoring Plan (MP)	Missing MP	Observation #5 - High	None noted
	MP not finalized	Observation #5 - High	Observation #8 - High
	MP were not finalized within 72 hours	Observation #5 - High	Observation #8 - High
	Missing signature page	Observation #5 - High	None noted
	Missing signatures	Observation #5 - High	Observation #8 - High
	MP not reviewed within 30 days by BTA team members	Observation #5 - High	Observation #8 - High

OBJECTIVES AND APPROACH

Objectives

Our procedures were performed in accordance with the scope and approach set forth in our executed scope of work, dated May 19, 2021 and were limited to those described therein. The scope period was January 2021 through April 2021. Fieldwork was performed from June 2021 through March 2022. Several meetings were held with BCPS personnel during this time to discuss system updates and to vet the results of the report.

The specific objectives of this project were:

- Obtain an understanding of the Threat Assessment Process.
- Obtain an understanding of the EdPlan system used to manage threat documentation and retention procedures.
- Review written policy, procedures and established practices, and documentation thereof.
- Test a sample of 75 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 virtual walkthroughs with management to obtain an understanding of the threat assessment process, documentation and reporting, including updates and changes to the process related to recent automation;
- Reviewed the 2020 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 75 threats during the scope period (January 2021 to April 2021). The objectives of our testing was to determine if the required forms were: 1) entered or uploaded into EdPlan, 2) substantially complete, and 3) completed/signed by the appropriate member of BCPS, if applicable. *Please note, RSM did not test for appropriateness of the content of the files or the District's threat assessment process.* We tested for existence and completeness, among other attributes, for the following:

- Student Risk Intake Form
- Behavior Threat Assessment
- Initial Student Interview
- Witness Interview, if applicable
- Teacher Input Form
- Clinical Parent and Student Interview, 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 very serious substantive and serious substantive threats. A total of 343 threats were reported by school-based administrators during our scope period of January 2021 to April 2021, excluding charter schools, unfounded threats, and duplicate system entries.

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

Total Population				
School Type	Very Serious Substantive	Serious Substantive	Transient	Totals
<i>High School</i>	7	11	16	34
<i>Middle School</i>	3	12	198	213
<i>Elementary School</i>	2	9	32	43
<i>Centers</i>	0	7	46	53
Totals	12	39	292	343

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 75. Internal Audit requested that we include all very serious substantive and serious substantive threats in our sample. There were 12 very serious substantive threats and 39 serious substantive threats in the population, resulting in a total of 51 of the 75 samples selected. The remaining 24 samples were transient level recorded threats. When selecting the remaining samples, consideration was first given to high schools and middle schools.

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

Samples Selected and Tested by School Type and Threat Level				
School Type	Very Serious Substantive	Serious Substantive	Transient	Totals
<i>High School</i>	7	11	8	26
<i>Middle School</i>	3	12	8	23
<i>Elementary School</i>	2	9	3	14
<i>Centers</i>	0	7	5	12
Totals	12	39	24	75

ATTRIBUTES TESTED

BCPS provided the following 48 attributes for testing with references to the Threat Assessment Policy Manual, 2020 BTA Procedures manual, and the BTA Technical Updates from October 2020, as applicable:

Attributes			Policy 2130*	Manual Page Num**
School BTA Roles	1	Did the school principal identify members of a BTA team that includes persons with expertise in counseling, instruction, school administration, and law enforcement?	s III(B)	30, 40
	2	Did the school principal assign school-based staff members to monitor and respond to all incoming reports where safety is of concern?	s III(E)	9
BTA Training	3	Did all school-based administrators and BTA team members attend and complete mandatory district threat assessment trainings?	s III(C)	9
	4	Did all mandatory team members report their completion of mandatory training to their supervisor?	s III(C)	9
	5	Did the BTA team provide annual training and guidance to students, staff, and parents on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting?	s III(D)	9
Student Intake Form	6	Was the Student Risk Intake Form present in EdPlan?	s IV(A)	17, 18, 19
	7	Was the Student Risk Intake Form substantially completed?	s IV(A)	18, 19-20, 45-46
	8	Was the Student Risk Intake Form listed as a finalized document on the EdPlan Documents tab?	s IV(A)	19
	9	Was the Student Risk Intake Form completed by the school-based administrator?	s IV(A)	19, 45
	10	Were the mandatory immediate actions taken and documented if an imminent threat has been identified?	s IV(A)(D)(c); s V(A)(C)(F)(G)	18, 20, 30, 39, 46
Initial Phase/Triage Process	11	Was the Initial Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	s IV(A)	17, 18, 21, 52
	12	Was the Initial Student Interview Form substantially complete?	s IV(A)	18, 52-53
	13	Was the Initial Student Interview completed by the school-based administrator?	s IV(A)	18, 21, 52
	14	Was the Teacher Input Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?	s IV(A)	17, 18, 21, 54
	15	Was the Teacher Input Form substantially complete?	s IV(A)	18, 54-56
Witness Interview(s) (required only if any witnesses were identified)	16	Was the Witness Interview Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?	s IV(A)	17, 18, 21
	17	Was the Witness Interview Form substantially complete?	s IV(A)	18, 50-51
	18	Was the Witness Interview completed by the school-based administrator?	s IV(A)	18, 21
BTA Part 1: Incident Information	19	Was the Behavioral Threat Assessment created in EdPlan?	s IV(A)	17, 18, 23, 32
	20	Was the BTA Part 1 substantially complete?	s IV(A)(D)(c)	23, 32, 47-49
	21	Were the necessary BTA team members mobilized within 24 hours (when school was in session or no later than the end of the first day school was back in session); if no, was a reason for delay documented in EdPlan?	s III(G)	9, 19, 23-24, 32-33
BTA Part 2: Data Collection	22	Was the BTA Part 2 substantially complete?	s IV(A)(D)(c)	18, 24-25, 33-35
	23	If the student previously exhibited behaviors of concern or posed a threat, was the description (narrative) of prior incidents substantially complete?	s IV(A)(D)(c)	25, 35
Clinical Interviews (required for Substantive Threats only)	24	Was the Clinical Parent Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	s IV(A)(c)	17, 18, 33, 38, 57
	25	Was the Clinical Parent Interview substantially complete?	s IV(A)(c)	57-64
	26	Was the Clinical Parent Interview completed by mental health professional?	s IV(A)(c)	33, 57
	27	Was the Clinical Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	s IV(A)(c)	17, 18, 34, 38, 65
	28	Was the Clinical Student Interview substantially complete?	s IV(A)(c)	65-75
	29	Was the Clinical Student Interview completed by a mental health professional?	s IV(A)(c)	34, 65

ATTRIBUTES TESTED – CONTINUED

Attributes			Policy 2130*	Manual Page Num**
BTA Part 3: Analysis, Risk Level, and Student Support Plan	30	Was the BTA Part 3 substantially complete?	s IV(A)(D)(c); s V(A)(F)	26, 36
	31	Was the parent/guardian contacted?	s IV(A)(C)	28, 38
	32	Was the parent/guardian contact documentation (narrative) substantially completed?	s IV(A)	28, 38
	33	Was the BTA finalized in EdPlan?	s IV(A)	17, 25, 30, 35, 40
	34	Was the BTA finalized within 24 hours; if not, was the reason documented?	s IV(A)	23, 47, 49
	35	Was the Signatures page of the BTA uploaded to the BTA in EdPlan?	s IV(A)	31, 41
	36	Was the BTA signed by all team members as required?	s IV(A)	31, 40-41
	37	Did the Principal acknowledge BTA in EdPlan? (within approx. 48 hours)	s IV(A)(B); s V(B)	25, 30, 35, 40
	38	Did the Cadre Director acknowledge BTA in EdPlan?	s IV(A)	30, 40
	39	Was the completed BTA documented in TERMS?	s IV(A)	30, 40
Monitoring Plan (required for Serious/Very Serious Substantive Threats)	40	Was the Monitoring Plan created?	s IV(A)(c)(E)(a); s V(A)	31, 41, 76-77
	41	Was the Monitoring Plan finalized in EdPlan?	s IV(A)(c)	41
	42	Was the Monitoring Plan finalized within 72 hours of completing BTA parts 1-3?	s IV(A)(c)	41
	43	Was the Signatures page of the Monitoring Plan uploaded to the BTA in EdPlan?	s IV(A)(c)	41
	44	Was the Monitoring Plan signed by all monitoring plan meeting participants?	s IV(A)(c)	41
	45	Was the Monitoring Plan reviewed/modified by all team members every 30 school days (or earlier if warranted)	s IV(A)(c)(E)(b)	41
	46	Was the Monitoring Plan documentation maintained for all actions selected on the monitoring plan, when applicable.	s IV(A)(c)(E)(b)	41, 76
Transferred Students: Continuation of Intervention Services	47	Did the administrator at the receiving school of a transfer student, within the district, review the BTA file in EdPlan within 72 hours?		
	48	If notification of the student's transfer to an out-of-district school was received, did the BTA team confirm that intervention services remain available, as applicable, until the BTA team of the receiving school independently determines the need for intervention services?	s V(E)(a)(b)	Per Board Members Request

*SBBC Policy 2130, Behavioral Threat Assessment (BTA) as adopted 3/5/2019, revised 10/20/2020

**BTA Procedures Manual 2020 Revision 12/17/2020 (Revision 2/16/2021 only corrected typing errors)

POLICY REFERENCES

The table below shows the policy section references that were tested and mentioned throughout the report. Sections 3A, 4E, 5A, 5C, 5D, 5E, 5F, 5G were not auditable because those sections were goals, statements, and objectives that are general in nature and are not subject to audit procedures.

Section	Brief Description *	Audited?
3A	The Chief of Safety & Security Officer (Chief) shall ensure compliance with the policy.	Not Auditable
3B	Each school principal shall identify members of a threat assessment team.	Yes
3C	All school-based administrations and threat assessment members must attend and complete mandatory district threat assessment trainings annually.	Yes
3D	The team must provide annual training and guidance to students, staff, and parents on recognizing behaviors and various options of reporting.	Yes
3E	Each school principal must assign school-based staff members who can proactively monitor and respond to incoming reports.	Yes
3F	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.	Yes
3G	The team must respond to any threat within 24 hours when school is in session or refer the threat to law enforcement if school is not in session. After, the threat assessment team must meet no later than the end of day the first day school is back in session to conclude if the threat is closed.	Yes
4A	The team must identify whether the threat has been made and whether it is a threat to self or a threat to others. The team must coordinate how to monitor the threat. The team shall follow guidelines for evaluation and treatment.	Yes
4B	Upon a determination by the BTA team members that a student poses a threat, all threat determinations must be reported to the school principal or his/her administrative designee.	Yes
4C	Upon a determination by the BTA team members that a student poses a threat, the principal or his/her designee, who is participating in the BTA, shall immediately attempt to notify the student's parent or legal guardian.	Yes
4D	Upon a determination by the BTA team members that a student poses a threat, authorized members of the BTA team may request and obtain criminal history record information, in addition to consulting with law enforcement.	Yes
4E	The BTA team must coordinate resources to provide intervention to individuals whose behavior may pose a threat. The BTA team must plan for the implementation and monitoring of appropriate interventions.	Not Auditable
5A	BTA teams shall follow established procedures for school-based community, and/or health care providers for mental health services.	Not Auditable
5B	The school principal will review the documentation for all threat assessments to ensure completeness and fidelity. The school principal will sign/acknowledge that the BTA documentation is complete and will forward the signed/acknowledged assessment to their supervisor.	Yes
5C	If an immediate mental health or substance abuse crisis is suspected, school personnel must follow policies to engage behavioral health crisis resources who have been trained in crisis intervention.	Not Auditable

POLICY REFERENCES – CONTINUED

Section	Brief Description *	Audited?
5D	The BTA team shall identify additional members of the school community to whom threatening behavior should be reported and provide guidance.	Not Auditable
5E	BTA records are considered education records and shall be maintained and released in accordance with FERPA and state statute.	Not Auditable
5F	If a student may be expelled or suspended, the school shall identify ways in which these can be safely enacted and identify resources to assist.	Not Auditable
5G	Nothing in this policy shall preclude school personnel from acting immediately to address an imminent threat and to report to the school principal, or his/her designee, that an individual poses a threat of violence or physical harm to self or others. Where an immediate threat to life or safety exists, reports must result in immediate notification to law enforcement.	Not Auditable
5H	The Chief Auditor will conduct annual audits in compliance with the policy and report findings to the Audit Committee and The School Board.	Yes

*SBBC Policy 2130, Behavioral Threat Assessment (BTA) as adopted 3/5/2019, revised 10/20/2020

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE

Observation	1. SCHOOL BTA ROLES
Low	<p>Per the Threat Assessment Policy Section 3B & 3E, each school principal shall identify members of the BTA team that includes persons with expertise in counseling, instruction/teaching, school administration, and law enforcement. Each school principal must assign school-based staff members who can proactively monitor and respond to all incoming reports where safety is of concern. Members will be trained on the roles and responsibilities of each team member. The BTA team members can be found on the 2020-2021 School Profile Forms.</p> <p>For 10% (5 schools) of the 50 schools tested, the school principal did not identify persons with expertise in counseling, instruction/teaching, school administration, and law enforcement, as required by attributes #1 and #2 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by school type are as follows:</p> <ul style="list-style-type: none"> • 1 High School – All required persons were identified on the School Profile Form with the exception of the teacher • 2 Middle Schools– All required persons were identified on the School Profile Form with the exception of the teacher • 1 Elementary School– All required persons were identified on the School Profile Form with the exception of the teacher • 1 Center – No School Profile Form was provided, therefore, we were unable to determine if the school had properly identified the required persons
RSM Recommendation(s)	We recommend following the BTA policy & procedures manual, without exception.
District Staff Response	Schools are required to identify the core Behavioral Threat Assessment (BTA) team on the School Profile form in EdPlan. These are required fields that must be completed prior to finalizing the form. School profile forms are to be completed by September 15th of every year. Moving forward, a report will be developed for Cadre Directors/OSPA to identify any missing core team members from the school sites.
Estimated Completion Date	August 2022

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	2. BTA TRAINING
High	<p>Per the Threat Assessment Policy Section 3C & 3D, all school-based administrators and BTA team members must attend and complete mandatory district threat assessment trainings and report their completion to their supervisor. The BTA team must also provide annual training and guidance to students, staff, and parents on recognizing behaviors of concern and the various options for submitting a report.</p> <p>For 28% (101 samples) of the 355 employees listed as BTA/Administration team members, no documented evidence was available to demonstrate completion of the mandatory training, as required by attributes #3 and #4 in the 'Attributes Tested' section of this report.</p>
RSM Recommendation(s)	<p>We recommend that the District monitor training completion and follow up with those that do not complete the training.</p> <p>We recommend following the BTA policies & procedures manual, without exception.</p>
District Staff Response	<p>The district's current electronic professional development system Learning Across Broward (LAB), requires a survey for course completion. A review of the data revealed that one of the employees identified as "not completed" had completed the course. Additionally, 4 individuals who were flagged as "not completed" attended the training. However, they just did not complete the follow-up activity to earn the course credit in LAB.</p> <p>Beginning the 2021-2022 school year, teams were asked to upload their training certificates to EdPlan on the school profile form. A certificate is required for each team member listed on the School Profile Form. Additionally, the District has approved a contract with Navigate 360 to comply with new statutory requirements for state-approved training. This will also offer a more flexible training platform for school-based teams and more immediate training offerings. Navigate 360 will also provide the district with weekly progress reports on training completion, to assist with verifying the core teams' training participation. All core team members will be trained on the State required CSTAG model prior to June 30, 2022.</p>
Estimated Completion Date	June 30, 2022

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	3. STUDENT RISK INTAKE FORM
Low	<p>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).</p> <p>3% (2 samples) of the 75 samples selected had a student risk intake form, however, the intake form was not completed by a school-based administrator, as required by attribute #9 in the '<i>Attributes Tested</i>' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> 1 sample was a very serious substantive level threat (1 Center); student risk intake form was completed by a mental health professional, not a school-based administrator, as required. 1 sample was a serious substantive level threats (1 Center); student risk intake form was completed by a mental health professional, not a school-based administrator, as required.
RSM Recommendation(s)	We recommend following the BTA procedures manual, without exception.
District Staff Response	Mental Health professionals are recommended to assist with these interviews. The procedural manual clearly indicates that the student interview is to be conducted by an administrator. An administrator must be present to conduct the interview as they are the team leader for BTA. In some cases, when a Threat to Self is reported the Intake Form is initiated by a Mental Health Professional.
Estimated Completion Date	August 2021

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	4. INITIAL PHASE / TRIAGE PROCESS - INITIAL STUDENT INTERVIEW AND TEACHER INPUT FORMS
<p>Low</p>	<p>The initial student interviews and teacher input forms are conducted during the initial phase / triage 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 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.</p> <p><u>Initial Student Interview:</u></p> <p>1% (1 sample) of the 75 samples selected, was missing an initial student interview in EdPlan, as required by attribute #11 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> 1 sample was a very serious substantive level threat (<i>1 Elementary School</i>); the initial student interview was not found in EdPlan as required, however, it was provided by the school upon request. <p>4% (3 samples) of the 75 samples where the initial student interview was completed, were not completed by a school-based administrator, as required by attribute #13 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> 1 sample was a very serious substantive level threat (<i>1 Elementary School</i>); unable to determine if the Initial Student Interview was completed by a school-based administrator, as the interview did not contain the name of the individual conducting the interview. 1 sample was a serious substantive level threat (<i>1 High School</i>); interview was completed by a mental health professional, not a school-based administrator, as required. 1 sample was a transient level threat (<i>1 Middle School</i>); interview completed by a police officer, not a school-based administrator, as required. <p><u>Teacher Input Form:</u></p> <p>3% (2 samples) of the 75 samples selected, were missing a teacher input form in EdPlan, as required by attribute #14 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> 1 sample was a very serious substantive level threat (<i>1 Elementary School</i>); the teacher input form was not found in EdPlan as required, however, it was provided by the school upon request. 1 sample was a transient level threat (<i>1 High School</i>); the teacher input form was not found in EdPlan as required, however, it was provided by the school upon request.
<p>RSM Recommendation(s)</p>	<p>We recommend following the BTA procedures manual, without exception. Further, we recommend uploading all external documents to EdPlan so all the documents are housed within the same system.</p>

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	4. INITIAL PHASE / TRIAGE PROCESS - INITIAL STUDENT INTERVIEW AND TEACHER INPUT FORMS - CONTINUED
District Staff Response	<p>EdPlan is developed to require mandatory action steps such as initial student interview, teacher input forms, and clinical interviews.</p> <p>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 (p. 23 – 24).</p> <p>A proposed revision to Policy 2130 includes language to clarify that the BTA must be initiated, not finalized, within 24 hours. In line with the guidance provided in the Comprehensive School Threat Assessment Guidelines (CSTAG): Intervention and Support to Prevent Violence manual, there may be circumstances that prevent the team from being able to conduct interviews right away (student Baker Act/arrest or parent's availability) and may require additional days to complete. Teams are directed to gather information that is immediately available (review student records, interview witnesses) and decide on a reasonable, provisional, course of action that emphasizes the safety of anyone targeted by the threat. The team will then conduct interviews at the first available opportunity to complete the threat assessment.</p> <p>Schools are required to document the reason for the delay in completion of a threat assessment in the Contacts Tab in EdPlan.</p>
Estimated Completion Date	<p>May 18, 2022</p>

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	5. WITNESS INTERVIEW
<p>Low</p>	<p>A witness interview, if witnesses were identified in the gathering of information, is required to be completed by a school-based administrator, as stated in the BTA procedures manual. The purpose of the interview is to gather information on the threat(s) or behavior from potential witnesses or victims.</p> <p>37% (15 samples) of the 41 samples whose BTA identified a witness, were missing a witness interview in EdPlan, as required by attribute #16 in the 'Attributes Tested' section of this report. Please note, out of the 15 samples, 12 had witness interviews, however, were not uploaded to EdPlan, as required.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 3 samples were very serious substantive level threats (2 <i>Elementary Schools</i>, 1 <i>Center</i>); witness interviews were not uploaded to EdPlan, as required, however, all 3 witness interviews were provided by the schools upon request. • 7 samples were serious substantive level threats (1 <i>High School</i>, 1 <i>Middle School</i>, 1 <i>Elementary School</i>, 4 <i>Centers</i>); of the 7 missing witness interviews in EdPlan, 4 witness interviews were provided by the schools upon request and 3 were not completed. • 5 samples were transient level threats (3 <i>High Schools</i>, 1 <i>Middle School</i>, 1 <i>Center</i>); witness interviews were not uploaded to EdPlan, as required, however, all 5 witness interviews were provided by the schools upon request. <p>3% (1 sample) of the 38 samples where the witness interview was present, however, was not substantially complete, as required by attribute #17 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 1 sample was a serious substantive level threat (1 <i>Center</i>)
<p>RSM Recommendation(s)</p>	<p>We recommend following the BTA procedures manual, without exception. Further, we recommend uploading all external documents to EdPlan, so all the documents are housed within the same system.</p>
<p>District Staff Response</p>	<p>The manual has been revised to require the use of the Witness Interview Form within EdPlan when there is a witness involved in a report of a threat beginning April 2022.</p>
<p>Estimated Completion Date</p>	<p>April 2022</p>

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	6. CLINICAL INTERVIEWS
High	<p>For all serious substantive level and very serious substantive level threats, it is mandatory that a clinical parent and clinical student interview be conducted by a mental health professional.</p> <p><u>Clinical Student Interview - Mental Health Professional</u></p> <p>2% (1 sample) of the 51 serious substantive level and very serious substantive level samples had clinical student interviews, however, were not conducted by a mental health professional as required by attribute #29 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> 1 sample was a serious substantive level threat (1 <i>Elementary School</i>); clinical student interview was completed by an assistant principal, not a mental health professional, as required.
RSM Recommendation(s)	We recommend following the BTA procedures manual, without exception.
District Staff Response	Clinical interviews are restricted in EdPlan and can only be completed by a Mental Health Professional. The annual refresher trainings and the procedural manual, provide clear guidance that the interview can only be completed by Mental Health Professionals. This was deemed to be a user error. Guidelines for conducting clinical interviews were reviewed with school.
Estimated Completion Date	April 2022

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	7. TIMELINESS, COMPLETENESS, & ACKNOWLEDGEMENT OF THE BEHAVIOR THREAT ASSESSMENT (BTA)
High	<p>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, parent notification, and configuring an appropriate student support plan, or monitoring plan.</p> <p>Per the Threat Assessment Policy Section 3G, 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.</p> <p>Per the BTA Procedures manual, the BTA must be signed by all team members, if the threat is substantive. These individuals include the administrator(s), teacher(s), student resource officer(s)/law enforcement officer(s), and mental health professional(s). If the threat is determined to be transient or unfounded, signatures for the administrator and at least one other school based BTA team member are required.</p> <p>Once the BTA document has been finalized, the school principal must acknowledge the finalized BTA within approximately 48 hours by clicking the Acknowledge Threat Assessment button in Part 3 of the BTA. Once the principal acknowledges the BTA, the Cadre Directors will be emailed an alert to acknowledge.</p> <p>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.</p> <p><u>Parent Notification</u></p> <p>1% (1 sample) of the 74 samples who were minors, there was no documentation that the parent / guardian was contacted, as required by attribute #31 in the '<i>Attributes Tested</i>' section of this report. The same threat below therefore did not have a parent/guardian contact documentation (narrative), as required by attribute #32 in the '<i>Attributes Tested</i>' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> 1 sample was a transient level threat (1 <i>Middle School</i>)

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	7. TIMELINESS, COMPLETENESS, & ACKNOWLEDGEMENT OF THE BEHAVIOR THREAT ASSESSMENT (BTA) - CONTINUED
	<p><u>Timeliness – Finalization</u></p> <p>44% (33 samples) of the 75 samples selected, the BTA was not finalized within 24 hours and no reason as to the delay was documented, as required by attribute #34 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 2 samples were very serious substantive level threats (1 Elementary School, 1 Center) • 23 samples were serious substantive level threats (5 High Schools, 5 Middle Schools, 8 Elementary Schools, 5 Centers) • 8 samples were transient level threats (3 High Schools, 3 Middle Schools, 1 Elementary School, 1 Center) <p><u>Completeness</u></p> <p>1% (1 sample) of the 75 samples selected, the BTA was not signed by one or more team members, as required by attribute #36 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 1 sample was a very serious substantive level threat (1 Center) <p><u>Principal Acknowledgement of BTA</u></p> <p>40% (30 samples) of the 75 samples selected, the principal did not acknowledge the BTA in EdPlan within approximately 48 hours, as required by attribute #37 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 5 samples were very serious substantive level threats (1 High School, 1 Elementary School, 3 Centers) • 13 samples were serious substantive level threats (2 High Schools, 3 Middle Schools, 4 Elementary Schools, 4 Centers) • 12 samples were transient level threats (3 High Schools, 4 Middle Schools, 1 Elementary School, 4 Centers) <p>93% (28 samples) of the 30 samples identified above, the principal acknowledged the BTA in EdPlan, however, it was not completed within approximately 48 hours, as required by attribute #37 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 4 samples were very serious substantive level threats (1 Elementary School, 3 Centers) • 13 samples were serious substantive level threats (2 High Schools, 3 Middle Schools, 4 Elementary School, 4 Centers) • 11 samples were transient level threats (3 High Schools, 4 Middle Schools, 4 Centers)

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	7. TIMELINESS, COMPLETENESS, & ACKNOWLEDGEMENT OF THE BEHAVIOR THREAT ASSESSMENT (BTA) – CONTINUED
	<p><u>Cadre Director Acknowledgement of BTA</u></p> <p>20% (15 samples) of the 75 samples selected, the Cadre Director did not acknowledge the BTA in EdPlan, as required by attribute #38 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 2 samples were very serious substantive level threats (1 High School, 1 Center) • 5 samples were serious substantive level threats (5 Middle Schools) • 8 samples were transient level threats (8 Middle Schools)
RSM Recommendation(s)	We recommend following the BTA procedures manual, without exception.
District Staff Response	<p><u>Parent Notification</u></p> <p>In EdPlan the parent notification section is required for all BTAs. The BTA cannot be finalized without this section being completed. This was an administrator error. Management will provide training to the administrator.</p> <p><u>Timeliness – Finalization</u></p> <p>Currently Behavior Threat Assessments must be initiated within 24 hours of notification to administration of a threat. Schools were unable to complete threat assessments within 24 hours as required information was still being collected and unable to be obtained within the 24-hour period. Schools document in the Contact Tab in Ed Plan when contact is being attempted and not able to be completed. All identified Behavior Threat Assessments were finalized once all required processes were completed. As of August 2021, weekly reports are provided to OSPA Care Directors which contain information on when threat assessments are initiated and status of completion. The results of this observation may have been the result of extenuating circumstances such as student incarceration or unavailability due to involuntary hospitalization of a student or possible unavailability of parents or other factors.</p> <p>A proposed revision to Policy 2130 includes language to clarify that the BTA must be initiated, not finalized, within 24 hours. In line with the guidance provided in the Comprehensive School Threat Assessment Guidelines (CSTAG): Intervention and Support to Prevent Violence manual, there may be circumstances that prevent the team from being able to conduct interviews right away (student Baker Act/arrest or parent's availability) and may require additional days to complete. Teams are directed to gather information that is immediately available (review student records, interview witnesses) and decide on a reasonable, provisional, course of action that emphasizes the safety of anyone targeted by the threat. The team will then conduct interviews at the first available opportunity to complete the threat assessment.</p>

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	7. TIMELINESS, COMPLETENESS, & ACKNOWLEDGEMENT OF THE BEHAVIOR THREAT ASSESSMENT (BTA) – CONTINUED
	<p><u>Completeness</u> BTA training and annual refresher courses include a review of all mandatory components including required signatures of all BTA team participants. Electronic signatures were added to EdPlan in December 2021. Cadre Directors monitor completion of signatures.</p> <p><u>Principal Acknowledgement of BTA</u> Currently, OSPA Cadre Directors receive a weekly report on principal acknowledgements and follow up with principals when a threat needs a principal acknowledgement. There were various reasons why principals took longer than 48 hours to acknowledge a threat assessment. Principals waited to acknowledge until all signature pages were obtained, student withdrew or transferred to another school, additional information was provided, technical issues, etc. Principals were not required to provide a rationale for why a Behavioral Threat Assessment was not acknowledged within 48 hours.</p> <p><u>Cadre Director Acknowledgement of BTA</u> During this audit period, Middle school cadre directors were reviewing threat assessments for principal acknowledgement and following up with principals. Middle School Cadre Directors were using the prior process for reviewing threats prior to Level 2 Acknowledgement button being added the week schools closed due to Covid-19.</p> <p>Currently, a weekly report is reviewed with OSPA Directors to ensure Cadre Director Acknowledgements are completed within current guidelines.</p> <p>Currently all directors are using the Level 2 Acknowledgement button to verify review of principal acknowledgement.</p>
<p>Estimated Completion Date</p>	<p>Parent Notification – April 2022 Timeliness - Finalization – May 18, 2022 Completeness – December 2021 Principal Acknowledgement of BTA – April 2022 Cadre Director Acknowledgement of BTA – March 2022</p>

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	8. MONITORING PLAN
High	<p>For every serious substantive level and very serious substantive 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, student required to be escorted to classes, etc.), and determines who is responsible to conduct the monitoring of the student. The monitoring plan must be finalized no later than 72 hours after the finalization of the BTA. The monitoring plan must be signed by all participants, or documentation must be included that they participated via telephone, etc. and were unable to sign. The BTA team must reconvene, at least every 30 days, from the development of the initial monitoring plan, for review and modification(s).</p> <p><u>Finalization (Monitoring Plan Finalization)</u></p> <p>22% (11 samples) of the of the 51 serious substantive level and very serious substantive level threat samples that created a monitoring plan, were not finalized in the EdPlan system, as required by attribute #41 in the '<i>Attributes Tested</i>' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 4 samples were very serious substantive level threats (1 High School, 1 Elementary School, 2 Centers) • 7 samples were serious substantive level threats (1 High School, 3 Middle Schools, 2 Elementary Schools, 1 Center) <p><u>Timeliness (Monitoring Plan Completed)</u></p> <p>38% (15 samples) of the 40 serious substantive level and very serious substantive level threat samples that had a monitoring plan finalized, were not finalized in the EdPlan system with 72 hours, as required by attribute #42 in the '<i>Attributes Tested</i>' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 3 samples were very serious substantive level threats (1 Elementary School, 2 Centers) • 12 samples were serious substantive level threats (2 High Schools, 2 Middle Schools, 2 Elementary Schools, 6 Centers)

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

Observation	8. MONITORING PLAN - CONTINUED
	<p><u>Completeness (Missing Signatures of Monitoring Plan)</u></p> <p>63% (25 samples) of the 40 serious substantive level and very serious substantive level threat samples that had an uploaded signature page included with the finalized monitoring plan, were missing the signatures of the monitoring plan participants, as required by attribute #44 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 6 samples were very serious substantive level threats (1 High School, 1 Elementary School, 4 Centers) • 19 samples were serious substantive level threats (3 High Schools, 3 Middle Schools, 7 Elementary Schools, 6 Centers) <p><u>Timeliness & Completeness (Review of Monitoring Plan)</u></p> <p>25% (10 samples) of the 40 serious substantive level and very serious substantive level samples that had a finalized monitoring plan, were not reviewed within the 30 days by the BTA team members, as required by attribute #45 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 1 sample was a very serious substantive level threat (1 Center) • 9 samples were serious substantive level threats (2 High Schools, 1 Middle School, 1 Elementary School, 5 Centers) <p><u>Monitoring Plan Action Items</u></p> <p>4% (2 samples) of the 51 serious substantive level and very serious substantive level samples that created a monitoring plan, the documentation or action items selected on the monitoring plans were not maintained or followed, as required by attribute #46 in the 'Attributes Tested' section of this report.</p> <p>A breakdown of the findings by threat level and school type are as follows:</p> <ul style="list-style-type: none"> • 2 samples were serious substantive level threats (1 Middle School, 1 Elementary School)
RSM Recommendation(s)	We recommend following the BTA procedures manual, without exception.

DETAILED OBSERVATIONS AND RELATED DISTRICT STAFF RESPONSE – CONTINUED

	8. MONITORING PLAN - CONTINUED
District Staff Response	<p><u>Completeness</u> Currently EdPlan opens a monitoring plan in the system when a substantive threat is entered into the system. Schools are required to complete a monitoring plan for all substantive threats. In addition, EdPlan will automatically open a monitoring plan for Transient and Not a Threat levels should the BTA team choose actions for the student that would require monitoring. Follow up was conducted by the Office of School Performance and Accountability to ensure monitoring plans existed or are currently in place, if applicable for the Behavior Threat Assessments that were identified as needing a monitoring plan and one did not exist.</p> <p><u>Timeliness (Monitoring Plan Completed)</u> Cadre Directors check monitoring plan status in EdPlan for completion. Cadre Directors follow up with principals to ensure open Monitoring Plans are finalized.</p> <p><u>Completeness (Missing Signatures of Monitoring Plans)</u> Cadre Directors check signature pages of Monitoring Plan in EdPlan for completion. Cadre Directors follow up with principals to ensure all signatures are documented on the Signature Page. Electronic signatures were added to EdPlan in December 2021. Cadre Directors monitor completion of signatures.</p> <p><u>Timeliness and Completeness (Review of Monitoring Plans)</u> Cadre Directors review the status of active Monitoring Plans in EdPlan to ensure the plans are updated within 30 days. Cadre Directors follow up with principals to ensure compliance of timely updating of active Monitoring Plans.</p>
Estimated Completion Date	April 2022

ADDITIONAL CONSIDERATIONS

	OVERALL PROCESS IMPROVEMENTS
	<p><u><i>File Name and Locations</i></u></p> <p>Naming conventions and instructions for file organization ensures users know how to name the uploaded documents so that file names are consistent and contain all the correct information, which also helps store and organize the files. Without them, the student's threat record would be very difficult to find the forms when access is needed.</p> <p>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. Further, when items were not found in the EdPlan system, the schools were contacted directly for the missing items. When contacted, the schools were able to provide most of the requested documents.</p> <p><u><i>Automated Signature and Date</i></u></p> <p>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.</p> <p>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.</p> <p><u><i>Centralized BTA Department</i></u></p> <p>Currently, there are five (5) different district departments involved in the behavioral threat assessment process: Office of Academics – ESLS Division, Office of School Performance & Accountability, School Safety, Security, and Emergency Preparedness, and Student Support Initiatives and Recovery, and the Chief Auditor's Office.</p>
RSM Recommendation(s)	<p>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 uploading all external documents to the EdPlan system.</p> <p>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.</p> <p>The District could consider a centralized location / department to solely focus on the behavioral threat assessment process to determine if all threats are being monitored effectively, as required by the BTA policy and procedures manual.</p>

ADDITIONAL CONSIDERATIONS - CONTINUED

	OVERALL PROCESS IMPROVEMENTS - CONTINUED
	<p>In support of this recommendation, which was also recommended by the District’s Safety Task Force, we feel that it is imperative for the district to consider creating a dedicated department/team that does not have other job responsibilities to provide better support to schools and a higher level of service to the community. The district-level team should ensure that procedures are maintained for effective information sharing between the school district, community mental health and law enforcement agencies; evaluate the effectiveness of the threat assessment process throughout the school district; and recommend changes to policies and procedures to maintain an effective threat assessment process. This team should have ties to the communication of threats received via anonymous reporting mechanisms and/or through law enforcement communications. They should also be responsible for responding to requests for data from the FLDOE’s Office of Safe Schools or as a part of the district’s annual audit.</p> <p>If created, this department will be able to conduct more frequent monitoring and training to target the attributes that have been identified as needing improvement on each audit report. Due to the importance of the work and its impact on school safety, this team needs to be dedicated to these tasks year-round. Additionally, due to the increased demands set forth and the frequent changes to the statutory/FLDOE’s requirements, this department’s sole focus and mandate should be on the many layers needed to ensure fidelity of the district’s threat assessment process.</p>

APPENDIX I: SUMMARY

There are 48 attributes that were tested within the 75 threats sampled. Our sample was not intended to be representative of the population; rather, our sample was selected with a specific focus on the transient, serious substantive and very serious substantive 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 and school type.

<i>By Risk Level</i>	<ul style="list-style-type: none"> • Transient: Exceptions were noted for eighteen (18), or 75%, of the twenty-four (24) transient risk threats tested. The remaining six (6) transient risk threats, or 25% tested had no exceptions. • Serious Substantive: Exceptions were noted for thirty-seven (37), or 95%, of the thirty-nine (39) serious substantive threats tested. The remaining two (2) serious substantive risk threats, or 5% tested had no exceptions. • Very Serious Substantive: Exceptions were noted for twelve (12), or 100%, of the twelve (12) very serious substantive risk threats tested.
<i>By Type of School</i>	<ul style="list-style-type: none"> • Centers: Exceptions were noted for twenty-two (22), or 96%, of the twenty-three (23) threats tested. One (1) Center School, or 4% tested had no exceptions. • Elementary Schools: Exceptions were noted for fifteen (15), or 83%, of the eighteen (18) threats tested. Three (3) Elementary Schools, or 17% tested had no exceptions. • Middle Schools: Exceptions were noted for fifteen (15), or 100%, of the fifteen (15) threats tested. • High Schools: Exceptions were noted for fifteen (15), or 79%, of the nineteen (19) threats tested. Four (4) High Schools, or 21% tested had no exceptions.

APPENDIX II: 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

APPENDIX II: BTA PROCESS TIMELINE – CONTINUED

Spring 2020

- Retraining of all school-based administrators 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 administrators 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 58-132E Agreement for Electronic Management System, Amendment No. 3
- 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
- Updated the BTA Policy Manual 2130, revised 10/20/2020 & the BTA Procedures Manual, revised 12/17/2020

Winter/Spring 2021

- Updated the BTA Procedures Manual, revised 2/16/21
- Selection and approval of contract for BTA services
- BTA Trainings offered throughout Spring 2021
- BTA Annual Updates & Review Courses released via Canvas

Summer 2021

- Trainings commenced for all BCPS school-based administrators
- Deployment of enhanced BTA and SRA modules per PCG contract approved by SBBC in May 2021 and funded in June 2022

Fall 2021

- BTA Trainings conducted monthly from Fall to Spring of the 2021-2022 school year
- BTA Annual Updates & Review Courses re-released via Canvas in Fall 2021
- FLDOE Rule 6A-1.0018 School Safety Requirements and Monitoring – adopted on 7/14/21 and amended on 11/23/21 provided additional requirements for the completion of state-approved threat assessment training and safety reporting. Please note, this Rule is currently under review and may be amended again with future changes to the threat assessment process.

APPENDIX II: BTA PROCESS TIMELINE – CONTINUED

Winter/Spring 2022

- District approved the Navigate 360 contract for the provision of future trainings. This will also offer a more flexible training platform for school-based teams and more immediate training offerings.
- Proposed revisions to the BTA Policy were presented to the School Board on February 22, 2022. The proposed revisions are to add language that clarifies District procedures and includes language for new state requirements.
- Updated the BTA Procedures Manual, revised 3/8/22

APPENDIX III: 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: April 14, 2022

TO: Joris Jabouin, Chief Auditor
Office of the Chief Auditor

FROM: Valerie S. Wanza, Ph.D.
Chief School Performance & Accountability Officer

SUBJECT: RESPONSE TO BEHAVIORAL THREAT ASSESSMENT AUDIT SCHOOL YEAR 2020-21

This correspondence comes as a response to the Behavioral Threat Assessment Audit for the 2020-21 school year. I have had the opportunity to review the comprehensive report and discuss it in great length with my leadership team. The Office of School Performance & Accountability (OSPA) continues to make the Behavior Threat Assessment Process a priority for our division. The findings, recommendations and leadership responses from school years 2019-20 and 2020-21 audits, which were impacted by school closure due to the pandemic, inform our practices 2021-22 school year.

The OSPA Leadership Team regularly participates in weekly collaboration sessions with our colleagues in Academics, Student Support Initiatives & Recovery, Safety & Security and school leaders. Additionally, we complete all training and receive updates on the Behavioral Threat Assessment processes and procedures. This topic continues to be a standing item on our weekly staff meeting agenda. It has been expanded to include a review of the reporting protocols and notification methods to assist school leaders as they guide their respective teams in this area.

My office conducts regular analyses of school-specific behavioral threat assessment procedures and outcomes in schools with staff from Academics and Student Support Initiatives & Recovery. As a result of our findings, we have administered disciplinary actions to school leaders when appropriate and identified areas for system and training improvements. These cross-functional discussions have become beneficial for the schools and central office support teams.

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

VSW:ca

cc: Cabinet Members
OSPA Leadership Team

**NICOLE M. MANCINI, Ed.D., CHIEF ACADEMIC OFFICER (TASK-ASSIGNED)
OFFICE OF ACADEMICS**

April 14, 2022

To: Joris Jabouin, Chief Auditor

From: Dr. Nicole M. Mancini, Chief Academic Officer (Task Assigned)



**RE: STAFF RESPONSE TO RSM COMPLIANCE AUDIT – THREAT ASSESSMENT
PROCEDURES**

Broward County Public Schools (BCPS) places student safety and security as the foundation of its responsibility to students and staff. A safe and secure school is a prerequisite for a positive learning environment. Staff from the Office of Academics, Office of School Performance and Accountability, Student Support Initiatives and Recovery, and the Office of Safety, Security, and Emergency Preparedness collaborate weekly to address the Behavioral Threat Assessment process, the recording system (EdPlan), and new training modules in Navigate360 recently approved by the School Board. These staff members continue to convene to review the RSM audit, implement recommendations, and discuss process improvements. Improvement processes have already been taken and implemented to address the findings from SY20-21. In addition, multiple improvements have been made to the EdPlan System as a result of collaboration and in response to needs identified.

School operations were interrupted on March 13, 2020, due to the impact of the COVID-19 pandemic requiring students to be physically present at home, or a location other than the school building, to receive remote instruction beginning March 30, 2020, and in some cases, through August 2021. The district returned to face-to-face learning on October 9, 2020. Face-to-face learning was encouraged, but families were able to remain remote until August 2021 when BCPS resumed to complete in-building face-to-face instruction. These shifts in learning environments required adjustments to threat reporting, investigations, collaborations, and monitoring to respond to the changed operations of the instructional environment; therefore, some of the sample selections may have been impacted due to the COVID-19 pandemic.

The audit observations and staff responses provided for each of the items in the current report have been carefully reviewed. In addition, it is recommended that the district consider creating a dedicated department with team members that do not have other job responsibilities in order to provide better support to schools and a higher level of service to the community, which was also recommended by the District's School Safety Task

Staff Response to RSM Compliance Audit – Threat Assessment Procedures
April 12, 2022
Page 2

Force. This district-level department should ensure that procedures are maintained for effective information sharing between the school district, community mental health and law enforcement agencies; evaluate the effectiveness of the threat assessment process throughout the school district; and recommend changes to policies and procedures to maintain an effective threat assessment process. The department should have ties to the communication of threats received via anonymous reporting mechanisms and/or through law enforcement communications. They should also be responsible for responding to requests for data from the FLDOE's Office of Safe Schools or as a part of the district's annual audit.

With the creation of this department, the District will be able to conduct more frequent monitoring and training to target the attributes that have been identified as needing improvement on each audit report. The importance of this work, and its impact on school safety, necessitates the individuals are dedicated to these tasks year-round. Due to the increased demands set forth, and frequent changes to the statutory/FLDOE's requirements, this department's sole focus and mandate should be on the many layers needed to ensure fidelity of the district's threat assessment process.

It is our goal to continue to ensure safe teaching and learning environments for our students and staff.

APPENDIX IV: EDPLAN/BTA MODULAR UPDATE

BCPS provided the EdPlan system and BTA modular updates from October 2019 to December 2021 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

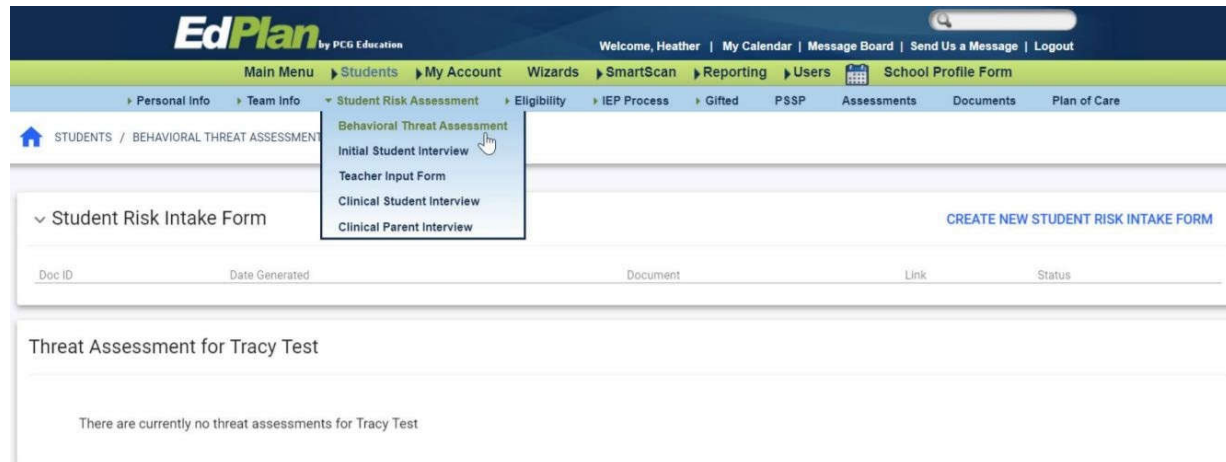
Threat Assessment FI Updates

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

APPENDIX IV: 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

View Previous Documents

Doc ID	Document Name	Created By	Date Created	
14987852	Behavioral Threat Assessment	Pranitha Yerra	11/07/2019	VIEW BATCH

APPENDIX IV: 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 STAAAnalysisCategories 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

APPENDIX IV: 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 user type-level permission in addition to the current user level permission.
8. Alerts:
 - a. Update alerts for the option to send only to those users of a given user type 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 STAAanalysisQuestions 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

APPENDIX IV: EDPLAN/BTA MODULAR UPDATE – CONTINUED

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.
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 pre-filled 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 ~~final~~ 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

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.

APPENDIX IV: EDPLAN/BTA MODULAR UPDATE – CONTINUED

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**

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:

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

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.

Suicide Risk Assessment Part 1

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

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

Moved the **Initial Screener** questions to Part 2

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

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.

APPENDIX IV: EDPLAN/BTA MODULAR UPDATE – CONTINUED

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.

March 2021 Features

Required Meeting Participants by Risk Level: Update to allow for required participants on a BTA or SRA to change depending on risk level.

June 2021 Features

Teams Page Update: changes made to BTA/SRA team page to remove the case manager field (unused) and allow for label changes to BTA and SRA teams.

Safety Plan: Addressed an issue where the Safety plan was looking like a monitoring plan upon completing a plan review.

August 2021 Features

School Profile Form update: document update to include the school year in which the document was created within.

December 2021 Features

SRA Process Updates: update the SRA process to incorporate both the student screening and student interview in the second part of the SRA process.

Electronic Signature for BTA/SRA: new feature to allow for electronic signing of BTA and SRA documents and Monitoring/Safety Plans.

APPENDIX V: BTA POLICY MANUAL

BEHAVIORAL THREAT ASSESSMENT (BTA)

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

SECTION I: DEFINITIONS

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

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

SECTION II: PURPOSE

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

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

SECTION III: DISTRICT/SCHOOL ROLES AND RESPONSIBILITIES

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

SECTION IV: BTA TEAM RESPONSES

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

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

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

SECTION V: FOLLOW-UP AND INTERVENTIONS

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

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

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

Policy Custodian: Office of Academics

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

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

APPENDIX VI: 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 *Behavioral Threat Assessment Policy* (SBBC 2130). Each of these highlighted the importance of ensuring fidelity to high-quality threat assessment procedures through accountability and on-going professional development.

Broward Schools has had a mandated set of procedures for violence prevention and threat assessment. The district's approach to violence prevention and threat assessment was initiated in 2002, with the writing of the first edition of the *Threat Assessment Procedures Manual*. Since this first edition, the manual was revised regularly (2008, 2012, 2017). The district's approach to violence prevention contained three components. The first two components were comprised of a *Warning Signs* presentation and the *Silence Hurts: Safe Zone Listeners* campaign to help prevent violence in the schools by catching problems early through identifying students who may be at-risk for violent behavior. These violence prevention efforts helped create a system which could receive, record, and disseminate information from students about suspected threats in schools. As the third component of the district's approach, the Threat Assessment Process was designed as a three-stage process. This process historically included an initial response to threats, screening steps to assist in determining threat level, and in-depth 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 multi-departmental programs, initiatives, and campaigns which promote social-emotional competence as well as psychological and physical safety in schools. These include *Sandy Hook Promise*, *social-emotional learning (SEL)*, *Bullying Prevention*, *Silence Hurts*, and *Warning Signs: Safe Zone Listeners*. The 2020 revision of the district's behavioral threat assessment procedures incorporates the most updated recommendations from the Florida Department of Education's Office of Safe Schools, and national leaders in threat assessment, such as the Federal Bureau of Investigation (FBI), the U.S. Secret Service, the Virginia Department of Criminal Justice Services (DCJS). Finally, the need for increased accountability has provided the impetus for developing an electronic database for the documentation and monitoring of threat assessments across the district, a new component of the district's process. With the goal of maintaining safe and secure schools, the *Behavioral Threat Assessment (BTA) Procedures Manual 2020 Revision* will outline and provide guidance to school and district staff on the most current threat assessment policies and procedures for Broward County Public Schools, Florida.

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

Behavioral Threat Assessment Policy (*SBBC 2130*) ([8](#)) was written in accordance with state legislation ([9, 10](#)) , established research, and recognized standards of practice regarding threat assessment and management in school settings. The policy also provides guidance and important definitions to establish consistency and common language among district BTA team members.

Definitions

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

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

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

Key Highlights

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

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

CHAPTER 2: THREAT ASSESSMENT BEST PRACTICES AND CONSIDERATIONS

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

Pathways to Violence

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

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

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

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

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

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

Risk Factors and Warning Behaviors

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

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

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

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

Mitigators

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

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

Best Practices in Threat Assessment

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

Barriers to Engagement

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

Research-Based Recommendations

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

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

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

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

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

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

Considerations for Determination of Risk Level

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

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

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

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

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

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

Considerations for People with Disabilities

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

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

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

Below are some basic tips to follow (11):

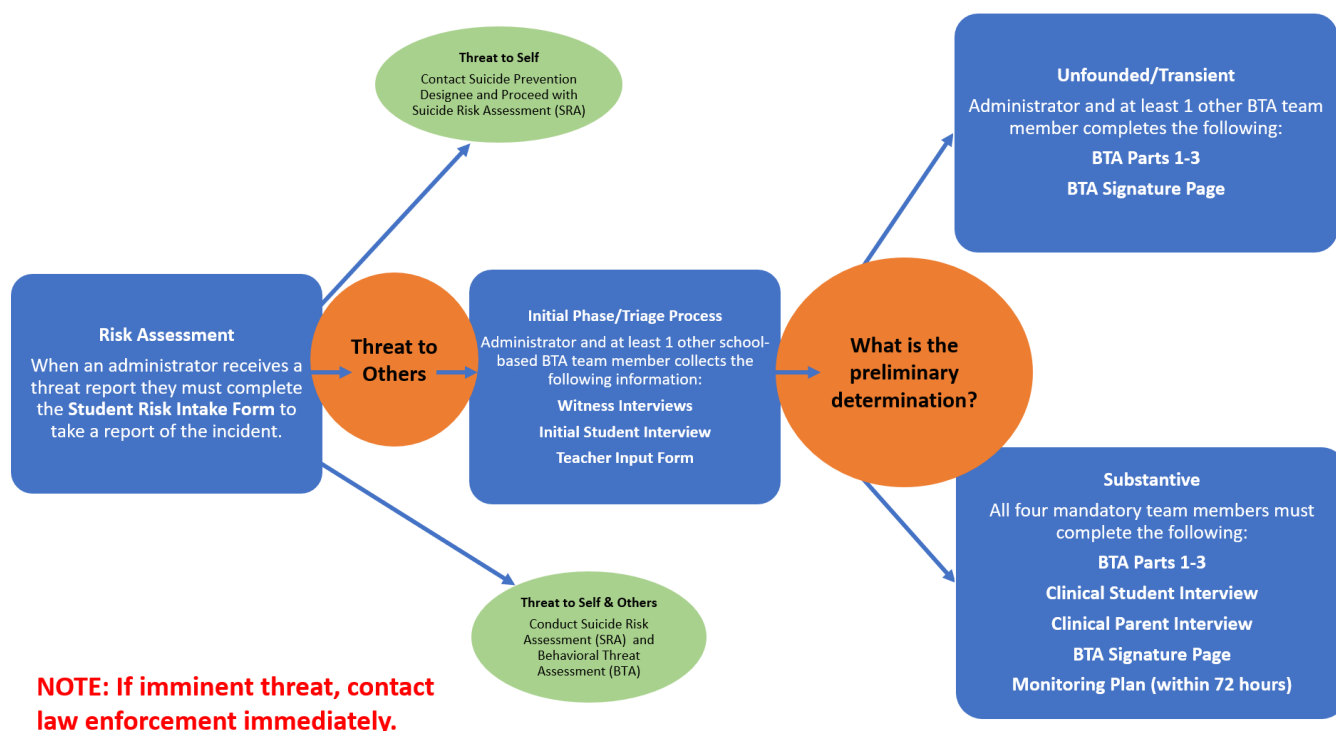
- Utilize adults who are familiar with the student's unique needs and levels of functioning.
- Stress, particularly for people with mental illness, can affect the person's ability to function. In a crisis, stay calm, supportive, and ask the person what will make them feel most comfortable.

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

CHAPTER 3: BEHAVIORAL THREAT ASSESSMENT (BTA) PROCEDURES

Overview of BTA Procedures

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



A completed BTA includes the following documents listed as final within the EdPlan Documents tab:

- ✓ [Student Risk Intake Form](#)
- ✓ [Initial Student Interview](#)
- ✓ [Teacher Input Form](#)
- ✓ [Witness Interview\(s\)](#) (as applicable)
- ✓ Behavioral Threat Assessment (BTA Part 1, Part 2, Part 3), including Signature Page

- ✓ [Clinical Student Interview](#) *
- ✓ [Clinical Parent Interview](#) *
- ✓ [Monitoring Plan](#) **

**Required for Substantive threats; as needed for Unfounded/Transient threats.*

BTA PROCESS AT-A-GLANCE

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

RISK ASSESSMENT

- ☐ Complete the **Student Risk Intake Form** for threats to self and/or others:
 - ☐ If the individual poses a threat of harm to others, follow BTA procedures below.
 - ☐ If the individual poses a threat of harm to self, refer to the Suicide Prevention Designee for the Suicide Risk Assessment (SRA) process.
 - ☐ In either case, take immediate action for imminent threats.

INITIAL PHASE/TRIAGE PROCESS

- ☐ Administrator and at least one other school-based BTA team member will conduct Initial Student Interview, Witness Interview(s), and gather Teacher Input Form(s) to make a preliminary determination if threat level may be unfounded/transient or substantive.
 - ☐ If the preliminary determination suggests that the threat is **unfounded/transient**, an administrator and at least 1 other team member complete the following BTA process for unfounded/transient threats: a) BTA Parts 1-3 and b) Signature Page.
 - ☐ If the preliminary determination suggests that the threat is **substantive**, all 4 mandatory team members must participate to complete the following BTA process for substantive threats: a) BTA Parts 1-3, b) Clinical Parent Interview, c) Clinical Student Interview, d) Signature Page, and e) Monitoring Plan.
- ☐ If at any point during the BTA process, data indicates that the threat may be substantive rather than unfounded/transient, all mandatory team members must participate and the BTA process for substantive threats must be followed.

BTA PART 1: INCIDENT INFORMATION

- ☐ **Incident Information:** Specific details about the incident, threat, and/or concern.

BTA PART 2: INTERVIEWS AND SOURCES

- ☐ **Interviews and Sources:** Select all interview forms completed and indicate names of interviewee/interviewer and dates/time. Conduct additional clinical interviews* as needed.
- ☐ **Record Review:** Review relevant records and specify person who reviewed the information.
- ☐ **Attached Sources:** Upload/attach/store all relevant artifacts pertaining to the student's BTA.

BTA PART 3: ANALYSIS, RISK LEVEL, AND STUDENT SUPPORT PLAN

- ☐ **Analysis:** Answer 18 key questions to analyze risk factors, warning behaviors, and mitigating circumstances (consider all information collected in the Initial Phase/Triage process and in BTA Part 1 and Part 2).
- ☐ **Observations Suggesting Need for Intervention:** Use as needed for intervention planning.
- ☐ **Determination of Risk Level:** Determine risk level based on all information collected.
- ☐ **Actions and Student Support Plan (SSP):** Select mandatory and additional action steps.
- ☐ Finalize BTA and upload the signature page.

MONITORING PLAN

- ☐ **Monitoring Plan*:** For on-going monitoring of support/services.

**Required for Substantive threats; as needed for Unfounded/Transient threats.*

Risk Assessment

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

Student Risk Intake Form

Information About the Incident

- ☐ Today's Date
- ☐ Who reported this initial concern?
 - Reporter Name
 - Affiliation to School
 - Contact Number
- ☐ Who was this concern reported to?
 - Name of Individual
 - Affiliation to School
 - Contact Number
- ☐ Date/ Reported
- ☐ Time Reported (if known)
- ☐ Date Administrator Learned of Incident
- ☐ DMS Incident Number (if applicable)
- ☐ Date/Time of Incident
- ☐ Location of Incident

Narrative Details: Write a narrative below detailing the incident, threat to self, threat to others, and/or concerning behavior reported. Please include the location and time of the incident, threat, or concerning behavior. Determine if there are other individuals who witnessed the student engaging in threatening, 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.

Primary Target(s): If a threat to others has been made, has the intended target been identified?

Witness(es): If additional witnesses were identified by the reporter, please list them.

- ☐ Name of Witness
- ☐ What is their position/Affiliation to the school?
- ☐ Contact Number

Incident Type(s) (Check all that apply):

- ☐ **Threat to Others:** If the individual is suspected of posing a **threat of harm to others**, initiate the Triage Process, mobilize the necessary BTA team members, and complete the BTA within 24 hours, starting with Part 1. If imminent threat is suspected, follow [mandatory steps to respond to imminent threats towards others](#).
- ☐ **Threat to Self:** If the individual is suspected of posing a **threat of harm to self**, then ensure the student is medically safe, maintain adult supervision, and contact a Suicide Designee or other mental health

professional to conduct Suicide Risk Assessment (SRA) immediately. If imminent threat, follow [mandatory steps to respond to imminent threats towards self](#). Please note: If it is a threat to self ONLY you DO NOT complete any components of the Behavioral Threat Assessment process. (2).

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

Mandatory Steps to Respond to Imminent Threats

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 to respond to an imminent threat towards others:

- ☐ Utilize law enforcement to contain the threat and consult with the school safety team.
- ☐ Take immediate precautions to protect potential victim(s).
- ☐ Initiate school safety plan procedures (e.g., Code Yellow, Code Red), if warranted.
- ☐ Consult with SRO, as appropriate, to assist in monitoring/supervising the student of concern and determining the need for law enforcement action.
- ☐ Inform Principal or administrative designee of imminent threat. Principal will inform their supervisor.
- ☐ Notify parents of intended victim(s) before they leave school grounds.
- ☐ Notify parent of the person who poses the threat and attempt to enlist their support in preventing that student from carrying out the threat.
- ☐ If the student is on campus and significant mental health concerns are noted, consult with a mental 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.
- ☐ Notification to Law Enforcement: Complete ONLY when notifying law enforcement in cases of imminent threat to others.

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. The following actions are also mandatory to respond to an imminent threat towards self:

- ☐ Ensure the student is medically safe first.
- ☐ Keep the student with an adult to provide supervision.
- ☐ Contact the Suicide Prevention Designee or another mental health professional.
- ☐ Contact the SRO, Local Law Enforcement or the Mobile Response Team (previously Youth Emergency Services Team) at (954) 677-3113.
- ☐ Notify parent of the at-risk student and attempt to enlist their support in creating a safety and support plan.
- ☐ Schools should not contact the legal guardian to take the student off campus whether it is to their home or to a hospital.
- ☐ If a Baker Act Assessment was initiated, document the **name of the Baker Act Assessment Initiator**, the date/time initiated, and the outcome of the Baker Act Assessment if known.

Initial Phase/Triage Process

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

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

☐ *Initial Student Interview* (Required)

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

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

☐ *Teacher Input Form* (Required)

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

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

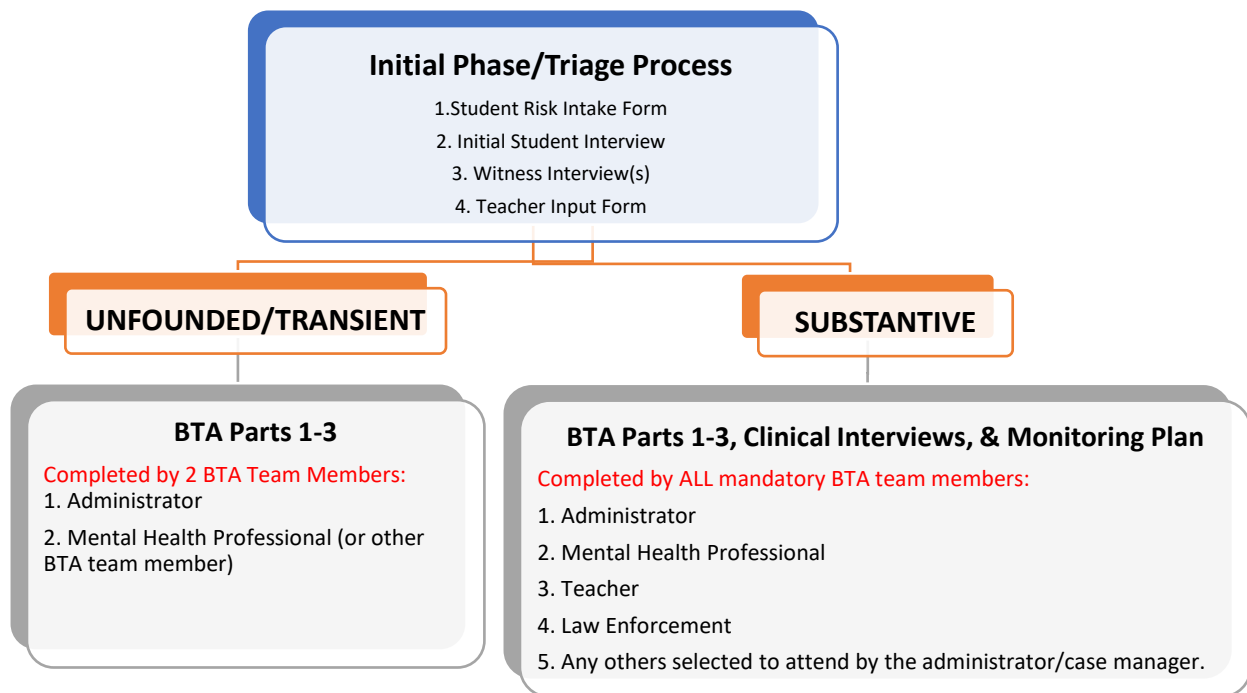
When applicable, Witness Interviews must be completed by a school-based administrator. A mental health professional may also be present during this interview.

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

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

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

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



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

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

BTA Process: **Unfounded/Transient Threat**

In addition to initial information obtained through the [Risk Assessment](#) and [Initial Phase/Triage Process](#), if the preliminary determination suggests that the threat is **unfounded/transient**, an administrator and at least one other school-based BTA team member must complete the following: a) BTA Parts 1-3 and b) BTA Signature Page. Additional personnel with knowledge of the child or circumstances may also serve as members of the team (8).

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

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

BTA Part 1

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

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

- ☐ Information about the Incident
- ☐ Sources
- ☐ Details

Additional required information:

- ☐ What was the **context** of the behavior? What was happening at the time and/or just before?

If imminent threat to others is suspected, then contact law enforcement immediately and follow [mandatory action steps to respond to imminent threat](#).

- ☐ Was law enforcement required to be contacted? Document the name of the law enforcement official contacted, date/time of contact, and outcome of contact. Complete ONLY when notifying law enforcement in cases of imminent threat to others.
- ☐ Mobilize the threat assessment team and complete [all required components of a BTA for substantive threat](#).

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 there are extenuating circumstances that delay access to the student or parent to complete the required interviews, the BTA team would need to convene to complete the other components of the assessment without undue delay (e.g., Teacher Input Form, review of background information, obtaining criminal history, etc.). Please make note of the reason for

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delay on the EDPlan Info>Contacts Tab in EdPlan (e.g., attempts to contact parent/student and why either one was unavailable). Once all required components are completed, the BTA documents must be listed as finalized documents on the EdPlan Documents tab. If school is not in session, and the school principal becomes aware of a threat, he/she shall immediately refer the matter to law enforcement for evaluation, and the threat assessment team must meet **no later than the end of the first day school is back in session** to consider the matter and ensure it is resolved (8).

BTA Part 2

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

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

Interviews and Sources

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

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

Interview Documents

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

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

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

Records Review

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

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

Required:

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

Other, if applicable (i.e., records indicative of [risk factors](#), [warning behaviors](#), or [mitigating factors](#)):

- ☐ Records from Outside Agencies
- ☐ Law Enforcement Records
- ☐ Employment Records
- ☐ Classwork/Homework Assignments
- ☐ Journal/Artwork
- ☐ Social Media
- ☐ Other Relevant Sources of Information (i.e., original written communication of threats, witness statements referenced in [Part 1](#), photos, documents, etc.)

Following a records review, the team must answer the following question:

- ☐ Has the student previously exhibited behaviors of concern or posed a threat?

BTA Part 3

When assessing a potential threat or concerning behavior, the threat assessment team must determine not only whether a threat has been made or communicated, but also if a person poses a danger to self or others or if they are potentially on a [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 does not pose a threat to self or others ([8](#)).

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

The BTA document must be finalized at the end of Part 3 and then acknowledged by the principal and by the cadre directors for accountability. See [Finalize BTA](#) and [Signature Page](#) sections for more information.

Analysis

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

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

- ☐ Threat is Likely to be Less Serious:
 1. Subject admits to threat (statement or behavior).
 2. Subject has explanation for threat as benign (such as a joke or figure of speech).
 3. Subject admits to feeling angry toward target at time of incident.
 4. Subject retracts threat or denies intent to harm.
 5. Subject apologetic or willing to make amends for threat.
 6. Subject willing to resolve threat through conflict resolution or some other means.

- ☐ Threat is Likely to be More Serious:
 7. Subject continues to feel angry toward target.
 8. Subject expressed threat on more than one occasion.
 9. Subject has specific plan for carrying out the threat.
 10. Subject engaged in preparation for carrying out the threat.
 11. Subject has prior conflict with target or other motive.
 12. Subject is suicidal (Complete suicide assessment).
 13. Threat involved use to a weapon other than a firearm, such as a knife or club.
 14. Threat involves use of a firearm.
 15. Subject has possession of, or ready access to, a firearm.
 16. Subject has or sought accomplices or audience for carrying out threat.
 17. Threat involves gang conflict.
 18. Threat involves peers or others who have encouraged subject in making threat.
 19. Comments/Other Relevant Observations.

Observations Suggesting Need for Intervention

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

1. History of physical violence.
2. History of criminal acts.
3. Preoccupation with violence, violent individuals, or groups that advocate violence.
4. Preoccupation with mass shootings or infamous violent incidents.
5. History of intense anger or resentment.

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

Determination of Risk Level

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

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

Please see [Considerations for Determination of Risk Level](#) section for more guidance and information to help the BTA team make its final determination of risk level:

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

- ☐ **Very Serious Substantive***: Threat where the intent to harm is present and included a threat to kill, rape, shoot, or injure with a weapon. There is at least some risk that the person will carry out the threat and requires protective action.

* Please note that for *Serious Substantive/Very Serious Substantive* threats, Clinical Parent and Clinical Student Interviews ([Interview Documents](#)) must be conducted to assist with developing the Student Support Plan (SSP).
Basis for Determination Statement

Threat assessment teams must consider the totality of risk factors, warning behaviors, stressors, precipitating events, and protective factors present. This should be analyzed in the context of the student of concern's age and social/emotional development to determine credibility and seriousness of the threat. Distinguishing between unfounded/transient versus substantive threats is critical to the determination of appropriate responses. As a reminder, substantive threats are behaviors or statements that represent a risk of harm to others and are characterized by qualities that reflect a serious intent to do harm.

Parent Notification

Please be advised that while parental consent is not required when conducting a threat assessment, parent notification is required. Parent notification is required at this phase if not already contacted for [imminent threat](#) or clinical interviews completed for [Analysis](#). Document the date, time, and name of the parent, and the outcome of the notification. Parents should be informed of the nature of the threat, who was threatened, and the consequences for the student if the threat is carried out. Enlist parental support and assistance in preventing the student from carrying out the threat.

Actions

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

- ☐ **Unfounded/No Threat**
 - Contact student's parents and/or guardian.
 - Additional responses, as determined by the threat assessment team.
- ☐ **Transient**
 - Contact student's parents and/or guardian.
 - See that threat is resolved through explanation, apology, or making amends.
 - Follow discipline procedures as per policies 5.8 and 5006, if applicable.
 - Additional responses, as determined by the threat assessment team.
- ☐ **Serious Substantive**
 - Contact student's parents and/or guardian.
 - Provide direct supervision of student until parents and/or guardians assume control.
 - Caution the student about the consequences of carrying out the threat.
 - 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. Document the name of the person who consulted with law enforcement, date, and the title of contact.
- Screen the student for mental health services and counseling and refer the student for school-based or community-based services as needed.
- Refer to CPS Team to determine need for academic/behavioral intervention and/or the need for psychological evaluation.
- Develop a Monitoring Plan to include a Safety Plan within 72 hours.
- Assign team member(s) to monitor student and status of intervention(s).
- Follow discipline procedures as per policies 5.8 and 5006.

☐ **Very Serious Substantive**

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

Action Steps & Support Plan

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

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

Notify Law Enforcement

- ☐ Was law enforcement contacted due to [*imminent threat?*](#) Complete ONLY when notifying law enforcement in cases of imminent threat to others.

Meeting Participants

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

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

Finalize BTA

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

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

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

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

Signature Page

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

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

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

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

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

BTA Process: **Substantive Threat**

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

The school-based administrator must assemble the mandatory core members of the threat assessment team. The threat assessment team shall include persons with expertise in counseling, instruction, school administration, principal, when available, and law enforcement*. Persons with expertise in counseling include school counselors, school psychologists, school social workers, and family counselors. Additional personnel with knowledge of the child or circumstances may also serve as members of the team (8). BTA team members who have been threatened should serve as a witness and source of information (e.g., Witness Interview, Teacher Input Form), but should not serve as a BTA team member to avoid conflict of interest issues and possible interference with objectivity. If possible, an alternate team member should be appointed to fill the role of the threatened BTA team member.

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

BTA Part 1

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

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

- ☐ Information about the Incident
- ☐ Sources
- ☐ Details

Additional required information:

- ☐ What was the **context** of the behavior? What was happening at the time and/or just before?

If imminent threat to others is suspected, then contact law enforcement immediately and follow [mandatory action steps to respond to imminent threat](#).

- ☐ Was law enforcement required to be contacted? Document the name of the law enforcement official contacted, date/time of contact, and outcome of contact. Complete **ONLY** when notifying law enforcement in cases of imminent threat to others.
- ☐ Mobilize the threat assessment team and complete [all required components of a BTA for substantive threat](#).

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 there are extenuating

circumstances that delay access to the student or parent to complete the required interviews, the BTA team would need to convene to complete the other components of the assessment without undue delay (e.g., Teacher Input Form, review of background information, obtaining criminal history, etc.). Please make note of the reason for delay on the EDPlan Info>Contacts Tab in EdPlan (e.g., attempts to contact parent/student and why either one was unavailable). Once all required components are completed, the BTA documents must be listed as finalized documents on the EdPlan Documents tab.

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

BTA Part 2

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

Interviews and Sources

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

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

Interview Documents

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

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

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

The Clinical Parent Interview must be completed by a mental health professional with a parent/guardian. Mental health professionals have the necessary clinical knowledge regarding mental health conditions that impact behavioral and emotional functioning. An additional school

staff member may participate, if warranted. The presence of law enforcement is not recommended during clinical interviews. This interview is also recommended if more information is needed to answer the [18 key analysis questions](#) in BTA Part 3. This document has been translated to multiple languages (Haitian-Creole, Portuguese, Spanish). Translated versions are available on EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

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

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

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

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

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

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

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

Records Review

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

Required:

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

Other, if applicable (i.e., records indicative of [risk factors](#), [warning behaviors](#), or [mitigating factors](#)):

- ☐ Records from Outside Agencies
- ☐ Law Enforcement Records
- ☐ Employment Records
- ☐ Classwork/Homework Assignments
- ☐ Journal/Artwork
- ☐ Social Media
- ☐ Other Relevant Sources of Information (i.e., original written communication of threats, witness statements referenced in [Part 1](#), photos, documents, etc.)

Following a records review, the team must answer the following question:

- ☐ Has the student previously exhibited behaviors of concern or posed a threat?

BTA Part 3

When assessing a potential threat or concerning behavior, the threat assessment team must determine not only whether a threat has been made or communicated, but also if a person poses a danger to self or others or if they are potentially on a [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 does not pose a threat to self or others ([8](#)).

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

The BTA document must be finalized at the end of Part 3 and then acknowledged by the principal and by the cadre directors for accountability. See [Finalize BTA](#) and [Signature Page](#) section for more information.

Analysis

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

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

- ☐ Threat is Likely to be Less Serious:
 1. Subject admits to threat (statement or behavior).
 2. Subject has explanation for threat as benign (such as a joke or figure of speech).
 3. Subject admits to feeling angry toward target at time of incident.
 4. Subject retracts threat or denies intent to harm.
 5. Subject apologetic or willing to make amends for threat.
 6. Subject willing to resolve threat through conflict resolution or some other means.

- ☐ Threat is Likely to be More Serious:
 7. Subject continues to feel angry toward target.
 8. Subject expressed threat on more than one occasion.
 9. Subject has specific plan for carrying out the threat.
 10. Subject engaged in preparation for carrying out the threat.
 11. Subject has prior conflict with target or other motive.
 12. Subject is suicidal (Complete suicide assessment).
 13. Threat involved use of a weapon other than a firearm, such as a knife or club.
 14. Threat involves use of a firearm.
 15. Subject has possession of, or ready access to, a firearm.
 16. Subject has or sought accomplices or audience for carrying out threat.
 17. Threat involves gang conflict.
 18. Threat involves peers or others who have encouraged subject in making threat.
 19. Comments/Other Relevant Observations.

Observations Suggesting Need for Intervention

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

1. History of physical violence.
2. History of criminal acts.
3. Preoccupation with violence, violent individuals, or groups that advocate violence.
4. Preoccupation with mass shootings or infamous violent incidents.
5. History of intense anger or resentment.

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

Determination of Risk Level

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

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

Please see [Considerations for Determination of Risk Level](#) section for more guidance and information to help the BTA team make its final determination of risk level:

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

* Please note that for *Serious Substantive/Very Serious Substantive* threats, Clinical Parent and Clinical Student Interviews ([Interview Documents](#)) must be conducted to assist with developing the Student Support Plan (SSP).

Basis for Determination Statement

Threat assessment teams must consider the totality of risk factors, warning behaviors, stressors, precipitating events, and protective factors present. This should be analyzed in the context of the student of concern's age and social/emotional development to determine credibility and seriousness of the threat. Distinguishing between unfounded/transient versus substantive threats is critical to the determination of appropriate responses. As a reminder, substantive threats are behaviors or statements that represent a risk of harm to others and are characterized by qualities that reflect a serious intent to do harm.

Parent Notification

Please be advised that while parental consent is not required when conducting a threat assessment, parent notification is required. Parent notification is required at this phase if not already contacted for [imminent threat](#) or clinical interviews completed for [Analysis](#). Document the date, time, and name of the parent, and the outcome of the notification. Parents should be informed of the nature of the threat, who was threatened, and the consequences for the student if the threat is carried out. Enlist parental support and assistance in preventing the student from carrying out the threat.

Actions

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

- ☐ Unfounded/No Threat
 - Contact student's parents and/or guardian.
 - Additional responses, as determined by the threat assessment team.
- ☐ Transient
 - Contact student's parents and/or guardian.
 - See that threat is resolved through explanation, apology, or making amends.
 - Follow discipline procedures as per policies 5.8 and 5006, if applicable.
 - Additional responses, as determined by the threat assessment team.
- ☐ Serious Substantive
 - Contact student's parents and/or guardian.
 - Provide direct supervision of student until parents and/or guardians assume control.
 - Caution the student about the consequences of carrying out the threat.
 - 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. Document the name of the person who consulted with law enforcement, date, and the title of contact.

- Screen the student for mental health services and counseling and refer the student for school-based or community-based services as needed.
- Refer to CPS Team to determine need for academic/behavioral intervention and/or the need for psychological evaluation.
- Develop a Monitoring Plan to include a Safety Plan within 72 hours.
- Assign team member(s) to monitor student and status of intervention(s).
- Follow discipline procedures as per policies 5.8 and 5006.

☐ Very Serious Substantive

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

Action Steps & Support Plan

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

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

Notify Law Enforcement

- ☐ Was law enforcement contacted due to [imminent threat?](#) Complete ONLY when notifying law enforcement in cases of imminent threat to others.

Meeting Participants

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

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

Finalize BTA

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

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

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

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

Signature Page

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

- If the final determination is that the threat is **unfounded/transient**, signatures for the administrator and at least one other school based BTA team member are required. If additional team members participated, their signatures are also required. For unfounded/transient threats, the case manager must select

“Transient-Not Required” for the core BTA team members that were not required and did not participate in the BTA.

- If the final determination is that the threat is **substantive**, signatures for all four mandatory team members are required. If additional team members participated, their signatures are also required.

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

Monitoring Plan

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

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

- The team shall identify further actions on the Monitoring Plan that must be implemented in order to mitigate risk to others (e.g., backpack checks, safety plan, etc.). A Safety Plan is required for Serious/Very Serious threats.
- Identify the names and titles of individuals who participated in the development of the Monitoring Plan. It is recommended that the original BTA members, along with the parent(s)/guardian(s) of the student of concern also be included in its development.
- Once the team has identified further actions to be taken, they must select **FINALIZE MONITORING PLAN within 72 hours** of completing BTA Part 1-3. *Please note: Finalizing this document will send alerts to the predetermined individuals for notification (i.e., School Principal).*
- Print the final page of the Monitoring Plan from the student’s Documents tab. Team members must confirm their participation by either signing the form or indicating they participated via telephone, etc.
- Upload the scanned signature page to the Documents tab for the student. On the Documents tab for the student, you will click ‘Upload External Attachments’, select the scanned signature page from your computer, and then select the Monitoring Plan document that it applies to. (Refer to EdPlan Main Menu> Resource Information> BTA).
- **The BTA team must reconvene every 30 school days (or earlier, if warranted) from the development of the initial Monitoring Plan for review and modifications.** Identify and select the review date in the Monitoring Plan before finalizing. Maintain documentation (e.g., logs, data) for all actions selected on the Monitoring Plan.
 - Upon review of a student’s Monitoring Plan, the team must determine whether to:
 - Continue Monitoring Plan with revisions.
 - Continue Monitoring Plan with no revisions.
 - Close Monitoring Plan.
 - The team must enter a rationale for their decision above.

Maintenance of Records and Information Sharing

- BTA records are considered education records and shall be maintained and released in accordance with FERPA and state statute. The BTA process is a substantive decision-making process and therefore is not subject to the amendment process as described in School Board Policy 5100.1(V). Additionally, these records will be transferred pursuant to School Board Policy 5100.2.
- SBBC will disclose personally identifiable information (PII) contained in education records or the education records themselves to other agencies when provided with a signed written consent from the student's parent/guardian or student age 18 or older designating the information that may be released.
- Pursuant to FERPA regulations and applicable state statutes, SBBC may disclose PII contained in education records or the education records in the following circumstances without obtaining written consent from the student's parent/guardian or student age 18 or older:
 - Health and safety emergency;
 - Lawfully issued subpoena or court order;
 - Upon request by authorized representatives of the state and local educational authorities.
- School-based administrators must ensure that the FERPA log is completed when disclosures are made.
 - The FERPA log can be found by clicking the following link: [FERPA DISCLOSURE LOG](#).
 - If further assistance is needed, please contact the Risk Management Privacy Officer at (754) 321-1914.
- If, during the course of conducting the BTA, an articulable health and safety emergency is identified, SBBC may share PII from a student's educational record with those state and local agencies and programs (e.g., Law Enforcement, DJJ, DOH, DCF, etc.) if the information is reasonably necessary to ensure access to appropriate services for the student(s) and to ensure safety of the student and others. School officials may disclose **only** information from education records that is required to address the health or safety concern to one or more person whose knowledge of the information is necessary to protect the health and safety of students and other individuals.
- Pursuant to F.S. §1003.25, the procedure for transferring and maintaining records of students who transfer from school to school shall be prescribed by rules of the State Board of Education. The transfer of records shall occur within 3 school days. These records shall include verified reports of serious or recurrent behavior patterns, including threat assessment evaluations and intervention services.
- If requested on the day of the BTA meeting, SBBC shall provide BTA records and any other documents used during the BTA risk determination to the School Resource Officers (SRO) or other Law Enforcement officer (LEO) who participated as a BTA team member. If the BTA takes more than a day to finalize due to extenuating circumstances, the SRO or LEO who was an active participant in the BTA can request copies once the documents are finalized.
- An LEO's body cam or any other recording devices are not to be activated during behavioral threat assessment meetings and/or interviews (Source: *Use of Body Cams by Law Enforcement at Schools*, Office of the General Counsel Memorandum Dated 10/4/2019).
- When conducting a BTA, the threat assessment team may obtain criminal history record information from SRO's/Law Enforcement Officers. No member of the threat assessment team shall redisclose or use such information beyond the BTA process.
- Parents have the right to inspect their own child's records, if requested. If BTA records are shared or released, **the names and identifying information of other students or witnesses must be redacted**. All components of the BTA must be shared with a parent requesting to inspect these records. Please refer to [BTA Overview](#) for a list of required components.

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APPENDIX A: Student Risk Intake Form

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

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

STUDENT RISK INTAKE FORM (Page 1 of 3)

INFORMATION ABOUT THE INCIDENT

Incident Type: _____ **Today's Date:** _____

Who reported this initial concern? _____

Contact Number: _____

Affiliation to School: _____

Who was this concern reported to? _____

Contact Number: _____

Affiliation to School: _____

Date Reported: _____ **Time Reported:** _____

Date Administrator Learned of Incident: _____

DMS Incident Number (if applicable): _____

Date of Incident: _____ **Time of Incident:** _____

Location of Incident: _____

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

STUDENT RISK INTAKE FORM (Page 2 of 3)

Narrative:

If a threat to others has been made, has the intended target been identified? (Circle One): Yes No

Primary Target(s): _____

Target Names: _____

WITNESSES (if applicable): Name of Witness: _____

Affiliation: _____

Contact Number: _____

Name of Law Enforcement Official Contacted (imminent threats only): _____

Date Contacted: _____ Time Contacted: _____

Outcome of Law Enforcement Official Contact: _____

INCIDENT TYPE (Check all that apply)

- ☐ **Threat to Others:** If the individual is suspected of posing a **threat of harm to others**, mobilize the threat assessment team and conduct BTA within 24 hours, starting with [BTA Part 1](#). If imminent threat to others is suspected, follow [mandatory steps to respond to imminent threats towards others](#).
- ☐ **Threat to Self:** If the individual is suspected of posing a **threat of harm to self**, then ensure the student is medically safe, maintain adult supervision, and contact a Suicide Designee or other mental health professional to conduct Suicide Risk Assessment (SRA) immediately. If imminent threat to self is suspected, follow [mandatory steps to respond to imminent threats towards self](#). Please note: If it is a threat to self ONLY you DO NOT complete any components of the Behavioral Threat Assessment process. (2).

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

APPENDIX B: BTA Incident Information Form

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

*In addition to initial information obtained through the Student Risk Intake Form, Part 1 documents more specific details regarding the incident and/or threat report and any immediate actions taken when an imminent threat has been identified. The BTA Part 1 is to be completed by a school-based administrator using information from the individual(s) making the report. BTA Part 1-3 must be 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 others, and/or concerning behavior reported. Please include the location and time of the incident, threat, or concerning behavior. Determine if there are other individuals who witnessed the student engaging in threatening, aberrant, or concerning behavior. Where threats were communicated, quote where possible, and use quotation marks to indicate direct quote. Attach original documentation, if available, later in the BTA process.

INCIDENT INFORMATION FORM (Page 2 of 3)

Narrative:

What was the context for the behavior? What was happening at the time and/or just before?

If a threat to others has been made, has the intended target been identified? (Circle One): Yes No

Primary Target(s): _____

Target Names: _____

WITNESSES (if applicable): Name of Witness: _____

Affiliation: _____

Contact Number: _____

Intake Outcome: _____

- ☐ If imminent threat to others is suspected, then contact law enforcement immediately and follow [mandatory steps to respond to imminent threats towards others.](#)

INCIDENT INFORMATION FORM (Page 3 of 3)

- ☐ Was law enforcement required to be contacted? Complete ONLY when notifying law enforcement in cases of imminent threat to others.

Name of Law Enforcement Official Contacted: _____

Date of Law Enforcement Contact: _____

Time of Law Enforcement Contact: _____

Outcome of Law Enforcement Contact: _____

- ☐ Mobilize the threat assessment team and complete all required components of a BTA.

*Regardless of law enforcement action, the threat assessment team must gather relevant information and complete BTA Parts 2 and 3 **within 24 hours of the administrator receiving the initial report**. If there are extenuating circumstances that delay access to the student or parent to complete the required interviews, the BTA team would need to convene to begin the other components of the assessment without undue delay (e.g., Teacher Input Form, review of background information, obtaining criminal history, etc.). Please make note of the reason for delay on the EDPlan Info>Contacts Tab in EdPlan (e.g., attempts to contact parent/student and why either one was unavailable). Once all required components are completed, the BTA documents must be listed as finalized documents on the EdPlan Documents tab.*

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

APPENDIX C: BTA Witness Interview

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

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

WITNESS INTERVIEW (Page 1 of 2)

Statement Date: _____

Person Taking Statement: _____

Location of Interview: _____

Directions: *Use these questions as a guide to interview the person who witnessed the concern and/or was targeted by the threat. Ask other questions as appropriate. Try to use open-ended questions rather than leading questions. If witness is a minor, record parent under emergency contact.*

WITNESS INTERVIEW QUESTIONS

1. Do you know why I want to talk to you? What happened today when you were [place of incident]? (Record person's exact words with quotation marks for key statements if possible.)

2. What exactly did (subject) say? And what exactly did (subject) do?

3. What did you think he or she meant when he or she said or did that? (Does witness believe that subject intends to carry out the threat?)

4. How do you feel about what (subject) said or did?

WITNESS INTERVIEW (Page 2 of 2)

5. What was the reason (subject) said or did that? (Probe to find out if there is a prior conflict or history to this threat.)

6. What are you going to do now? (Ask questions to determine how witness plans to respond to the threat and assist in planning a safe and non-provocative response.) What do you think he/she will do now?

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

APPENDIX D: BTA Initial Student Interview

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

INITIAL STUDENT INTERVIEW (Page 1 of 2)

Student Name:	Student ID:	Grade:
School Name:	Date of Interview:	
Interviewer Name:	Interviewer Title:	
Interviewer #2 Name: (optional)	Interviewer #2 Title: (optional)	

Directions: *Must be completed by a school-based administrator. It is recommended that a mental health professional also be present. 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. Consider the developmental level of the student and adjust the language of the questions accordingly. Use these questions as a guide to interview the person making the threat. Ask other questions as appropriate. Try to use open-ended questions rather than leading questions.*

1. Do you know why I want to talk to you? What happened today when you were [place of incident]? (Record person's exact words with quotation marks for key statements if possible.)
2. What exactly did you say and what exactly did you do?
3. What did you mean when you said or did that?
4. How do you think [person that was threatened] feels about what you said or did? (Probe to see if the subject believes it frightened or intimidated the person.)
5. What was the reason you said or did that? (Probe to find out if there is a prior conflict or history to this threat.)

INITIAL STUDENT INTERVIEW (Page 2 of 2)

6. What are you going to do now? (Ask questions to determine if the subject intends to carry out the threat.)

Key Observations:

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

APPENDIX E: BTA Teacher Input Form

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

TEACHER INPUT FORM (Page 1 of 3)

Student Name:
School Name:
Teacher Name:
Subject Taught:

Student ID: Grade:
DOB:
Date of Completion:
Current Course Grade:

Directions: *Some concerns have been raised about this student. To assist us in providing supports for this student, we need information from each of his/her teachers about his/her behavior in a variety of settings. The information you provide will be very helpful in developing a support plan for this student. Based on your observations of this student, please answer the following questions to the best of your knowledge.*

ACADEMICS

1. How is the student doing academically? Has there been any change in recent weeks?
2. What are the student's verbal skills? How well can he/she explain himself/herself in words?
3. Has this student been considered for special education or placed in special education? What kinds of difficulties does the student have? If a student is receiving special education services, ask about the problem behaviors that are regarded as part of his/her disability.

TEACHER KNOWLEDGE OF THE THREAT

1. What do you know about the threat?
2. Have you heard this student talk about things like this before?

TEACHER INPUT FORM (Page 2 of 3)

3. What have other students told you about this incident?

4. Is there another teacher or staff member who might know something about this?

STUDENT'S PEER RELATIONS

1. How well does this student get along with other students?

2. Who are the student's friends?

3. Are there students who do not get along with this student?

4. Have there been conflicts or difficulties with peers?

5. Has this student ever complained of being bullied, teased, or treated unfairly by others?

DEPRESSION

1. Have there been any apparent changes in the student's mood, demeanor, or activity level? Seemed withdrawn or apathetic?

2. Has the student expressed any attitudes that could imply depression, such as expressions of hopelessness or futility, inadequacy or shame, self-criticism or worthlessness?

TEACHER INPUT FORM (Page 3 of 3)

3. Has this student shown an increase in irritability or seemed short-tempered?

DISCIPLINE

1. What kinds of discipline problems have you experienced with this student?
2. How does this student respond to being corrected by an adult?
3. What are the student's emotional responses to being disciplined?

AGGRESSION

1. How does this student express anger?
2. Does this student seem to hold a grudge? Seem resentful?
3. Has this student done anything that expresses anger or aggression, or has an aggressive theme in written assignments, drawings, class projects, etc.?

PARENTS

1. Have you had any contact with this student's parents? What happened?

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. This document has been translated to multiple languages (Haitian-Creole, Portuguese, Spanish). Translated versions are available on EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

CLINICAL PARENT INTERVIEW (Page 1 of 8)

Student Name:	Student ID:	Grade:
School Name:	Date of Interview:	
Parent/Guardian Name:		
Interviewer Name:	Interviewer Title:	
Interviewer #2 Name: (optional)	Interviewer #2 Title: (optional)	

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

RAPPORT BUILDING AND INTERVIEW INTRODUCTION

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

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

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

PARENT KNOWLEDGE OF THE THREAT

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

CLINICAL PARENT INTERVIEW (Page 2 of 8)

2. Have you heard your child (or use child's name) talk about things like this before?
3. Are you familiar with (the intended victim)? (Ask about the child's history with the intended victim- previous relationships and interactions.)
4. Ask questions to determine if the child has the means to carry out the threat, such as access to firearms.
5. What are you planning to do about the threat? (Is the parent willing to work with the school to develop a plan to ensure the threat will not be carried out and that the student's needs are addressed?)

SCHOOL ADJUSTMENT

1. Has your child ever been suspended or expelled from school?
2. Have you ever met with the school (teacher, counselor, principal) about concerns in the past? What happened, what was going on, what was the outcome?
3. Has your child ever needed special help in school? Ever been retained?
4. Has your child ever been tested in school?

CLINICAL PARENT INTERVIEW (Page 3 of 8)

5. How does your child like school?
6. How often does your child do homework?
7. What are your child's teachers like?

FAMILY RELATIONSHIPS AND CURRENT STRESSORS

1. Who lives in the home?
2. Are there any important events that have affected your family/child? Ask about any recent or pending changes, such as: Move, divorce/separation, losses; Financial status, employment changes for parents; Others in home involved with the court or the law.
3. Who does your child share concerns with? Who is he/she close to?
4. How well does he/she get along with parents? Siblings? Types of conflicts, over what, how resolved?
5. How does your child show anger toward you and other family members?

CLINICAL PARENT INTERVIEW (Page 4 of 8)

6. What does your child do after school? Who supervises? What time is your child supposed to be home at night?
7. What responsibilities does your child have at home?
8. Does your child follow rules? What are the consequences for not following the rules?

PEER RELATIONS AND BULLYING

1. Has your child reported being teased, intimidated, rejected, or bullied in some other way? (If so, what has the parent done in response?)
2. Who are your child's friends? Are you pleased or displeased with your child's choice of friends?
3. How much is the child influenced by peers? Are there any examples of your child doing something to please peers that got him or her into trouble?

DELINQUENT BEHAVIOR

1. Has your child been in trouble with the law or with police before? What happened?
2. Has your child ever gone to juvenile court? What was it about?

CLINICAL PARENT INTERVIEW (Page 5 of 8)

3. Has your child done things that could have gotten him or her arrested or in trouble with the law? What was the worst thing? What else?
4. Does your child drink beer, wine, or other alcohol?
5. Does your child smoke marijuana?
6. Has your child used any other drugs?

HISTORY OF AGGRESSION

1. How does your child handle frustration?
2. When your child gets angry, what does he/she do?
3. Has your child gotten into fights in the past? When, where, with whom?
4. Has your child's temper ever gotten him/her into trouble?
5. Has your child ever hit you or other family members?

CLINICAL PARENT INTERVIEW (Page 6 of 8)

6. Has your child destroyed his or her own things, or someone else's property?

7. Does your child have any pets? Has he/she ever intentionally hurt the pet or some other animal?

ACCESS TO WEAPONS

1. Do you have a gun in your home? Does your child have access to firearms through friends, relatives, or some other source?

2. Does your child have access to weapons other than firearms, such as military knives, martial arts weapons, or some other kind of weapon?

3. Has your child ever talked about using a weapon to hurt someone? Ever gotten into trouble for using a weapon, carrying a weapon, or threatening someone with a weapon?

4. What can you do to restrict your child's access to weapons?

EXPOSURE TO VIOLENCE

1. Has your child ever been a victim of abuse?

2. Is your child exposed to violence in the neighborhood?

CLINICAL PARENT INTERVIEW (Page 7 of 8)

3. Do people argue much at home? Has there been any physical aggression at home?
4. What kind of movies, video games, internet sites does your child like? Any parent restrictions? Level of supervision? Child's response?

HISTORY

1. Ask about any delays in cognitive, motor, language development. How old was your child when he/she started to walk/talk?
2. Has your child ever had a problem with bedwetting? When, how long? Was anything done for this?
3. Has your child ever been hospitalized? Had any serious illnesses?
4. Has your child had any recent medical treatment? Taking any medications? Obtain diagnoses and medications. Ask for a release.

MENTAL HEALTH

1. Does your child have any problems paying attention? Does your child follow directions without repetition and reminders? Does your child complete activities on his/her own? Does your child say things without thinking? Surprised by the consequences of his/her actions?
2. What has your child's mood been like the past few weeks?

CLINICAL PARENT INTERVIEW (Page 8 of 8)

3. Has your child been unusually nervous or anxious? Irritable or short-tempered? How bad has it been?
4. Has your child had problems with sleep? Appetite? Energy level? Concentration?
5. Has your child ever talked about hurting himself or herself? Have you ever been concerned that he/she might be suicidal?
6. Have there been any times when your child seemed to be hearing things that weren't there? Has he/she said things that didn't make sense or seemed to believe in things that weren't real?
7. Has your child ever seen a counselor or therapist? Ever taken medication for his/her behavior or mood?
8. Has your child had any involvement with other agencies/programs in the community?

Close with a statement that describes short-term next steps and express gratitude to the parent/guardian(s) for their support and follow through. You may wish to inform the parent/guardian that if any emergency situation comes up at home, they should immediately contact law enforcement and/or Mobile Response Team (previously Youth Emergency Services Team) at (954) 677-3113.

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

APPENDIX 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. This document has been translated to multiple languages (Haitian-Creole, Portuguese, Spanish). Translated versions are available on EdPlan (Refer to EdPlan Main Menu> Resource Information> BTA).

CLINICAL STUDENT INTERVIEW (Page 1 of 11)

Student Name:	Student ID:	Grade:
School Name:	Date of Interview:	
Interviewer Name:	Interviewer Title:	
Interviewer #2 Name: (optional)	Interviewer #2 Title: (optional)	

Directions: *A mental health professional must complete this interview with the student of concern. An additional school staff member may participate, if warranted. 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.*

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 to meet with me?
2. We are concerned about behavior that has been reported. 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 11)

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

REVIEW OF THREAT

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

RELATIONSHIP WITH INTENDED VICTIM(S)

1. How long have you known this person?
2. What has happened in the past between you and this person?
3. What do you think this person deserves?
4. Do you see any way that things could be improved between you and this person?

FAMILY SUPPORT

1. Whom do you live with? Are there family members you don't live with? Have there been any changes in the past year?
2. Whom in your home are you close to?
3. How well do your parents/guardians know you?
4. Where do you go after school? Where are your parents/guardians at this time? How much do they keep track of where you are or what you are doing?

CLINICAL STUDENT INTERVIEW (Page 4 of 11)

5. How strict are your parents/guardians? What do they do if you do something they don't want you to do? When was the last time you got in trouble with them? What was the worst time?
6. How will your parents/guardians react (or how did they react) when they find out about this situation?

STRESS AND TRAUMA

1. What kinds of things have been going on with you lately? What sorts of things have you worried about?
2. How has your school work been going lately? Are there things you have been worried about with your school work? Other things at school?
3. What is the worst thing that has happened to you lately? Have any other bad things happened? Is there something you regret or wish you could change?
4. Have there been any changes in your family? Has anyone been sick, moved away, or had anything bad happen to them?
5. Do you have family members in jail or prison?
6. Do you take any medication?
7. Have you been involved in any counseling?

MOOD

1. What has your mood been like the past few weeks? Have you felt down or depressed at times? How bad has it been? (Be alert for statements of pessimism and hopelessness that might indicate suicide risk. If there are indications of suicidal thoughts or feelings, there should be a more extensive evaluation of suicide risk. If necessary, develop a plan for protecting the student and making appropriate referrals.)
2. Have you felt nervous or anxious? Irritable or short-tempered? How bad has it been?
3. Have you felt like life wasn't worth living? Like maybe you would kill yourself?
4. Have you ever done something to hurt yourself on purpose? Ever cut yourself on purpose?
5. Have you had any problems with your sleep? Appetite? Energy level? Concentration?
6. Have you been taking any medication to help with your mood or for any other reason?

PSYCHOTIC SYMPTOMS

Ask a few probe questions and follow up if there is any indication of delusions or hallucinations. Phrase questions appropriate to the student's age and understanding.

1. Have you had any unusual experiences lately, such as hearing things that others cannot hear or seeing things that others cannot see?

CLINICAL STUDENT INTERVIEW (Page 6 of 11)

2. Have you felt like someone was out to get you or wanted to harm you? Have you had any other fears that seem strange or out of the ordinary?
3. Do you have any abilities or powers that others do not have, such as ESP or reading minds?
4. Have you felt numb or disconnected from the world, or like you were somehow outside your body?

Note and enquire about any other symptom of mental disorder.

WEAPONS

Ask about any weapons mentioned in the threat. As an example, these questions concern a threat made to stab someone.

1. You said you were going to stab (name of victim). What were you going to stab him with?
2. Do you have a knife? What kind of a knife is it? (Or how would you get a knife?)
3. Have you ever had to use a knife with someone? What happened?
4. What do you think would happen if you did use a knife with (name of victim)?

ACCESS TO FIREARMS

Ask about firearms in all cases, even if no firearm was mentioned. If the threat involved a knife, bomb, or other weapon, ask about that weapon, too.

1. Do you have a gun?

CLINICAL STUDENT INTERVIEW (Page 7 of 11)

2. Are there guns in your home? Have you ever used a gun for hunting or target shooting?
3. If you wanted a gun, how would you get one?
4. What do you think you might do if you had a gun?
5. Have you ever had to use a gun with someone? Have you ever thought about using a gun with someone?

AGGRESSIVE BEHAVIOR

1. Do people treat you fairly? Who has been unfair with you lately? When people treat you unfairly, what do you do about it?
2. When you get angry, what do you do? Has your temper ever gotten you into trouble?
3. Do you get into fights? When was the last time? What happened?
4. Have you ever threatened to harm anyone before?
5. Have you thought about what it would be like to hurt someone really bad? Have you written any stories or made any drawings that are violent?

CLINICAL STUDENT INTERVIEW (Page 8 of 11)

6. Have you ever set fire to things?
7. Have you damaged your own property or someone else's property?
8. Have you ever intentionally hurt an animal?

SCHOOL DISCIPLINE

1. When was the last time you got into trouble in school? What happened?
2. Have you ever been suspended or expelled?
3. Have your parents ever been called to school because of your behavior?
4. Do you ever cut school or certain classes?
5. Do you feel that the rules at this school are fair? What has been unfair?

DELINQUENT BEHAVIOR

1. Have you been in trouble with the law or with police before? What happened?

CLINICAL STUDENT INTERVIEW (Page 9 of 11)

2. Have you ever gone to juvenile court? What was it about?
3. Have you done things that could have gotten you arrested or in trouble with the law? What was the worst thing? What else?
4. Do you ever drink beer, wine, or other alcohol? Have you ever? How often do you drink? When was the last time? Tell me about it.
5. Do you smoke marijuana? Have you ever? How often? When was the last time?
6. Have you used any other drugs? How often? When was the last time? Tell me about it.

EXPOSURE TO VIOLENCE

1. Do you see or hear of violence in your neighborhood?
2. Do you know anyone who was shot, stabbed, or beat up real bad?
3. Do people argue much at home? Does anyone get physically aggressive?
4. What kind of movies do you like? What kind of video games do you enjoy playing? What are your favorite internet sites?

CLINICAL STUDENT INTERVIEW (Page 10 of 11)

5. Ask the student about his/her reactions to recent acts of violence or to any highly publicized school shootings.

BULLYING

Bullying is broadly defined and may include teasing, social exclusion, or other forms of humiliation in addition to physical threats of violence. The student may not use the term “bully,” and may be reluctant to admit to being the victim of bullying behavior, so be prepared to rephrase questions and probe for victim experiences.

1. Is there anyone who has threatened you recently? Is there anyone who makes you feel afraid? (Ask about sexual threats if appropriate to situation.)
2. Is there anyone who has teased you or picked on you recently? Is there anyone who has beat you up or pushed you around? How about at home?
3. In response to any positive answer, follow up for more information: How often does it happen? What have you tried to do about it? Did you let any adult know about this, and if so, what happened?

Be alert to statements indicating that a bullied student feels there is no solution to the problem or is contemplating revenge.

PEER RELATIONS

1. What are your friends like? Have you had any trouble with your friends lately? Who is your best friend?
2. How would your friends describe you?
3. Do you have a boyfriend/girlfriend? (Keep in mind that the student might not be heterosexual, and there may be concerns in this area.) How are things going with him/her? Did you have one before? What happened to the relationship?
4. Do you have friends who get in trouble?

CLINICAL STUDENT INTERVIEW (Page 11 of 11)

5. Have you ever joined a gang? Been part of a group like a crew, clique, posse, or mob?
6. Do any of your friends know about (refer to threat situation)? What did they say about it? Anyone who feels the same way you do?

COPING

1. How do you like to spend your free time?
2. What kinds of things do you do well?
3. What are your hobbies and interests? What do you enjoy doing?
4. Can you think of a problem you faced in the past that worked out okay? Can you think of a problem that you solved? Can you think of a time when you went to someone about a problem and that person was able to solve it?
5. What are your plans for the future? What would you like to do when you finish school?
6. What could we do that would help with (refer to the problem that led to the threat)?

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

APPENDIX H: BTA Monitoring Plan

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

MONITORING PLAN (Page 1 of 2)

Student Name:

Student ID:

Grade:

School Name:

Date:

Directions: Once the BTA and SSP have been finalized, the team is required to schedule a meeting within 72 hours to create and finalize a Monitoring Plan for Serious/Very Serious Substantive threat levels. The Monitoring Plan is for on-going monitoring of support/services. The level of supervision provided to the student should be consistent with the nature and seriousness of the threat. Through the Monitoring Plan, the team identifies any actions that require continued implementation and monitoring. This includes any further actions to be taken with the student who made the threat or displayed concerning behavior. The team will also identify any actions to be taken with potential victims of the threat and/or any students impacted by the threat. The Monitoring Plan can also include documentation of any disciplinary actions taken, if applicable. Maintain documentation (e.g., logs, data) for all actions selected on the Monitoring Plan.

DISCIPLINARY ACTIONS

Student Suspended? Circle One: Yes No

Describe: _____

Student recommended for further disciplinary action and/or consideration? Circle One: Yes No

Describe: _____

FURTHER ACTIONS

Action(s) with Student Making the Threat (Check all that apply):

- ☐ Assign a mentor. Mentor Name: _____
- ☐ Develop a crisis plan to address unsafe behavior (Indv. Plan). Person Responsible: _____
- ☐ Refer for school-based counseling. Identify focus and name/position of person providing counseling: _____
- ☐ Daily or weekly check-in. Identify focus and name/position of person providing counseling: _____
- ☐ Backpack, coat, and other belongings being checked in/out. Describe and include person responsible: _____
- ☐ Increased supervision in specific settings. Identify settings: _____
- ☐ Student Safety Plan. Identify person responsible: _____
- ☐ Other Actions. Please describe below:

MONITORING PLAN (Page 2 of 2)

All of the actions selected above shall be reviewed with the following individuals who did not participate in the development meeting for this monitoring plan. List names and titles of individuals:

Name:

Title:

☐ Refer to school-based community provider. Please indicate date of referral and name of organization:

☐ Baker Act.

☐ Contact the legal guardian.

☐ Meeting with family.

Action(s) with potential victim(s) of the threat or students impacted by the threat (Check all that apply):

☐ Communicated with victim(s) and parent(s) or guardian(s)? Indicate date and by whom below:

☐ Provided brief supportive counseling? Indicate date and by whom below:

☐ Alter schedule to minimize contact with student who made threat. Person responsible: _____

☐ School-based staff to monitor student at regular intervals. Name of staff member who will monitor: _____

☐ Other Actions. Please describe below:

MEETING PARTICIPANTS

Please list names and titles of all individuals who participated in the development of the Monitoring Plan:

Name:

Title:

Signature:

The BTA team **must** reconvene every 30 school days (or earlier, if warranted) from the development of the initial Monitoring Plan for review and modifications. Upon review of a student's Monitoring Plan, the team must determine whether to: 1) Continue Monitoring Plan with revisions, 2) Continue Monitoring Plan with no revisions, 3) Close Monitoring Plan.

Anticipated Review Date: _____

District Resources & Contact Information

For the most current version of this manual and other current mental health resources, please use the <i>BCPS Mental Health Portal</i> located at: http://bcps-mentalhealth.com/
For assistance with <i>EdPlan BTA Technical Support</i> : Use “ Send Us a Message ” button on EdPlan Electronic Management System (754) 321-3400 #2
For assistance with <i>BTA district procedures</i> : Psychological Services (754) 321-3440
For assistance with <i>school violence prevention</i> : Psychological Services (754) 321-3440 School Climate & Discipline (754) 321-1655
For assistance with <i>FERPA Concerns/Questions</i> : SBBC Privacy Office (754) 321-1914
For assistance with <i>DMS/discipline</i> : School Climate & Discipline (754) 321-1655
For assistance with <i>SRA/suicide prevention, Baker Acts, SEDNET referrals, and community mental health providers</i> : SEDNET (754) 321-3421
For assistance with <i>SEL and counseling services</i> : Family Counseling (754) 321-1590 School Counseling (754) 321-1675
For assistance with <i>substance abuse prevention</i> : School Climate & Discipline (754) 321-1655
For guidance regarding <i>school safety</i> : Special Investigative Unit (SIU School Police) (754) 321-0930 Safety, Security and Emergency Preparedness: (754) 321-2655



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