



Broward County Public Schools, Florida

Compliance Audit – School Year 2022-2023: Period 2

(Period Covered: October 1, 2022 through March 12, 2023)

Threat Assessment Policy & Procedures

July 20, 2023

TABLE OF CONTENTS

Transmittal Letter	1
Background	4
Objectives and Approach	6
Sampling Methodology	7
Attributes Tested	8
Policy References	10
SY 2021 Through SY 2023 Comparisons	14
SY 2023 Period 2 Analysis.....	17
Appendix I: Behavioral Threat Assessment Department Response	20
Appendix II: Consolidated District Cabinet Responses	27
Appendix III: BTA Policy 4380.....	34
Appendix IV: BTA Procedures Manual	43

TRANSMITTAL LETTER

July 20, 2023

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



Pursuant to the approved Statement of Work dated April 11, 2023, 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 the Threat Assessment Policy & Procedures for School Year 2022-2023, period two. Our compliance audit focused on the required documentation as per the Behavioral Threat Assessment Procedures Manual (revision October 4, 2022) and the Threat Assessment Policy 4380 (revision May 17, 2022) related to assessing threats that BCPS formally identifies in their system, EdPlan. The objectives of our testing were to determine if the required forms were 1) entered or uploaded into the software, 2) substantially complete, and 3) completed/signed by the appropriate member(s) of BCPS, if applicable. *Please note RSM did not test for appropriateness of the content nor the District’s threat assessment process.* Below is an overview of the Behavioral Threat Assessment (BTA) compliance audit reports to date.

	SY 2020	SY 2021	SY 2022	SY 2023 Quarter 1	SY 2023 Period 2
Period Covered	12/1/2019 – 3/31/2020	1/1/2021 – 4/30/2021	3/8/2022 – 6/8/2022	7/1/2022 – 9/30/2022	10/01/2022 – 3/12/2023
Number of Threats Reported	875	414*	1,670	885	2,651
Very Serious	46	12	71	34	97
Serious	130	39	161	85	250
Transient	514	292	1,067	612	1,840
Unfounded	185	71*	371	154	464
Sample Size	200	75	35	35	100
Report Date	8/3/2021	4/20/2022	8/22/2022	1/18/2023	7/20/2023

* The SY 2021 report excluded unfounded threats from the population; thus, the number of threats listed in that report is 343.

Scope, Methodology, and Results

We held a kickoff meeting with representatives from the Office of the Chief Auditor (“Internal Audit”) on April 11, 2023, to understand the threat assessment process, emphasizing the updates to the process since our prior audit. We created a list of items needed for our testing based on virtual walkthroughs with management and observation of a live demonstration of the automated process and system. We worked with the District’s team and Internal Audit to obtain the applicable requested information.

The District provided us with a population of 2,793 threat assessments out of EdPlan from October 1, 2022, through March 12, 2023. Internal Audit requested that we remove charter schools and duplicate system entries from our population, which resulted in a total of 2,651 threats. Additionally, Internal Audit requested that we remove unfounded and transient threats from the population we received. Thus, the updated population of 347 includes all very serious substantive (97) and serious substantive (250) level threats. Per Internal Audit’s direction, we judgmentally selected a sample of 100 threat assessments; thus, our sample and related testing results were not designed to be representative of the population. Our full sample selection methodology is detailed on page 7.

TRANSMITTAL LETTER - CONTINUED

Scope, Methodology, and Results - Continued

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

Samples Selected and Tested by School Type and Threat Level			
School Type	Very Serious Substantive	Serious Substantive	Totals
<i>High School</i>	14	12	26
<i>Middle School</i>	11	13	24
<i>Elementary School</i>	9	12	21
<i>Centers</i>	16	13	29
Totals	50	50	100

There are 41 attributes that were tested within the 100 threats sampled. The 41 attributes tested were provided by Internal Audit and focused on school BTA roles, BTA training, 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 this report's "Attributes Tested" section.

The table below illustrates a high-level analysis of the results of our testing for SY 2022-2023 period two by risk level and school type.

By Risk Level	<ul style="list-style-type: none"> • Serious Substantive: Exceptions are noted for 34, or 68%, of the 50 serious substantive threats tested. The remaining 16 serious substantive risk threats, or 32% tested, have no exceptions. • Very Serious Substantive: Exceptions are noted for 28, or 56%, of the 50 very serious substantive risk threats tested. The remaining 22 very serious substantive risk threats, or 44% tested, have no exceptions.
By School Type*	<ul style="list-style-type: none"> • Centers: Exceptions are noted for five (5), or 71%, of the seven (7) schools tested. Two (2) Centers, or 29% tested, have no exceptions. • Elementary Schools: Exceptions are noted for ten (10), or 56%, of the eighteen (18) schools tested. Eight (8) Elementary Schools, or 44% tested, have no exceptions. • Middle Schools: Exceptions are noted for sixteen (16), or 59%, of the twenty-seven (27) schools tested. Eleven (11) Middle Schools, or 41% tested, have no exceptions. • High Schools: Exceptions are noted for fifteen (15), or 79%, of the nineteen (19) schools tested. Four (4) High Schools, or 21% tested, have no exceptions.

* Each BTA tested is based on the school where the student was located at the time of sampling. Many of these students transfer within the District following a BTA. There were 100 BTA's selected for testing, and the distribution of these samples was proportional to each type of school within the District; the actual number of schools tested was 72. The exceptions are attributed to the school with the exception; as such, the numbers will not tie to the 'Samples Selected and Tested by Risk Level and School Type' table above.

A full listing of comparative results for the last three (3) periods tested is included in the "SY 2022 through SY 2023 Comparisons" section of this report.

TRANSMITTAL LETTER – CONTINUED

Process Improvement Recommendations

To streamline documentation, the District could consider documenting the witness/target interviews entered into EdPlan on the Witness Interview Form rather than the witness statement forms. Witness statement forms vary across the District and lack information identifying the interviewer. Additionally, witness/target interviews completed could be identified on the Student Risk Intake Form or completed Behavioral Threat Assessment, dependent upon where in the process the witness was identified.

To streamline documentation, the District could consider attaching documentation of the completed interventions to the monitoring plan in EdPlan when the monitoring plan is updated or closed. Monitoring plans completed during the BTA process identify the types of interventions the school-based BTA team deems appropriate to manage or mitigate the student's risk of future violence and increase the likelihood of positive outcomes.

To clarify timeline requirements, the District could consider updating all timeliness references in the procedures manual to be based on the number of school days for uniformity. The 41 attributes the selected BTAs were tested against include seven (7) attributes testing the timely completion of a particular required task. Currently, the manual contains various references to timeliness, including hours, school days, and weeks.

To clarify the process, the District could consider updating the procedure manual to identify those members required or not to be included in the monthly BTA meetings. The school-based BTA team is required to meet monthly to discuss all current BTAs and students with active monitoring plans. Not all schools have a dedicated law enforcement officer (LEO) assigned to their school.

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

Respectfully,

RSM US LLP

RSM US LLP

BACKGROUND

BCPS has a formal set of procedures for threat assessments. The Threat Assessment Procedures Manual was initially instituted in 2002, with updates to the manual in subsequent years. BCPS has made significant changes to the process by implementing an automated system, EdPlan, used to identify and track threat assessments. BCPS updated the Behavioral Threat Assessment (BTA) procedures manual, effective October 4, 2022. The procedures manual was implemented at the beginning of the 2022-2023 period two audit and was utilized for this audit. The procedures manual was further updated on March 13, 2023, but due to the scope period for this audit ending on March 12, 2023, the previous procedures manual was used for this audit. A compliance checklist was adopted to assist schools in processing BTAs on August 28, 2022. Subsequently, the checklist was incorporated into the procedures manual.

Since the implementation of EdPlan, there have been several internal trainings and updates to the system, beginning in October 2019. Further updates followed during each following school year. Updates for the school year 2023 through the date of this report occurred: July 2022 through October 2022 and are summarized in the table below.

July 2022	August 2022	October 2022	January 2023	March 2023
<ul style="list-style-type: none"> The Behavioral Threat Assessment Department was established under the Safety, Security & Emergency Preparedness Division 	<ul style="list-style-type: none"> Behavioral Threat Assessment (BTA) Compliance Checklist adopted August 28, 2022 	<ul style="list-style-type: none"> Updated the BTA Procedures Manual, revised October 4, 2022 	<ul style="list-style-type: none"> BTA Department conducted training to mitigate repeat findings from the BTA Compliance Audit completed for scope period July 1, 2022, through September 30, 2022 	<ul style="list-style-type: none"> Updated the BTA Procedures Manual, revised March 13, 2022

BACKGROUND – CONTINUED

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

Behavioral Threat Assessment (BTA) Process Map

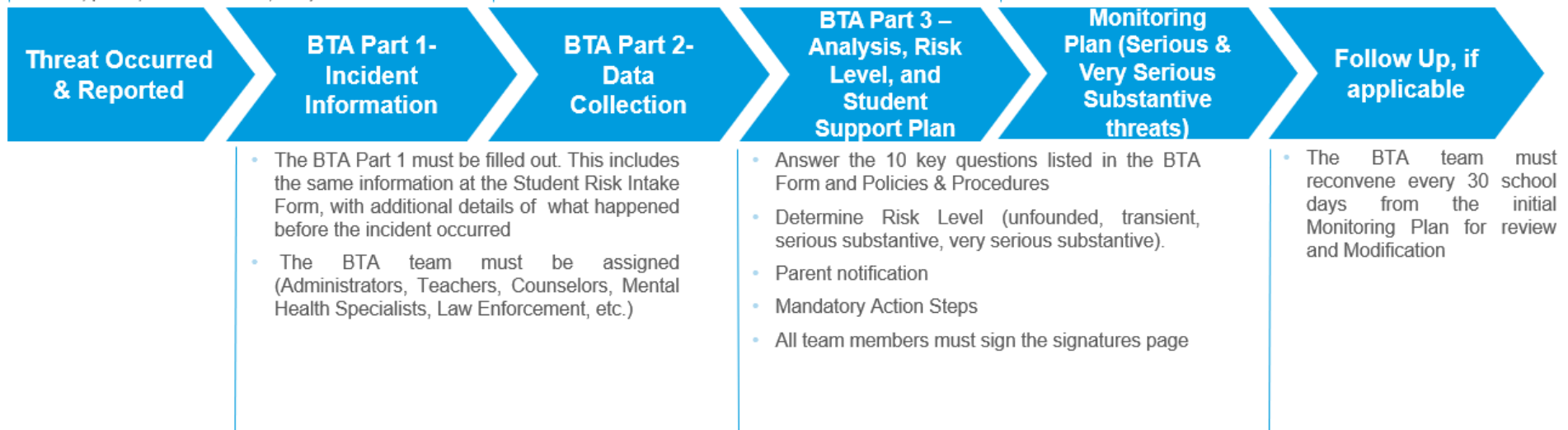
BTA teams must respond, within 24 hours when school is in session, to any report of a threat or any patterns of behavior that may pose a threat to self or others. In the absence of extenuating circumstances (e.g., student arrest, Baker Act, refusal to participate, parent unavailable until a later time,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

After a threat is reported to Administrator:

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

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

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



OBJECTIVES AND APPROACH

Objectives

Our procedures were performed in accordance with the scope and approach set forth in our executed scope of work, dated April 11, 2023, and were limited to those described therein. The scope period is October 1, 2022, through March 12, 2023. Fieldwork was performed in May and June 2023. During this time, several meetings were held with BCPS personnel to conduct system walkthroughs and discuss system updates. Exit meetings and vetting occurred in June and July 2023.

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 100 threats for compliance with the threat assessment policies and procedures through the attributes provided by Internal Audit.
- Report, both verbally and in writing, a condensed report featuring a comparison matrix that highlights the current period's results as compared to the prior two (2) reporting periods.

Approach

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

Understanding and Documentation of the Process

During this phase, we performed the following:

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

Testing for Compliance with Policy and Procedures

- Tested compliance with the BTA Policy and Procedures. We haphazardly selected 100 threats that occurred during the scope period (October 1, 2022, through March 12, 2023). The objectives of our testing were to determine if the required forms were: 1) entered or uploaded into EdPlan, 2) substantially complete, and 3) completed/signed by the appropriate BCPS member(s), if applicable. *Please note RSM did not test for the 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:
 - School BTA Roles
 - BTA Training
 - Student Risk Intake Form
 - Behavioral Threat Assessment
 - Initial Student Interview
 - Witness Interview(s), if applicable
 - Teacher Input Form
 - Clinical Parent and Student Interview
 - Monitoring Plan
 - School-based BTA team meetings

Reporting

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

SAMPLING METHODOLOGY

The threat assessment population was generated from EdPlan and provided by the District; therefore, RSM did not test the completeness of the population. A total of 347 threats were reported by school-based administrators during our scope period of October 1, 2022, through March 1, 2023, excluding charter schools, transient threats, unfounded threats, and duplicate system entries.

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

Total Population by School Type and Threat Level			
School Type	Very Serious Substantive	Serious Substantive	Totals
<i>High School</i>	14	55	69
<i>Middle School</i>	11	79	90
<i>Elementary School</i>	9	47	56
<i>Centers</i>	63	69	132
Totals	97	250	347

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 100. Internal Audit requested that we only sample from very serious substantive and serious substantive threats.

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

Samples Selected and Tested by School Type and Threat Level			
School Type	Very Serious Substantive	Serious Substantive	Totals
<i>High School</i>	14	12	26
<i>Middle School</i>	11	13	24
<i>Elementary School</i>	9	12	21
<i>Centers</i>	16	13	29
Totals	50	50	100

ATTRIBUTES TESTED

BCPS provided the following 41 attributes for testing with references to the Threat Assessment Policy and BTA Procedures manual, as applicable:

Attributes			Policy 4380*	Manual Page Num**
School BTA Roles	1	Did the school principal identify members of a BTA team that includes persons with expertise in counseling, instruction, school administration, and law enforcement?	s III(B)	7, 24, 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(G)	7
BTA Training	3	Did all school-based administrators and BTA team members attend and complete mandatory, state-approved threat assessment training (CSTAG)?	s III(C)	7-8, 40
	4	Was each team member's completion certificate uploaded to the designated electronic system?	s III(C)	7
	5a	Did the BTA team provide annual training and guidance to students and staff on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting?	s III(D)	8
	5b	Did the BTA team provide annual training and guidance to students and staff on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting?	s III(D)	8
	5c	Did the school staff inform the school community annually on recognizing concerning behaviors and the various options for reporting concerning behaviors, including anonymous reporting (e.g., FortifyFL, See Something, Say Something, Safer Watch)?	s III(E)	8
Student Intake Form	6	Was the completed Student Risk Intake Form present in EdPlan?	s IV(A); s V(F)	19, 40, 42-44
	7	Was the Student Risk Intake Form listed as a finalized document on the EdPlan Documents tab?	s IV(A); s V(F)	19, 21, 40
	8	Was the Student Risk Intake Form completed by the school administrator when initiated as a threat to others or a mental health professional if initiated as a Suicide Risk Assessment?	s IV(A)	20
	9a	Was law enforcement contacted if an imminent threat has been identified?	s IV(D)(c); s V(A)(C)(G)(H)	20, 22, 40
	9b	Were the other mandatory immediate actions taken and documented if an imminent threat has been identified?	s IV(D)(c); s V(A)(C)(G)(H)	20, 22, 40
Initial Phase/Triage Process	10	Was the completed Initial Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	s IV(A); s V(F)	19, 23, 40, 47-48
	11	Was the Initial Student Interview completed by CSTAG trained individual?	s IV(A)	19, 23, 40
	12	Was the completed Teacher Input Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?	s IV(A); s V(F)	19, 23, 40, 49-51
Witness Interview(s) (required if any witnesses were identified)	13	Was the completed Witness Interview Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?	s IV(A); s V(F)	19, 23-24, 40, 45-46
	14	Was the Witness Interview completed by a school-based administrator or CSTAG trained BTA core team member (except law enforcement)?	s IV(A)	19, 23, 40
BTA Part 1: Incident Information	15	Was the Behavioral Threat Assessment created in EdPlan?	s IV(A); s V(F)	19, 40
	16	Were all the required components of the BTA Part 1 completed?	s IV(A)	25, 40
	17	Was the BTA initiated within 24 hours (when school was in session or no later than the end of the first-day school was back in session); if no, was a reason for the delay documented in EdPlan?	s III(I)	8, 25, 37
BTA Part 2: Data Collection	18	Were all the required components of the BTA Part 2 completed?	s IV(A); s V(F)	26-28, 40, 52
Clinical Interviews (required for Substantive Threats only)	19	Was the completed Clinical Parent Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	s IV(A); s V(F)	19, 26-27, 40, 58-65
	20	Was the Clinical Parent Interview completed by a mental health professional?	s IV(A)	26, 29, 40, 58
	21	Was the completed Clinical Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	s IV(A); s V(F)	19, 27, 40, 66-76
	22	Was the Clinical Student Interview completed by a mental health professional?	s IV(A)	27, 29, 40, 66

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

** BTA Procedures Manual 2022 revision 10/4/2022

ATTRIBUTES TESTED – CONTINUED

		Attributes	Policy 4380*	Manual Page Num**
BTA Part 3: Analysis, Risk Level, and Student Support Plan	23	Were all the required components of the BTA Part 3 completed?	s IV(A); s V(F)	28-33, 40, 53-57
	24	Was the parent/guardian contacted?	s IV(C)	31, 40
	25	Was the outcome of the parent/guardian contact (or attempt(s) to contact) documented?	s IV(C)	31, 37, 40
	26	Was someone assigned responsibility to contact the threat's target(s) parent/guardian, when applicable?	s III(F)	31, 32, 40
	27	Was the BTA finalized in EdPlan?	s V(F)	19, 28, 33, 40
	28	Was the BTA finalized within 72 hours; if not, was the reason documented?	s III(I)	37, 40
	29	Was the BTA signed, in person or electronically, by all team members as required; if not, was the reason documented?	s V(F)	19, 28, 34, 37, 40
	30	Did the Principal acknowledge BTA in EdPlan? (within approx. 48 hours)	s IV(B); s V(B)	28, 33, 40
	31	Did the principal's supervisor acknowledge BTA in EdPlan within one week of the Principal's acknowledgment?	s V(B)	33
	32	Was the completed BTA documented in TERMS?	s V(F)	33
Monitoring Plan (required for Serious/Very Serious Substantive Threats)	33	Was the Monitoring Plan created?	s III(I); s IV(E)(a); s V(A)(F)	34, 40, 77-78
	34	Was the Monitoring Plan finalized in EdPlan?	s V(F)	19, 34
	35	Was the Monitoring Plan finalized within 72 hours of completing BTA; if not, was the reason documented?		34, 37, 40
	36	Was the Monitoring Plan signed by all monitoring plan meeting participants; if not, was the reason documented?	s IV(A)	34, 37, 40
	37	Was the Monitoring Plan reviewed/modified by the BTA team every 30 school days (or earlier if warranted)?	s IV(E)	35, 40, 78
	38	Was the Monitoring Plan documentation maintained for all actions selected on the monitoring plan, when applicable?	s V(F)	35, 40, 77
BTA Team Meetings	39	Did school-based BTA team meet at least monthly and maintain documentation of their meetings (dates and times, team members in attendance, cases discussed, and actions taken)?	s III(J)	8
Transferred Students: Continuation of Intervention Services	40	Did the administrator at the receiving school of a transfer student, within the district, review the BTA file within 72 hours?	s V(F)(a)	10, 40
	41	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(F)(b)	10-11, 40

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

** BTA Procedures Manual 2022 revision 10/4/2022

POLICY REFERENCES

The table below shows the policy section references for the BTA Policy 4380 (revision May 17, 2022).

Section	Brief Policy Description	Auditable	Tested at Attribute(s) / Comments
3A	The District School Safety Specialist shall ensure compliance with the policy.	No	Not auditable because this section contains goals, statements, and/or objectives that are general in nature and are not subject to audit procedures.
3B	Each school principal shall identify members of a threat assessment team.	Yes	1
3C	All school-based administrations and threat assessment members must attend and complete mandatory District threat assessment training annually. Each team member's completion certificate must be uploaded to the designated electronic system. Those members appointed during the 2021-22 school year must complete training within ninety (90) days of appointment.	Yes	3, 4
3D	All school-based administrators and BTA team members must complete an annual refresher training. The team must provide annual training and guidance to students, staff, and parents on recognizing behaviors and various options for reporting.	Yes	5a, 5b
3E	School staff will inform the school community annually on recognizing concerning behaviors and the various options for reporting.	Yes	5c
3F	Parents of public school students have a right to timely notification of threats, unlawful acts, and significant emergencies.	No	EdPlan is designed to document a school-based administrator who is <i>assigned</i> to notify the threat's target(s) parent/guardian for very serious threats, which was tested in attribute 26. The EdPlan system does not document that the notification <i>took place</i> . Thus, as this is not documented under the current process, RSM is unable to verify the notification was performed in accordance with this policy.
3G	Each school principal must assign school-based staff members who can proactively monitor and respond to incoming reports.	Yes	2
3H	All School Board of Broward County (SBBC) employees, volunteers, and contractors are required to report to school administration any expressed threat(s) or behavior(s) that may represent a threat to the community, school, or self.	No	Not auditable because this section contains goals, statements, and/or objectives that are general in nature and are not subject to audit procedures. It is not possible to audit for the completeness of these events as we can only perform audit procedures on documented threats and do not have a way to identify undocumented threats. Attribute 5b verifies schools are providing staff training on this policy statement.

POLICY REFERENCES – CONTINUED

Section	Brief Policy Description	Auditable	Tested at Attribute(s) / Comments
3I	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 the day on the first-day school is back in session to conclude if the threat is closed. It is strongly recommended that all BTAs are finalized within 72 hours when school is in session. If the BTA is not finalized within 72 hours, documentation should be entered into the electronic management system explaining the extenuating circumstances.	Yes	17, 28, 33
3J	Each school-based threat assessment team must meet as often as needed to fulfill its duties of assessing and intervening with persons whose behavior may pose a threat to school staff or students, but no less than monthly. Threat assessment teams shall maintain documentation of their meetings, including dates and times, team members in attendance, cases discussed, and actions taken.	Yes	39
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	6-8, 10-16, 18-23, & 36
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	30
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	24, 25
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	9a, 9b
4E	The BTA team must coordinate resources to intervene with individuals whose behavior may pose a threat. The BTA team must plan for the implementation and monitoring of appropriate interventions.	Yes	33, 37
5A	BTA teams shall follow established procedures for school-based community and/or health care providers for mental health services.	Yes	9a, 9b, 33

POLICY REFERENCES – CONTINUED

Section	Brief Policy Description	Auditable	Tested at Attribute(s) / Comments
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	30, 31
5C	If an immediate mental health or substance abuse crisis is suspected, school personnel must follow policies to engage behavioral health crisis resources trained in crisis intervention.	Partial	It is not possible to audit for the completeness of the population of suspected, immediate mental health abuse crises as we cannot identify undocumented crises. RSM does verify the presence of a MHP in the school-based BTA team and their involvement in the BTA in attributes 1, 2, 6-11, 19-22, 29, & 39. Additionally, RSM verifies that the MHPs participating in the BTA process are CSTAG Level 2 trained.
5D	BTA teams shall contact other agencies involved with the student and any known service providers to share information and coordinate necessary follow-up.	No	Auditors will be able to audit that other agencies are contacted but will not be able to determine the appropriateness of who was contacted nor if there were other agencies that should also have been contacted that were not, as this is a process that is based upon the BTA teams' professional judgment and knowledge at the time of the threat. RSM does verify that the District's Special Investigative Unit (SIU) is notified when imminent threats are identified in attributes 9a & 9b.
5E	The BTA team shall identify additional members of the school community to whom threatening behavior should be reported and provide guidance.	No	Auditors will be able to audit that other school community members are contacted, but will not be able to determine the appropriateness of who was contacted nor if there were other school community members that should also have been contacted that were not, as this is a process that is based upon the BTA teams' professional judgment and knowledge at the time of the threat. RSM does verify Collaborative Problem Solving (CPS) referrals occur if recommended by the BTA team in attribute 38 in addition to the SIU notification from Policy section 5D.

POLICY REFERENCES – CONTINUED

Section	Brief Policy Description	Auditable	Tested at Attribute(s) / Comments
5F	BTA records are considered education records and shall be maintained and released in accordance with FERPA and state statutes.	Yes	To audit this, RSM would need to evaluate overall user access to the EdPlan system along with all paper records maintained at each school pertaining to students to verify that only those allowed to access the records according to FERPA can access them. The schools' processes for releasing students' education records would also need to be audited. This would be a comprehensive District-wide audit in order to gain comfort over this policy reference; auditing this through the threat assessment sample would not give appropriate coverage to determine if this policy is effective.
5G	If a student may be expelled or suspended, the school shall identify ways these can be safely enacted and identify resources to assist.	Yes	33 - 39
5H	Nothing in this policy shall preclude school personnel from acting immediately to address an imminent threat and to report to the school principal or his/her designee that an individual poses a threat of violence or physical harm to self or others. Where an immediate threat to life or safety exists, reports must result in immediate notification to law enforcement.	Yes	8
5I	The Chief Auditor will conduct annual audits in compliance with the policy and report findings to the Audit Committee and The School Board.	Yes	This report is evidence of compliance with the annual audit requirement. This report is distributed and presented at Audit Committee and School Board meetings.

SY 2022 THROUGH SY 2023 COMPARISONS

The table below contains the attributes that were tested in the current period's audit (SY 2022-2023, period 2, "SY23P2") and their results as compared to the prior two (2) audit periods. The columns SY22, SY23Q1, and SY23P2 are the number of exceptions found for each attribute. Please note the items designated with "N/A" below were either not tested in the prior audits or were not comparable to the current period. The attribute numbers listed below relate to SY 2022-2023 P2 audit. Please refer to the prior years' reports for the prior year attribute numbers, as they may have changed.

Coverage Periods			3/8/2022 - 6/8/2022		7/1/2022 - 9/30/2022		10/1/2022 - 3/12/2023		SY 23 Period 2 Comments
			Sampled: 35 Very Serious: 20 Serious: 15		Sampled: 35 Very Serious: 20 Serious: 15		Sampled: 100 Very Serious: 50 Serious: 50		
Attributes			SY22	% Failed SY22	SY23Q1	% Failed SY23Q1	SY23P2	% Failed SY23P2	
School BTA Roles	1	Did the school principal identify members of a BTA team that includes persons with expertise in counseling, instruction, school administration, and law enforcement?	2	7%	1	3%	1	1%	Out of 72 schools.
	2	Did the school principal assign school-based staff members to monitor and respond to all incoming reports where safety is of concern?	0	0%	0	0%	0	0%	
BTA Training	3	Did all school-based administrators and BTA team members attend and complete mandatory state-approved threat assessment training (CSTAG)?	38	18%	10	3%	3	0.4%	Out of the 687 employees listed as BTA members who should have completed the training. The 3 members who did not attend training are 2 Mental Health Professionals (MHP) and 1 Law Enforcement Officer (LEO).
	4	Was each team member's completion certificate uploaded to the designated electronic system?	64	37%	60	19%	8	1%	676 out of 684 complied; however, 8 employees listed as BTA or School Based Administrators (SBA) members completed training but did not upload their training certificate to EdPlan.
	5a	Did the BTA team provide annual training and guidance to students and staff on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting?	5	14%	1	3%	3	3%	Out of 100 threat assessments.
	5b	Did the BTA team provide annual training and guidance to students and staff on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting?	0	0%	0	0%	0	0%	Out of 72 schools.
	5c	Did the school staff inform the school community annually on recognizing concerning behaviors and the various options for reporting concerning behaviors, including anonymous reporting (e.g., FortifyFL, See Something, Say Something, Safer Watch)?	NA		0	0%	0	0%	Out of 72 schools.
Student Intake Form	6	Was the completed Student Risk Intake Form present in EdPlan?	0	0%	0	0%	0	0%	Out of 100 threat assessments. 9a and 9b - 3 out of 100 threat assessments were determined to be imminent threats.
	7	Was the Student Risk Intake Form listed as a finalized document on the EdPlan Documents tab?	0	0%	0	0%	0	0%	
	8	Was the Student Risk Intake Form completed by the school administrator when initiated as a threat to others or a mental health professional if initiated as a Suicide Risk Assessment?	2	6%	1	3%	0	0%	
	9a	Was law enforcement contacted if an imminent threat has been identified?	N/A		N/A		0	0%	
	9b	Were the mandatory immediate actions taken and documented if an imminent threat has been identified?	0	0%	0	0%	0	0%	

SY 2022 THROUGH SY 2023 COMPARISONS – CONTINUED

Coverage Periods			3/8/2022 - 6/8/2022		7/1/2022 - 9/30/2022		10/1/2022 - 3/12/2023		SY 23 Period 2 Comments
			Sampled: 35 Very Serious: 20 Serious: 15		Sampled: 35 Very Serious: 20 Serious: 15		Sampled: 100 Very Serious: 50 Serious: 50		
Attributes			SY22	% Failed SY22	SY23Q1	% Failed SY23Q1	SY23P2	% Failed SY23P2	
Initial Phase/Triage Process	10	Was the completed Initial Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	0	0%	1	3%	0	0%	Out of 100 threat assessments.
	11	Was the Initial Student Interview completed by CSTAG trained individual?	3	9%	2	6%	0	0%	
	12	Was the completed Teacher Input Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?	0	0%	0	0%	0	0%	
Witness Interview(s) (required only if any witnesses were identified)	13	Was the completed Witness Interview Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?	8	57%	1	4%	2	2%	Out of the 85 BTAs where Witness Interview Forms were applicable, 2 did not provide documentation of a witness interview occurring. 6 of the 85 provided a Witness Statement instead of the Witness Interview Form, and these forms did not document who conducted the interview; therefore, we were unable to determine if the interviewer was CSTAG trained.
	14	Was the Witness Interview completed by a school-based administrator or CSTAG trained BTA core team member (except law enforcement)?	N/A		3	13%	6	7%	
BTA Part 1: Incident Information	15	Was the Behavioral Threat Assessment created in EdPlan?	0	0%	0	0%	0	0%	Out of 100 threat assessments.
	16	Were all the required components of the BTA Part 1 completed?	0	0%	0	0%	0	0%	This student had 2 BTAs completed for the same incident, the 1st BTA was determined to be Unfounded/Not a Threat, and the 2nd BTA was completed to upgrade the BTA to Serious. There was no documentation linking the 2 BTAs together.
	17	Was the BTA initiated within 24 hours (when school was in session or no later than the end of the first-day school was back in session); if no, was a reason for the delay documented in EdPlan?	0	0%	0	0%	1	1%	
BTA Part 2: Data Collection	18	Were all the required components of the BTA Part 2 completed?	8	23%	4	11%	1	1%	Out of 100 threat assessments.
Clinical Interviews	19	Was the completed Clinical Parent Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	1	3%	0	0%	0	0%	Out of 100 threat assessments. For attributes 20 and 22, both interviews were completed by the SBA instead of the MHP.
	20	Was the Clinical Parent Interview completed by a mental health professional?	0	0%	0	0%	1	1%	
	21	Was the completed Clinical Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	1	3%	0	0%	0	0%	
	22	Was the Clinical Student Interview completed by a mental health professional?	0	0%	0	0%	1	1%	

SY 2022 THROUGH SY 2023 COMPARISONS – CONTINUED

Coverage Periods			3/8/2022 - 6/8/2022		7/1/2022 - 9/30/2022		10/1/2022 - 3/12/2023		SY 23 Period 2 Comments
			Sampled: 35 Very Serious: 20 Serious: 15		Sampled: 35 Very Serious: 20 Serious: 15		Sampled: 100 Very Serious: 50 Serious: 50		
Attributes			SY22	% Failed SY22	SY23Q1	% Failed SY23Q1	SY23P2	% Failed SY23P2	
BTA Part 3: Analysis, Risk Level, and Student Support Plan	23	Were all the required components of the BTA Part 3 completed?	0	0%	0	0%	0	0%	Out of 100 threat assessments.
	24	Was the parent/guardian contacted?	0	0%	0	0%	0	0%	
	25	Was the outcome of the parent/guardian contact (or attempt(s) to contact) documented?	0	0%	0	0%	0	0%	
	26	Was someone assigned responsibility to contact the threat's target(s) parent/guardian, when applicable?	N/A		N/A		0	0%	
	27	Was the BTA finalized in EdPlan?	0	0%	0	0%	0	0%	
	28	Was the BTA finalized within 72 hours; if not, was the reason documented?	N/A		0	0%	3	3%	
	29	Was the BTA signed, in person or electronically, by all team members as required; if not, was the reason documented?	0	0%	0	0%	0	0%	
	30	Did the Principal acknowledge BTA in EdPlan? (within approx. 48 hours)	0	0%	0	0%	5	5%	
	31	Did the principal's supervisor acknowledge BTA in EdPlan within one week of the Principal's acknowledgment?	0	0%	0	0%	1	1%	
	32	Was the completed BTA documented in TERMS?	3	9%	0	0%	0	0%	
Monitoring Plan (required for Serious/Very Serious Substantive Threats)	33	Was the Monitoring Plan created?	3	9%	0	0%	0	0%	Out of 100 threat assessments. For attribute 38, 12 had incomplete/inaccurate logs, 18 had inaccurate logs due to variances between Pinnacle and TERMS, 1 was missing a safety plan, and 12 were a combination of logs, Collaborative Problem Solving (CPS) referrals, and student safety plans.
	34	Was the Monitoring Plan finalized in EdPlan?	0	0%	0	0%	1	1%	
	35	Was the Monitoring Plan finalized within 72 hours of completing BTA; if not, was the reason documented?	8	23%	3	9%	11	11%	
	36	Was the Monitoring Plan signed by all monitoring plan meeting participants; if not, was the reason documented?	3	9%	3	9%	1	1%	
	37	Was the Monitoring Plan reviewed/modified by the BTA team every 30 school days (or earlier if warranted)?	1	3%	3	9%	8	8%	
	38	Was the Monitoring Plan documentation maintained for all actions selected on the monitoring plan, when applicable?	3	9%	12	34%	43	43%	
BTA Team Meetings	39	Did school-based BTA team meet at least monthly and maintain documentation of their meetings (dates and times, team members in attendance, cases discussed, and actions taken)?	N/A		1	3%	2	3%	Out of 72 schools. The 2 schools met every month, but an MHP did not attend all meetings.
Transferred Students: Continuation of Intervention Services	40	Did the administrator at the receiving school of a transfer student, within the district, review the BTA file within 72 hours?	2	33%	3	33%	1	4%	Out of 27 students that transferred within the District.
	41	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	N/A	N/A	N/A	0	0%	

SY 2023 PERIOD 2 ANALYSIS

At the conclusion of each audit, the District's BTA team trains the schools on the audit findings to prevent similar findings in the future. That training occurred on January 13, 2023. The table below shows the attributes tested in SY 2023 Period 2 and the testing results prior to and after the training occurred. See the "SY 2022 Through SY 2023 Comparisons" tables for comments related to the attributes tested.

Coverage Periods			10/1/2022 - 3/12/2023		10/1/2022 - 1/13/2023		1/14/2023 - 3/12/2023	
			Sampled: 100 Very Serious: 50 Serious: 50		Sampled: 55 Very Serious: 27 Serious: 28		Sampled: 45 Very Serious: 23 Serious: 22	
Attributes			# Failed	% Failed	# Failed	% Failed	# Failed	% Failed
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?	1	1%	NA*		NA*	
	2	Did the school principal assign school-based staff members to monitor and respond to all incoming reports where safety is of concern?	0	0%	NA*		NA*	
BTA Training	3	Did all school-based administrators and BTA team members attend and complete mandatory state-approved threat assessment training (CSTAG)?	3	0.4%	NA*		NA*	
	4	Was each team member's completion certificate uploaded to the designated electronic system?	8	1.2%	NA*		NA*	
	5a	Did the BTA team provide annual training and guidance to <u>students</u> and staff on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting?	3	3%	2	4%	1	2%
	5b	Did the BTA team provide annual training and guidance to students and <u>staff</u> 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%	N/A*		N/A*	
	5c	Did the school staff inform the school community annually on recognizing concerning behaviors and the various options for reporting concerning behaviors, including anonymous reporting (e.g., FortifyFL, See Something, Say Something, Safer Watch)?	0	0%	NA*		NA*	
Student Intake Form	6	Was the completed Student Risk Intake Form present in EdPlan?	0	0%	0	0%	0	0%
	7	Was the Student Risk Intake Form listed as a finalized document on the EdPlan Documents tab?	0	0%	0	0%	0	0%
	8	Was the Student Risk Intake Form completed by the school administrator when initiated as a threat to others or a mental health professional if initiated as a Suicide Risk Assessment?	0	0%	0	0%	0	0%
	9a	Was law enforcement contacted if an imminent threat has been identified?	0	0%	0	0%	0	0%
	9b	Were the mandatory immediate actions taken and documented if an imminent threat has been identified?	0	0%	0	0%	0	0%

* Attributes 1, 2, 3, 4, 5b, 5c, and 39 test the schools that handled a portion of the BTA. A majority of the schools with exceptions in these attributes had samples covering both periods.

SY 2023 PERIOD 2 ANALYSIS - CONTINUED

Coverage Periods			10/1/2022 - 3/12/2023		10/1/2022 - 1/13/2023		1/14/2023 - 3/12/2023	
			Sampled: 100 Very Serious: 50 Serious: 50		Sampled: 55 Very Serious: 27 Serious: 28		Sampled: 45 Very Serious: 23 Serious: 22	
Attributes			# Failed	% Failed	# Failed	% Failed	# Failed	% Failed
Initial Phase/Triage Process	10	Was the completed Initial Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	0	0%	0	0%	0	0%
	11	Was the Initial Student Interview completed by CSTAG trained individual?	0	0%	0	0%	0	0%
	12	Was the completed Teacher Input Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?	0	0%	0	0%	0	0%
Witness Interview(s) (required only if any witnesses were identified)	13	Was the completed Witness Interview Form present (entered directly into EdPlan or attached to the BTA in EdPlan)?	2	2%	2	5%	0	0%
	14	Was the Witness Interview completed by a school-based administrator or CSTAG trained BTA core team member (except law enforcement)?	6	7%	6	14%	0	0%
BTA Part 1: Incident Information	15	Was the Behavioral Threat Assessment created in EdPlan?	0	0%	0	0%	0	0%
	16	Were all the required components of the BTA Part 1 completed?	0	0%	0	0%	0	0%
	17	Was the BTA initiated within 24 hours (when school was in session or no later than the end of the first-day school was back in session); if no, was a reason for the delay documented in EdPlan?	1	1%	1	2%	0	0%
BTA Part 2: Data Collection	18	Were all the required components of the BTA Part 2 completed?	1	1%	1	2%	0	0%
Clinical Interviews (required for Substantive Threats only)	19	Was the completed Clinical Parent Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	0	0%	0	0%	0	0%
	20	Was the Clinical Parent Interview completed by a mental health professional?	1	1%	1	2%	0	0%
	21	Was the completed Clinical Student Interview present (entered directly into EdPlan or attached to the BTA in EdPlan)?	0	0%	0	0%	0	0%
	22	Was the Clinical Student Interview completed by a mental health professional?	1	1%	1	2%	0	0%
BTA Part 3: Analysis, Risk Level, and Student Support Plan	23	Were all the required components of the BTA Part 3 completed?	0	0%	0	0%	0	0%
	24	Was the parent/guardian contacted?	0	0%	0	0%	0	0%
	25	Was the outcome of the parent/guardian contact (or attempt(s) to contact) documented?	0	0%	0	0%	0	0%
	26	Was someone assigned responsibility to contact the threat's target(s) parent/guardian, when applicable?	0	0%	0	0%	0	0%
	27	Was the BTA finalized in EdPlan?	0	0%	0	0%	0	0%
	28	Was the BTA finalized within 72 hours; if not, was the reason documented?	3	3%	1	2%	2	4%
	29	Was the BTA signed, in person or electronically, by all team members as required; if not, was the reason documented?	0	0%	0	0%	0	0%
	30	Did the Principal acknowledge BTA in EdPlan? (within approx. 48 hours)	5	5%	2	4%	3	7%
	31	Did the principal's supervisor acknowledge BTA in EdPlan within one week of the Principal's acknowledgment?	1	1%	1	2%	0	0%
	32	Was the completed BTA documented in TERMS?	0	0%	0	0%	0	0%

* Attributes 1, 2, 3, 4, 5b, 5c, and 39 test the schools that handled a portion of the BTA. A majority of the schools with exceptions in these attributes had samples covering both periods.

SY 2023 PERIOD 2 ANALYSIS – CONTINUED

Coverage Periods			10/1/2022 - 3/12/2023		10/1/2022 - 1/13/2023		1/14/2023 - 3/12/2023	
			Sampled: 100 Very Serious: 50 Serious: 50		Sampled: 55 Very Serious: 27 Serious: 28		Sampled: 45 Very Serious: 23 Serious: 22	
Attributes			# Failed	% Failed	# Failed	% Failed	# Failed	% Failed
Monitoring Plan (required for Serious/Very Serious Substantive Threats)	33	Was the Monitoring Plan created?	0	0%	0	0%	0	0%
	34	Was the Monitoring Plan finalized in EdPlan?	1	1%	1	2%	0	0%
	35	Was the Monitoring Plan finalized within 72 hours of completing BTA; if not, was the reason documented?	11	11%	6	11%	5	11%
	36	Was the Monitoring Plan signed by all monitoring plan meeting participants; if not, was the reason documented?	1	1%	1	2%	0	0%
	37	Was the Monitoring Plan reviewed/modified by the BTA team every 30 school days (or earlier if warranted)?	8	8%	6	11%	2	4%
	38	Was the Monitoring Plan documentation maintained for all actions selected on the monitoring plan, when applicable?	43	43%	26	47%	17	38%
BTA Team Meetings	39	Did school-based BTA team meet at least monthly and maintain documentation of their meetings (dates and times, team members in attendance, cases discussed, and actions taken)?	2	3%	N/A*		N/A*	
Transferred Students: Continuation of Intervention Services	40	Did the administrator at the receiving school of a transfer student, within the district, review the BTA file within 72 hours?	1	4%	0	0%	1	10%
	41	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?	0	0%	N/A	N/A	0	0%

* Attributes 1, 2, 3, 4, 5b, 5c, and 39 test the schools that handled a portion of the BTA. A majority of the schools with exceptions in these attributes had samples covering both periods.

APPENDIX I: BEHAVIORAL THREAT ASSESSMENT DEPARTMENT RESPONSE

Behavioral Threat Assessment Department

Ernie Lozano, Director
600 Southeast Third Avenue
Fort Lauderdale, Florida 33301
phone: 754-321-3530
ernie.lozano@browardschools.com
www.browardschools.com/bta

**The School Board of
Broward County, Florida**

Lori Alhadeff, Chair
Debra Hixon, Vice Chair

Torey Alston
Brenda Fam, Esq.
Daniel P. Faganholi
Dr. Jeff Holness
Sarah Leonardi
Nora Rupert
Dr. Allen Zeman

Dr. Peter B. Licata
Superintendent of Schools

July 12, 2023

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

FROM: Ernie Lozano, Director 
Behavioral Threat Assessment Department

SUBJECT: **District Responses to SY 2023 Period 2 Behavioral Threat Assessment Audit**

The SY 2023 Period 2 Behavioral Threat Assessment (BTA) Audit covered threat assessments initiated between October 1, 2022, through March 12, 2023. The sample size increased from 35 substantive threats during Quarter 1 of the 2022-23 SY, to a sample size of 100 substantive threats for this audit. Out of 100 samples, 38 samples had 0 audit exceptions. 81% of samples had a fail rate of 1 attribute or less. Throughout the audit's time frame, the BTA Department was in the process of reviewing all finalized BTAs, and monitoring plans completed in EdPlan. Our initiatives, contributed to the many improvements captured in this audit from the prior audit. Attribute 38 - *"Was the Monitoring Plan documentation maintained for all actions selected on the monitoring plan, when applicable?"* (Attribute 37 on prior audit) had a fail rate of 43%, which is an increase from 34% on the prior audit. A key finding with Attribute 38 was the accuracy of student attendance with the daily person possession log and the attendance record in TERMS. A daily person/possession check log failed when a student was showing as present in TERMS for a day due to a teacher error in taking attendance in Pinnacle when the student was absent for the day. The BTA Department is working with the Instructional Technology Department (IT) and the Regional Offices to establish standardized protocols for taking attendance to share with schools. If the sample documentation tested was not 100% accurate or in compliance with all actions selected on the monitoring plan, it received a fail. For example, a school could have missed one signature out of ninety days on a daily possession check log when a student was present, or attendance was showing student present on a day the student was absent and there was no signature on the log for that day. This would result in the sample failing this attribute. For Attribute 40 - *"Did the administrator of the receiving school of a transfer student, within the district, review the BTA file within 72 hours?"* the fail rate on the prior audit decreased from 33% to 4%.

Below are the district responses for each attribute that had a fail rate greater than 0% on the 2023 Period 2 Behavioral Threat Assessment Audit conducted from October 1, 2022, through March 12, 2023. This audit's time frame included days when the prior audit was still being completed and

SUBJECT: District Responses to SY 2023 Period 2 Behavioral Threat Assessment Audit

PAGE: 2 of 6

finalized. The prior audit was not presented to the audit committee until March 2, 2023, and the School Board until March 7, 2023. The BTA Department began conducting training to remedy findings with school administrators in October 2022 through January 13, 2023. The Behavioral Threat Assessment Department is focused on continuous improvement and will continue to collaborate with school leaders to address the audit findings, improve processes, and ensure threat assessments comply School Board Policy 4380 and Florida Department of Education State Statutes.

School BTA Roles

Attribute 1 District Response

The performance on this attribute had a fail rate of 1% (1). Schools are required to identify the Core Behavioral Threat Assessment (BTA) Team on the School Profile Form in EdPlan. The Behavioral Threat Assessment Department shared expectations with all principals and assistant principals on August 3, 2022, during Leadership Week. For the one sample that failed this attribute, a mental health professional was not listed on the School Profile Form. The school was notified of this omission and corrected it on a subsequent profile form after the BTA was conducted. A new Principal Verification Form is being utilized during the 2023 – 2024 school year to ensure compliance with this attribute.

Requirements reviewed with all school administrators- completion date – August 11, 2023

BTA Training

Attribute 3 District Response

This attribute had a fail rate of 0.4% (3), an improvement from the prior audit. Per state statute, all members of the school BTA Core Team must complete the Comprehensive School Threat Assessment Guidelines (CSTAG) training requirement to participate in a BTA Meeting as a Core Team Member. The sample that failed included a law enforcement officer who did not complete the CSTAG Level 2 training. For the sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff to ensure that all BTA Core Team members complete the CSTAG training.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 4 District Response

This attribute showed an improvement from the prior audit. Only 1% (1) failed this attribute. The individual did not have a certificate in EdPlan because they were district staff that supported the school in completion of the BTA. The individual was CSTAG trained. For the sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff to ensure that the certificates were uploaded into EdPlan for the 22-23 school year. For the 23-24 school year, principals will complete a verification form prior August 21, 2023, to identify the mandatory BTA Core Team members and verify that they have completed CSTAG Level 2 requirements.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 5A District Response

This attribute had a fail rate of 3% (3). For the samples that failed this attribute, the Behavioral Threat

SUBJECT: District Responses to SY 2023 Period 2 Behavioral Threat Assessment Audit

PAGE: 3 of 6

Assessment Department reviewed the process with school staff for ensuring that documentation is available to ensure school informs students and parents of threat awareness and threat reporting.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Witness Interview

Attribute 13 District Response

This attribute had a fail rate of 2% (2). For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process for completing a witness interview form with school staff.

Requirements reviewed with all school administrators- Completion Date – August 11, 2023

Attribute 14 District Response

This attribute had a fail rate of 7% (6). For the samples that failed this attribute, the schools had Witness Statement Affidavits instead of the Witness Interview Form. The auditors did not accept this form during the prior audit and the BTA Dept. was informing schools of the new process while the current audit was taking place. The BTAs in these samples were completed prior to the schools transitioning to the witness interview form in EdPlan. For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing the Witness Interview Form.

Requirements reviewed with all school administrators - Completion Date- August 11, 2023

Attribute 17 District Response

This attribute has a fail rate of 1% (1). The sample that failed was a duplicate BTA that needed to be revised after the BTA Department reviewed the initial threat level and met with the school to discuss revising the BTA. The school did initiate the threat assessment within the twenty-four-hour timeline, but there was no documentation that this was a duplicate BTA, so RSM failed the sample even though the initial BTA was in EdPlan showing the timeline for this attribute was met.

Requirements reviewed with all school administrators - Completion Date- August 11, 2023

BTA Part 2: Data Collection

Attribute 18 District Response

This attribute had a fail rate of 1% (1), which was an improvement from the prior audit that had a fail rate of 11% (4). For the sample that failed this attribute, the school was missing a required component of the record review. For the sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing the Record Review in EdPlan. As of June 2023, the system now catches when schools have an incomplete section in Part 2 and not allow the school to move forward to Part 3.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Clinical Interviews

Attribute 20 District Response

The fail rate was 1% (1). The Clinical Parent Interview was not completed by a Mental Health

SUBJECT: District Responses to SY 2023 Period 2 Behavioral Threat Assessment Audit

PAGE: 4 of 6

Professional. The Clinical Parent Interview was completed by a school-based administrator. For the sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing the Clinical Parent Interview in EdPlan.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 22 District Response

The fail rate was 1% (1) in which the Clinical Student Interview was not completed by a Mental Health Professional. The Clinical Parent Interview was completed by a school-based administrator. For the sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for completing the Clinical Parent Interview in EdPlan.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 28 District Response

The fail rate for this attribute was 3% (3). Two samples finalized the threat assessment within four days and the third sample was a duplicate BTA (the original BTA was finalized within 72 hours). For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for finalizing a BTA in EdPlan.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 30 District Response

The fail rate for this attribute was 5% (5). 3 samples were acknowledged one day late, 1 sample was 4 days late, and one was seven days late. For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with principals for acknowledging BTAs in EdPlan.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 31 District Response

The fail rate for this attribute was 1% (1). One sample was not acknowledged by the principal supervisor within the required timeline of one week after the principal acknowledgment. The Behavioral Threat Assessment Department reviewed the process with this principal supervisor for acknowledging BTAs in EdPlan.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Monitoring Plan

Attribute 34 District Response

The fail rate for this attribute was 1% (1). The school created a monitoring plan but never finalized the plan in EdPlan. For the sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process for finalizing monitoring plans in EdPlan.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 35 District Response

The fail rate for this attribute was 11% (11). The BTA Department ensured all monitoring plans were finalized. These eleven samples had documentation that RSM did not accept or did not have

SUBJECT: District Responses to SY 2023 Period 2 Behavioral Threat Assessment Audit

PAGE: 5 of 6

documentation for the delay in finalizing the plan. For example, one school documented that the parent wanted to participate in the meeting which caused the delay. RSM did not accept this response since the parent was not a mandatory participant. For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process for finalizing monitoring plans within 72 hours in EdPlan.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 36 District Response

The fail rate was 1% (1) which was an improvement from the prior audit of 9% (3). One sample was not signed by the school administrator. For the 1 sample that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for capturing signatures for meeting participants in EdPlan.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 37 District Response

The fail rate for this attribute was 8% (8). Eight samples were identified as not reviewing the monitoring plan within thirty school days. For these samples, the schools closed the plans but did not document in EdPlan that the plan was closed. Schools now have to document the rationale for closing plans in the Risk Assessment Student Notes. For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for reviewing active monitoring plans and documenting when plans are closed.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 38 District Response

Attribute 38 - "Was the Monitoring Plan documentation maintained for all actions selected on the monitoring plan, when applicable?" (Attribute 37 on prior audit) had a fail rate of 43%, an increase from 34% on prior audit. A key finding with Attribute 38 was the accuracy of student attendance with the daily person possession log and the attendance record in TERMS. A daily person/possession check log failed when a student was showing as present in TERMS for a day due to a teacher error in taking attendance in Pinnacle when the student was absent for the day. The BTA Department is working with the Instructional Technology Department (IT) and the Regional Offices to put together the standardized protocols for taking attendance to share with schools. If the sample documentation tested was not 100% accurate or in compliance with all actions selected on the monitoring plan, it received a failure. For example, a school could have missed one signature out of ninety days on a daily possession check log when a student was present, or attendance was showing student present on a day the student was absent and there was no signature on the log for that day. This would result in the sample failing this attribute. For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff for documenting the students discussed and actions taken selected in a monitoring plan to ensure actions are implemented with fidelity.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 39 District Response

The fail rate for this attribute was 3% (2). For two samples, the mental health professional was not in attendance during a meeting. For the samples that failed this attribute, the Behavioral Threat Assessment

SUBJECT: District Responses to SY 2023 Period 2 Behavioral Threat Assessment Audit

PAGE: 6 of 6

Department reviewed the process with school staff to ensure all members of the BTA Core Team attend BTA Monthly Meetings.

Requirements reviewed with all school administrators- completion date – August 11, 2023

Attribute 40 – District Response

The fail rate on this attribute was 4% (1). Only one sample failed this attribute. This attribute showed a significant improvement from the prior audit improving from a fail rate of 33% (3). For the samples that failed this attribute, the Behavioral Threat Assessment Department reviewed the process with school staff to ensure schools are reviewing EdPlan within 72 hours when a student is enrolled with an active monitoring plan.

Requirements reviewed with all school administrators- completion date – August 11, 2023


APPENDIX II: CONSOLIDATED DISTRICT CABINET RESPONSES


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

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

July 12, 2023

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

FROM: Dr. Jermaine V. Fleming 
North Regional Superintendent

VIA: Alan Strauss, Deputy Superintendent (Acting) 
Teaching & Learning

SUBJECT: RESPONSE TO BEHAVIORAL THREAT ASSESSMENT AUDIT SCHOOL YEAR 2022-2023

Please find this communication as a response to the Behavioral Threat Assessment Audit for the 10/1/2022 – 3/2/2023 period. My leadership team and I have reviewed the comprehensive report and the files that referred to schools located in the North Region. The North Region Office will continue to make the Behavior Threat Assessment Process a priority for our division. The findings, recommendations, and leadership responses from prior school year audits will guide our methodology as we monitor and provide support to our schools.

The North Regional Office Leadership Team will meet monthly with the Behavioral Threat Assessment Department to discuss trends, findings, and address any relevant corrective actions needed. The Behavior Threat Assessment topic will remain as a standing item on our weekly staff meeting agenda. It has been expanded to include a review of the attributes outlined in these audit findings.

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

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

JVF:spr

C: Extended Cabinet Members
North Region Office Leadership Team




DR. ANGELA R. FULTON, CENTRAL REGIONAL SUPERINTENDENT
CENTRAL REGION OFFICE

PHONE: 754-321-3000

EMAIL: afulton@browardschools.com

July 12, 2023

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

FROM: Dr. Angela R. Fulton 
Central Regional Superintendent

VIA: Alan Strauss 
Deputy Superintendent, Teaching & Learning (Acting)

SUBJECT: RESPONSE TO 2022-23 RSM BEHAVIORAL THREAT ASSESSMENT AUDIT (10/1/2022 - 3/12/2023)

Please find this communication as a response to the Behavioral Threat Assessment Audit for the 10/1/2022 – 3/2/2023 period. My leadership team and I have reviewed and acknowledged each response provided by the leadership of each school that received an audit exception, and will provide the necessary support to avoid future occurrences. The Central Region Office will continue to make the Behavior Threat Assessment process a priority. The findings, recommendations, and leadership responses from prior school year audits will guide our methodology as we monitor and provide ongoing support to our schools.

As a proactive measure, the Central Regional Leadership Team will meet monthly with the Behavioral Threat Assessment Department to discuss trends, findings, and address any relevant corrective actions needed. Additionally, the Behavior Threat Assessment topics will remain as a standing item on our weekly staff meeting agenda. It has been expanded to include a review of a schools' action plan to ensure measures are being implemented with fidelity. This process will help us assist school leaders and provide guidance to their respective teams.

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

The Central Region Office remains committed to providing the highest quality standards of responsibility and accountability as it relates to the Behavioral Threat Assessment process. Our commitment to addressing the audit findings and implementing necessary changes is unwavering. Should you have any further questions or require additional information, please do not hesitate to contact me.

ARF

cc: Extended Cabinet Members
Central Region Leadership Team

**CHRISTINE SEMISCH, SOUTH REGIONAL SUPERINTENDENT, TEACHING & LEARNING
(TASK ASSIGNED)
OFFICE OF THE SOUTH REGIONAL SUPERINTENDENT**

PHONE: 754-321-3200

FAX: 754-321-3216

EMAIL: christine.semisch@browardschools.com

DATE: July 12, 2023

Signature on File

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

FROM: Christine Semisch
South Regional Superintendent (Task Assigned)

VIA: Alan Strauss
Deputy Superintendent (Acting), Teaching & Learning

SUBJECT: RESPONSE TO BEHAVIORAL THREAT ASSESSMENT AUDIT 2022-2023 (10/1/2022 – 3/12/2023)

Please find this correspondence as a response to the Behavioral Threat Assessment Audit for the 2022-2023 school year (10/1/2022-3/12/2023). My leadership team and I have reviewed the audit findings and action plans for the identified schools that received an audit exception. The South Region Office will continue to make the Behavior Threat Assessment process a priority. The findings, recommendations, and leadership responses from prior school year audits will guide our methodology as we monitor and provide ongoing support to our schools.

The Behavior Threat Assessment topic will remain as a standing item on the South Region Leadership Team weekly staff meeting agenda to include the monitoring of the identified schools' action plans. Furthermore, the Behavior Threat Assessment topic will be included on Level and All Principals meeting agendas throughout the 2023-2024 school year. The topics for discussion will include Behavioral Threat Assessment trends and any relevant corrective action needed to assist school leaders as they guide their respective teams.

My office will conduct regular analyses of school-specific Behavioral Threat Assessment procedures and outcomes in schools with staff from the Behavioral Threat Assessment department. If the result of our findings warrants, we are prepared to administer disciplinary actions to school leaders and discuss areas for system and training improvements.

Again, I want to reiterate my office's unwavering commitment to ensuring the appropriate application of threat assessment protocols. This audit report has provided invaluable data and evidence that will aid my leadership team in providing support to our schools. If you need further information, please do not hesitate to reach out to me.

CS:mg

cc: Extended Cabinet Members
South Regional Leadership Team

TED TOOMER, Ed.D., ASSOCIATE SUPERINTENDENT
OFFICE OF ASSOCIATE SUPERINTENDENT

PHONE: 754-321-3800 **FAX:** 754-321-3886 **EMAIL:** ted.toomer@browardschools.com

July 12, 2023

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

FROM: Ted Toomer, Ed.D. 
Associate Superintendent

VIA: Alan Strauss 
Acting Deputy Superintendent, Teaching & Learning

**SUBJECT: RESPONSE TO BEHAVIORAL THREAT ASSESSMENT AUDIT SCHOOL YEAR
2022-2023**

This correspondence is in response to the Behavioral Threat Assessment Audit for the 10/1/2022 – 3/2/2023 period. My leadership team and I have thoroughly reviewed the comprehensive report and the files that referred to Non-Traditional schools. The Associate Superintendent's Office will continue to make the Behavior Threat Assessment Process a priority for our division. The findings, recommendations, and leadership responses from prior school year audits will guide our intention as we implement specific steps to address, monitor and provide support to our schools.

The Associate Superintendent's Leadership Team will meet monthly with the Behavioral Threat Assessment Department to discuss trends, findings, and address any relevant corrective actions needed. The Behavior Threat Assessment topic will remain as a standing agenda item on our weekly staff meetings and quarterly Associate Superintendent Principal Meetings. It has been expanded to include an ongoing review of the reporting protocols and notification methods to assist school leaders as they guide their respective school-based teams in this area.

We will continue to conduct regular analysis of school-specific behavioral threat assessment procedures and outcomes in schools with staff from the Behavioral Threat Assessment Team with special emphasis on schools with audit exception to ensure there are no repeat occurrences. Based on our findings, we will develop corrective actions and administer disciplinary actions, where necessary to ensure system and training improvements.

By way of this communication, I express my commitment to the appropriate and timely application of the threat assessment protocols for all Non-Traditional schools. This audit report has provided tangible data and evidence that will aid us in properly eliminating future exceptions and developing action plans necessary to provide the appropriate support to our schools. BCPS Guardrail 1: SAFETY and SECURITY OF OUR STUDENTS and COMMUNITY WILL REMAIN OUR PRIORITY.

TT:ad

c: Extended Cabinet Members
Associate Superintendent Office Leadership Team

Office of Safety, Security and Emergency Preparedness

Jaime Alberti, Chief Safety & Security Officer

600 Southeast Third Avenue

Fort Lauderdale, Florida 33301

phone: 754-321-2655 • fax: 754-321-2704

jaime.alberti@browardschools.com

www.browardschools.com

**The School Board of
Broward County, Florida**

Lori Alhadeff, Chair
Debra Hixon, Vice Chair

Torey Alston
Brenda Fam, Esq.
Daniel P. Foganholi
Dr. Jeff Holness
Sarah Leonardi
Nora Rupert
Dr. Allen Zeman

Dr. Peter B. Licata
Superintendent of Schools

July 13, 2023

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

FROM: Jaime Alberti, Chief Safety and Security Officer *JAA*
Office of Safety, Security & Emergency Preparedness

SUBJECT: **RESPONSE TO SY 2023 PERIOD 2 BTA AUDIT**

The period 2 Behavioral Threat Assessment (BTA) audit for SY 2023, covering the period from October 1, 2022, to March 12, 2023, has been completed. The audit sample size increased from 35 to 100 substantive threats. Out of the 100 samples, 38 demonstrated flawless compliance with no audit exceptions, and 81% of the samples had a fail rate of one or less.

While the BTA Department's initiatives have contributed to several improvements, we observed an increase in the fail rate for Attribute 38 related to maintaining Monitoring Plan documentation (43%, up from 34%). This was primarily due to discrepancies in student attendance records and indicates the need for a more precise synchronization between the daily person possession log and the TERMS attendance record. We are working with the Innovative Learning Department's Instructional Technology team and the Regional Offices to establish standardized protocols for attendance-taking.

During this audit, we also saw notably significant improvement in Attribute 40, with a decrease in the previous fail rate from 33% to a recent 4%.

We have incorporated specific actions for each attribute that failed in our improvement strategy. These actions, along with their respective completion dates, will guide our efforts to ensure compliance with School Board Policy 4380 and Florida Department of Education State Rules and Statutes. A detailed review and response plan for each attribute that had a fail rate greater than 0% already provided by Director Lozano in his response to the recent audit. Training continues to be conducted to remedy findings, and the requirements will be reviewed with all school administrators by August 11, 2023.

As always, the BTA Department remains committed to continuous improvement, ensuring that our threat assessments comply with all relevant policies and statutes.

Alan Strauss
Deputy Superintendent (Acting)
Teaching & Learning
600 Southeast Third Avenue
Fort Lauderdale, Florida 33301
phone: 754-321-2100 • fax: 754-321-2701
www.browardschools.com

**The School Board of
Broward County, Florida**

Lori Alhadeff, Chair
Debra Hixon, Vice Chair

Torey Alston
Brenda Fam, Esq.
Daniel P. Foganholi
Dr. Jeff Holness
Sarah Leonardi
Nora Rupert
Dr. Allen Zeman

July 12, 2023

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

Dr. Peter B. Licata
Superintendent of Schools

Re: **RESPONSE TO 2022-23 RSM BEHAVIORAL THREAT ASSESSMENT AUDIT (10/1/2022 – 3/12/2023)**

Please find this communication as a response to the Behavioral Threat Assessment Audit for the 10/1/2022 – 3/2/2023 period. I have reviewed the findings, recommendations, and leadership responses. The Teaching and Learning Division understands the seriousness of completing threat assessments with 100% accuracy. I will continue to work with the Associate Superintendent and Regional Superintendents to ensure 100% compliance with Policy 4380, Behavior Threat Assessment. The findings, recommendations, and leadership responses from prior school year audits will guide our methodology as we monitor and provide support to our schools.

Our division will continue to work collaboratively with our colleagues in the Behavioral Threat Assessment Department to ensure our school leaders receive the appropriate training and support in complying with the processes and procedures outlined in Policy 4380, Behavior Threat Assessment. The Behavioral Threat Assessment Department will conduct ongoing presentations throughout the 2023-2024 school year during level principal meetings, assistant principal meetings, and operational meetings.

Our division regularly reviews the data shared by the Behavioral Threat Assessment Department and follows up with school administrators to ensure any areas of concern are rectified immediately. My team reaches out to the Behavioral Threat Assessment Department to coordinate additional support to schools identified as needing additional training or guidance.

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

Sincerely,



Alan Strauss
Deputy Superintendent, Teaching & Learning (Acting)

AS:jlh

c: Teaching & Learning Superintendents

APPENDIX III: BTA POLICY 4380



POLICY NO. 4380

BEHAVIORAL THREAT ASSESSMENT (BTA)

THE SCHOOL BOARD OF BROWARD COUNTY (SBBC), FLORIDA IS COMMITTED TO PROTECTING ITS STUDENTS, EMPLOYEES, AND MEMBERS OF THE COMMUNITY. IT IS ESSENTIAL THAT DISTRICTWIDE VIOLENCE PREVENTION BE IN PLACE TO FOSTER A LEARNING ENVIRONMENT THAT PROMOTES A CULTURE OF SAFETY, RESPECT, TRUST, AND SOCIAL/EMOTIONAL SUPPORT, WHILE ALSO PROTECTING STUDENTS AND STAFF FROM CONDUCT THAT POSES AN ACTUAL OR PERCEIVED THREAT TO SELF OR OTHERS. THE BEHAVIORAL THREAT ASSESSMENT (BTA) POLICY SHALL BE INTERPRETED AND APPLIED CONSISTENTLY WITH ALL APPLICABLE STATE AND FEDERAL LAWS, AND THE BOARD'S COLLECTIVE-BARGAINING AGREEMENTS. THE POLICY 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

persons.

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

SECTION II: PURPOSE

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

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

SECTION III: DISTRICT/SCHOOL ROLES AND RESPONSIBILITIES

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

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

SECTION IV: BTA TEAM RESPONSES

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

based team (e.g., Collaborative Problem-Solving (CPS) Team, Individualized Education Plan (IEP) team, etc.)

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

SECTION V: FOLLOW-UP AND INTERVENTIONS

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

accordance with The Family Educational Rights and Privacy Act (FERPA) (34 CFR §99.31(10), §99.36).

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

Policy Custodian: Office of Academics

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

Laws Implemented: 34 C.F.R. §99.31(10); 34 C.F.R. §99.36; F.S. § 394.455;
F.S. §491.018; F.S. § 985.04; F.S. §1003.25; F.S. §1006.07(7); F.S. §1006.13; Rule
6A-1.0018, Florida Administrative Code

History: Adopted: 3/5/2019
 Amended: 10/20/2020
 Amended: 5/17/2022

APPENDIX IV: BTA PROCEDURES MANUAL

Behavioral Threat Assessment (BTA)

2022 – 2023 Procedure Manual



The School Board of Broward County, Florida

<https://www.browardschools.com/Page/76327>

Last Updated as of October 4, 2022

The School Board of Broward County, Florida



Torey Alston, Chair
Lori Alhadeff, Vice Chair
Daniel Foganholi
Debra Hixon
Sarah Leonardi
Ryan Reiter
Nora Rupert
Manuel Serrano
Kevin Tynan

Dr. Vickie L. Cartwright
Superintendent of Schools

The School Board of Broward County, Florida, prohibits any policy or procedure which results in discrimination on the basis of age, color, disability, gender, national origin, marital status, race, religion or sexual orientation. Individuals who wish to file a discrimination and/or harassment complaint may call the Director of Equal Educational Opportunities at 754-321-2150 or Teletype Machine TTY 754-321-2158.

Individuals with disabilities requesting accommodations under the Americans with Disabilities Act (ADA) may call Equal Educational Opportunities (EEO) at 754-321-2150 or Teletype Machine TTY 754-321-2158

TABLE OF CONTENTS

INTRODUCTION	5
CHAPTER 1: THE SCHOOL BOARD OF BROWARD COUNTY’S THREAT ASSESSMENT POLICY (SBBC 4380) 6	
CHAPTER 2: THREAT ASSESSMENT BEST PRACTICES AND CONSIDERATIONS	12
Pathways to Violence.....	12
Risk Factors and Warning Behaviors	13
Mitigators	14
Threat Assessment Process	14
Barriers to Engagement.....	14
Research-Based Practice	15
Considerations for Determination of Risk Level	16
Considerations for People with Disabilities.....	17
CHAPTER 3: BEHAVIORAL THREAT ASSESSMENT (BTA) PROCEDURES.....	19
Overview of BTA Procedures.....	19
Risk Assessment	21
Student Risk Intake Form	21
Mandatory Steps to Respond to Imminent Threats.....	22
Initial Phase/Triage Process	23
BTA Process: Threat Level Determination.....	24
BTA Part 1	25
BTA Part 2	26
BTA Part 3	28
Signature Page	34
Monitoring Plan	34
Maintenance of Records and Information Sharing	36
Documenting Pertinent Information in EdPlan.....	37
REFERENCES	38
APPENDIX A: Behavioral Threat Assessment (BTA) Compliance Checklist	40
APPENDIX B: Broward Detention Center Conducting Threat Assessments	40
APPENDIX C: Student Risk Intake Form	42
APPENDIX D: BTA Target/ Witness Interview	45
APPENDIX E: BTA Initial Student Interview	47
APPENDIX F: BTA Teacher Input Form.....	49
APPENDIX G: BTA Review of Records	52

APPENDIX H: BTA Analysis and Risk Level..... 53

APPENDIX I: BTA Action Steps and Support Plan 57

APPENDIX J: BTA Clinical Parent Interview 58

APPENDIX K: BTA Clinical Student Interview 66

APPENDIX L: BTA Monitoring Plan 77

District Resources & Contact Information..... 79

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). Model Behavioral Threat Assessment Policies (BTAP) and Best Practices for K-12 Schools (Rule 6A-1.0018, F.A.C.) took effect June 2022. The Office of Safe Schools adopted the evidence-based threat assessment model established by Dr. Dewey Cornell and the University of Virginia, known as the “Comprehensive School Threat Assessment Guidelines (CSTAG) Threat Assessment and Response Protocol.” The CSTAG instrument is required by all school-based threat assessment teams. Beginning with the 2022-2023 school year, threat assessment teams at each school must be fully staffed and all team members must complete CSTAG training before the start of the school year. Those appointed to threat assessment teams after the start of the school year must complete CSTAG training within ninety (90) days of appointment. Each of these highlighted the importance of ensuring fidelity to high-quality threat assessment procedures through accountability and on-going professional development.

CHAPTER 1: THE SCHOOL BOARD OF BROWARD COUNTY'S THREAT ASSESSMENT POLICY (SBBC 4380)

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 core team members and alternate core team members (e.g., additional assistant principals/administrators/social workers/instructional coaches/law enforcement/other appropriate staff) before students report to school each year.
- C. All school-based administrators and BTA team members must attend and complete mandatory district threat assessment trainings annually.
- D. All threats of violence or physical harm to self or others shall be taken seriously, since the primary goal of threat assessment is the safety of all persons involved.
- E. School-based BTA teams shall adhere to the rules and responsibilities within this policy with fidelity.

SECTION III: DISTRICT/SCHOOL ROLES AND RESPONSIBILITIES

- A. The designated District School Safety Specialist shall ensure compliance with this policy.
- B. Each school principal shall identify members of a BTA team that includes persons with expertise in counseling, instruction, school administration, and law enforcement. Members will be trained on the roles and responsibilities of each team member.
- C. All school-based administrators and BTA team members must attend and complete mandatory, state-approved threat assessment trainings. Each team member's completion certificate must be uploaded to the designated electronic system.
 - a. Per 6A-1.0018(10), F.A.C., those members appointed during the 2021-22 school year must complete training within ninety (90) days of appointment. Beginning with the 2022-23 school year, all threat assessment team members must complete CSTAG training before the start of the school year.

- b. Members appointed to threat assessment teams after the start of the school year must complete CSTAG training within ninety (90) day of appointment.
- D. All school-based administrators and BTA team members must complete an annual refresher course. The BTA team at each school must provide annual training and guidance to students and staff, on recognizing behaviors of concern, their roles, and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting.
- E. School staff will inform the school community annually on recognizing concerning behaviors and the various options for reporting concerning behaviors, including anonymous reporting (e.g., FortifyFL, See Something, Say Something, Safer Watch).
- F. Parents of public-school students have a right to timely notification of threats, unlawful acts, and significant emergencies pursuant to s.1006.07.
- G. Each school principal must assign school-based staff members who can proactively monitor and respond to all incoming reports where safety is of concern.
- H. All SBBC employees, volunteers, and contractors/vendors are expected to report to school administration any expressed threat(s) or behavior(s) that may represent a threat to the community, school, or self. Threats that are not easily recognized as harmless should be reported to the school administrator or other team member(s).
- I. Each BTA team must initiate a BTA, within 24 hours when school is in session, to any report of a threat or any patterns of behavior that may pose a threat to self or others. If school is not in session, and the school principal becomes aware of a threat or a pattern of behavior by a student that may pose a threat to self or others, he/she shall immediately refer the matter to law enforcement for evaluation, and the threat assessment team must meet no later than the end of the first day school is back in session to consider the matter and ensure it is resolved. Once school resumes the BTA core team must meet no later than the end of the first day. School teams must complete a monitoring plan if applicable. It is strongly recommended that all BTAs are finalized within 72 hours when school is in session. If the BTA is not finalized within 72 hours documentation should be entered into electronic management system explaining the extenuating circumstances.
- J. Each school-based threat assessment team must meet as often as needed to fulfill its duties of assessing and intervening with persons whose behavior may pose a threat to school staff or students, but no less than monthly. Threat assessment teams shall maintain documentation of their meetings, including dates and times, team members in attendance, cases discussed, and actions taken.
- K. Each district must ensure that all threat assessment teams in the district report by October 1 to the Office of Safe Schools on the team's activities during the previous school year. The District School Safety Specialist shall ensure all district schools timely report the information required by this paragraph by October 1 and report using the FSSAT.
 - a. For the 2021-22 school year, the information reported by each school threat assessment team shall include the total number of threat assessments conducted, the number of transient threats, and the number of substantive threats.
 - b. Beginning in the 2022-23 school year, the information submitted by each school threat assessment team shall include the gender, race, and grade level of all students assessed by the threat assessment team

SECTION IV: BTA TEAM RESPONSES

- A. When assessing a potential threat or concerning behavior, an administrator and at least one other school based BTA team member must evaluate the threat by obtaining a detailed account of the threat, usually by interviewing the person who made the threat, the intended victim, and other witnesses. The initial key question is whether there is a communication or behavior that suggests an intent to harm someone.
 - a. If the answer is no (i.e., transient) the administrator and the previously selected BTA team member(s) will proceed to complete the required portions of the BTA process. However, even if there is no intent to harm, statements or behaviors may still merit attention, intervention, or services, which can be determined by the BTA Team or the appropriate school-based team (e.g., Collaborative Problem-Solving (CPS) Team, Individualized Education Plan (IEP) team, etc.)
 - b. For students deemed a threat to self, the BTA team members must ensure the student's immediate safety, then refer the student to the school-based suicide prevention designee. The suicide prevention designee will meet with the student and assess the severity of the risk following the Suicide Prevention Manual guidelines.
 - c. If the answer is yes (i.e., substantive) and the preliminary determination by the BTA team members determines that a student poses a threat to others, all mandatory BTA team members (administrator, mental health professional, instructional employee, law enforcement, and additional personnel with knowledge of the student, when needed) are responsible for assessing the level of threat by following the state-approved threat assessment guidelines.
- B. Upon a determination by the BTA team members that a student poses a threat, all BTA threat determinations must be reported to the school principal or his/her administrative designee. The principal or his/her administrative designee will serve as the Superintendent's designee.
- C. Upon a determination by the BTA team members that a student poses a threat, the principal, or his/her administrative designee, who is participating in the BTA, shall immediately attempt to notify the student's parent or legal guardian. The principal or his/her administrative designee will serve as the Superintendent's designee.
- D. Upon a determination by the BTA team members that an individual poses a threat, authorized members of the BTA team may request and obtain criminal history record information, pursuant to s.985.04(1).
- E. 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.
 - a. The BTA team may not maintain the criminal history record or place it in the student's educational file.
 - b. 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.
- F. The BTA team must coordinate resources to provide intervention to individuals whose behavior may pose a threat to the safety of school staff or students consistent with the model policies developed by the Office of Safe Schools.
 - a. The BTA team must plan for the implementation and monitoring of appropriate interventions in order to manage or mitigate the student's risk for engaging in violence and increasing the likelihood of positive outcomes.
 - b. Interventions should remain in place until the BTA team assesses that the student is no longer in need of supports and does not pose a threat to self or others.

SECTION V: FOLLOW-UP AND INTERVENTIONS

- A. BTA teams shall follow established procedures for referrals to school-based, community, and/or health care providers for mental health services, evaluation, or treatment.
- B. The school principal will review the documentation for all threat assessments to ensure completeness and fidelity. The school principal will acknowledge that the BTA documentation is complete. The principal supervisor will acknowledge that the principal has acknowledged the BTA.
- C. If an immediate mental health or substance abuse crisis is suspected, school personnel must follow policies to engage behavioral health crisis resources, including, but not limited to, mobile crisis teams and school resource officers, who have been trained in crisis intervention. These individuals shall provide emergency intervention and assessment, make recommendations, and refer the student for appropriate services.
 - a. Schools must make a reasonable attempt to notify the parents of a minor student before the student is removed from school, school transportation, or a school-sponsored activity for an involuntary mental health examination. “A reasonable attempt to notify” means the exercise of reasonable diligence and care by the principal or the principal’s designee to make contact with the student’s parent, guardian, or other known emergency contact whom the student’s parent or guardian has authorized to receive notification of an involuntary examination.
 - b. At a minimum, the principal or the principal’s designee must take the following actions:
 - c. Use available methods of communication to contact the student’s parent, guardian, or other known emergency contact, including but not limited to, telephone calls, text messages, e-mails, and voice mail messages following the decision to initiate an involuntary examination of the student.
 - d. Document the method and number of attempts made to contact the student’s parent, guardian, or other known emergency contact, and the outcome of each attempt.
 - e. A principal or his or her designee who successfully notifies any other known emergency contact may share only the information necessary to alert such contact that the parent or caregiver must be contacted. All such information must be in compliance with federal and state law.
 - f. The district will provide annual reporting requested by the Florida Department of Education’s Office of Safe Schools to include the number of involuntary examinations, as defined in s. 394.455, which are initiated at a school, on a school transportation, or at a school sponsored activity.
- D. BTA teams shall contact other agencies involved with the student and any known service providers to share information and coordinate necessarily follow up. Any information from education records disclosed during this process shall be done in accordance with The Family Educational Rights and Privacy Act (FERPA) (34 CFR §99.31(10), §99.36).
- E. The BTA team shall identify additional members of the school community to whom threatening behavior should be reported and provide guidance to students, faculty, and staff regarding recognition of threatening or aberrant behavior that may represent a threat to the community, school, or self.
- F. BTA records are considered education records and shall be maintained and released in accordance with FERPA and state statute. The BTA process is a substantive decision-making process and therefore is not subject to the amendment process as described in School Board Policy 5100.1(V). The BTA, its determination, along with any interventions provided, will be recorded in the appropriate electronic data systems by the threat assessment team. Additionally, these records will be transferred pursuant to School Board Policy 5100.2.
 - i. 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.

- ii. Upon notification of the student's transfer to an out-of-district school, the BTA team will confirm that intervention services remain available, as applicable, until the BTA team of the receiving school independently determines the need for intervention services. Transfer of student records will occur upon request from another district or parent/guardian.

G. In addition to the BTA activities, disciplinary action and referral to law enforcement are to occur as required by law and school board policies.

- i. If a student is facing possible expulsion or suspension as a consequence of certain actions, the school should consider ways in which these can be safely enacted and identify resources that may assist the student during this time. In addition, alternatives to expulsion or referral to law enforcement agencies may be used, unless the use of such alternatives will pose a threat to school safety.

H. Nothing in this policy shall preclude school personnel from acting immediately to address an imminent threat and to report to the school principal, and/or his/her administrative designee, that an individual poses a threat of violence or physical harm to self or others.

- i. Where an immediate threat to life or physical safety exists, reports must result in an immediate notification to law enforcement.

I. The Chief Auditor will conduct annual audits, in compliance with this policy, and report findings to the Audit Committee and The School Board.

Policy Custodian: Office of Academics

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

Laws Implemented: 34 C.F.R. §99.31(10); 34 C.F.R. §99.36; F.S. § 394.455; F.S. §491.018; F.S. § 985.04; F.S. §1003.25; F.S. §1006.07(7); F.S. §1006.13; Rule 6A-1.0018, Florida Administrative Code

History: Adopted: 3/5/2019
 Amended: 10/20/2020
 Amended: 5/17/2022

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

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 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 fragile, 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 need 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 support (e.g., positive influences, religious affiliations, community groups/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)

Threat Assessment Process

The goal of the threat assessment process is to be preventative, not punitive. For this reason, the procedures outlined in this manual are based on the 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. 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. 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

During analysis of indicators of potential violence, there are many barriers that teams may face to successfully engage in the threat assessment process. 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. 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. 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.

Research-Based Practice

A multidisciplinary threat assessment team must be established within schools. This team must include personnel with expertise in school administration, counseling, instruction, and law enforcement. The designated leader (school administrator) shall initiate an initial inquiry/triage upon receiving a threat report. The leader may designate a subset of team members for additional data collection. Defined roles and responsibilities of team members during this process may include review of threatening behavior/communications, review of records, and conducting interviews. Determination of the seriousness of a threat shall be made expeditiously and in consultation with threat assessment team members. All team members should work collaboratively and communicate actively to review cases and ensure concerns have been adequately addressed.

All threats should be taken seriously and thoroughly investigated to determine the 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. Occasionally, information will simply not be available due to factors such as legal or logical impediments. 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. Law enforcement should be notified immediately in the event of an imminent threat. Research on best practices suggests the following is critical to threat assessments:

- 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. It ideally offers 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:

- 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, consideration of social media postings, and target/witness statements.
- 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.
- The team should respond to all substantive threats with protective actions, including protecting potential victims, applying conflict resolution strategies, creating and implementing a Monitoring Plan.

- The team should respond to all threats to self by determining the need for mental health services and counseling, law enforcement involvement, and a Safety Plan. A student of concern should have a carefully planned safety plan that includes individualized strategies, a series of interventions, and resources to assist the student.

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. 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.

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. 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.

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. These typically include warning behaviors such as planning and preparation, recruitment of accomplices, and acquisition of a weapon. Since all substantive threats by definition

are serious threats, the guidelines distinguish between threats that are *serious* versus *very serious*. 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. The classification of a *very serious substantive threat* is reserved for only the most serious and dangerous threat situations.

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.

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. 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. 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.

Threat assessment must always be based on an individualized process. 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. Threat assessment teams should direct their attention to symptoms and behaviors, rather than formal diagnoses, for purposes of assessing violence concern. 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. 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. 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. If a student identified as having a disability exhibits maladaptive behaviors and/or behaviors of concern, the appropriate accommodations and/or services/interventions to address these behaviors must be documented in their educational plan (e.g., 504 Plan, IEP, FBA/PBIP).

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

Below are some basic tips to follow:

- Utilize adults who are familiar with the student's unique needs and levels of functioning.

- Stress, particularly for people with mental illness, can affect the person's ability to function. In a crisis, stay calm, supportive, and ask the person what will make them feel most comfortable.
- Consider the individual's sensory needs. It may be easier for the person to function in a quiet, small environment with soft lighting and without distractions.
- Give the person your full attention. Do not interrupt them or finish their sentences. Be patient and allow the person to take their time.
- Speak directly to, and make eye contact with, the person with a disability, not to their companion, aide, or sign language interpreter. Respect the person's manner of communication (e.g., sign language, written vs. oral, etc.) and allow for sufficient processing time.
- Rephrase, rather than repeat, sentences that the person does not understand.
- Gauge the pace, complexity, and vocabulary of your speech according to theirs.
- For people with developmental disabilities, speak in clear sentences, using simple words and concrete, rather than abstract, concepts. Break down complex ideas into smaller parts.
- People with developmental disabilities may be anxious to please and may tell you what they think you want to hear. Questions should be phrased in a neutral way to elicit accurate information. Verify responses by repeating each question in a different way.
- People with autism and other developmental disabilities often prefer predictable situations. It can be helpful to make sure plans and the interview agenda 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 strategies to reduce risk of violence. After the initial phase is completed, the four mandatory BTA Core Team Members must meet to review the documentation and work collaboratively to make a risk level determination (unfounded, transient, serious substantive, or very serious substantive).

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
- ✓ Target/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.*

INITIAL PHASE/TRIAGE PROCESS

- ❑ BTA team members (school-based CSTAG trained) will conduct Initial Student Interview, Target/Witness Interview(s), and gather Teacher Input Form(s). If at any point during the initial phase of the BTA process, data indicates that the threat may be substantive rather than unfounded/transient, a clinical student interview and clinical parent interview should be conducted by a mental health professional.
- ❑ After the initial triage phase is completed, the four mandatory BTA Core Team Members must meet to review the documentation and work collaboratively to make a risk level determination (unfounded, transient, serious substantive, or very serious substantive). Schools must have signatures from all mandatory participants or documentation explaining why a signature is missing.

BTA PROCESS AT-A-GLANCE

RISK ASSESSMENT

- ☐ Complete the **Student Risk Intake Form (completed by school administrator when initiated as a threat to others or a mental health professional if initiated as a Suicide Risk Assessment)** 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*.

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 target, interviewee/interviewer and dates/time. Conduct additional clinical interviews* as needed.
- ☐ **Records Review:** Review and document required records, specify person, and their role that reviewed the information.
 - Behavioral/Discipline History
 - ESE, 504, and/or Gifted History
 - Academic/Attendance History
- ☐ **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 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?

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

- ☐ Name of Target(s)
- ☐ Name of Witness(es)
- ☐ What is their position/Affiliation to the school?
- ☐ Contact Number

Schools must complete a target/witness interview form for all identified targets/witnesses listed.

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

- ☐ **Threat to Others:** If the individual is suspected of posing a **threat of harm to others**, begin the Triage Process, mobilize the necessary BTA team members, and initiate the BTA within 24 hours. 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 Prevention 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.

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 Behavioral Threat Assessment Department (754) 321-3550 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, 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 Involuntary Examination procedures, if warranted.
- ☐ Complete and submit BCPS SIU Immediate Notification Form.
- ☐ Mobilize full threat assessment team.
- ☐ Follow discipline policy, as indicated.

If **imminent threat to self** is suspected and if the student is on campus, follow Involuntary Examination 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) 463-0911.
- ☐ Notify parent of the at-risk student and attempt to enlist their support in creating a safety and support plan.
- ☐ If a Involuntary Examination was initiated, document the name of assessor, the date/time initiated, and the outcome of the assessment.

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, the BTA team must begin to 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.

When a report of a threat is received, the BTA Team 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 Target/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 an individual with a CSTAG Level 2 certificate. It is also recommended that a mental health professional be present during this interview. **The law enforcement officer should not be present when this interview is being conducted.** 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 initial student interview can be generated by a mental health professional if there is documentation that an administrator is present during the interview.

Interviews should be conducted in a confidential setting. The interviewer should write the student responses verbatim. The interviewer must begin by attempting to establish rapport, then use these interview questions 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 to interview the person making the threat. Ask other follow-up 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 the teacher(s) that know(s) the student best. 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.

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

When applicable, Witness Interviews must be completed for all identified witnesses and the intended target by a school-based administrator or a BTA Core Team Member (except law enforcement) with the required CSTAG training. **Law enforcement should not be conducting witness interviews.** All witness interviews must be documented in EdPlan. 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 target(s) or witness(es).

Interviews should be conducted in a confidential setting. Adequate rapport will lead to more appropriate support for the student of concern.

BTA team members who have been threatened should serve as a witness and source of information (e.g., Target/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.

The initial key question is whether there is a communication or behavior that suggests an intent to harm someone. The mandatory members of the BTA Core Team must meet to review the documentation to make a final risk level determination and complete all required components for the final risk level determination.

BTA Process: Threat Level Determination

☐ Not a Threat/Unfounded ☐ Transient ☐ Serious Substantive ☐ Very Serious Substantive

In addition to Student Risk Intake Form, Initial Student Interview, Teacher Input Form, Target/Witness Interview Statements (if applicable) if the BTA Core Team determines that the threat is **unfounded/transient** the following documents must be completed: 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. If applicable, the school can implement a monitoring plan. Monitoring plans are not required for threats that are determined to be unfounded or transient. If the BTA Core Team determines 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, and law enforcement*. Persons with expertise in counseling include school counselors, school psychologists, school social workers, and family counselors. Additional personnel with knowledge of the child or circumstances may also serve as members of the team. BTA team members who have been threatened should serve as a witness and source of information (e.g., Target/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. 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-Marshalls/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 initiate the BTA **within 24 hours of the administrator receiving the initial report**. The process for conducting the Initial Student Interview should begin as soon as possible, so that if the threat is substantive, action can be taken promptly to prevent the threat from being carried out. However, in some cases it may not be possible to conduct an immediate interview – for example, if the threat was not reported until hours or days after it occurred or if the student is no longer on school premises. If it is not possible to interview the student right away, the team should gather information that is immediately available (perhaps by interviewing witnesses to the threat and/or reviewing available educational records) and decide on a reasonable, provisional course of action that emphasizes safety of anyone targeted by the threat. However, in most cases a team member will interview the student at the first opportunity in order to conduct a more complete assessment. If there are extenuating circumstances that delay access to the student or parent to complete the required interviews, the team should note the reason for delay on the EDPlan Info > Contacts Tab in EdPlan (e.g., attempts to contact parent/student and why either one was unavailable). Once all required components are completed, the BTA documents must be listed as finalized documents on the EdPlan Documents tab. If school is not in session, and the school principal becomes aware of a threat, he/she shall immediately refer the matter to law enforcement for evaluation, and the threat assessment team must meet **no later than the end of the first day school is back in session** to consider the matter and ensure it is resolved.

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?). A preliminary determination should be made during this phase to determine if a clinical student interview and clinical parent interview should be conducted (mandatory for substantive threats).

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. 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.

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

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

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

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

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

The interviewer must begin by attempting to establish rapport, then use these interview questions 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. Ask follow-up questions, as appropriate.

Records Review

Complete a review of relevant records (i.e., cumulative file, BASIS, EdPlan, Pinnacle, TERMS, Acceliplan, Florida School Safety Portal (FSSP), etc.) and summarize any information relevant to the threat assessment process. The FSSP is an additional tool that allows threat assessment teams access to information from a variety of data sources that can assist in evaluating the seriousness of a reported or identified threat. Use of the FSSP should be determined on a case-by-case basis, but is not likely needed in all cases, especially where the threat is

transient. Once the record review is completed, attach any additional relevant artifacts pertaining to the student's BTA. Specify the name of reviewer and job title for each section.

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

Required:

- ☐ 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. For all substantive threats, 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.

Assemble all mandatory BTA team members (an administrator, a mental health professional, a law enforcement officer and a teacher) to collaboratively analyze available data, determine final level of risk, and develop appropriate interventions. Schools must capture signatures electronically or attach a completed signature page to the threat assessment in EdPlan for all members who participated in the meeting or provide documentation in the Contacts Tab of why a signature was not able to be captured.

The BTA document must be finalized at the end of Part 3 and then acknowledged by the principal within approximately 48 hours (when school is in session, not counting weekends, and holidays).

The mandatory BTA Core Team Members will meet to 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.

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.

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.

Target(s) of Threat Notification

The target(s) of the threat and parent/guardian must be notified regarding the alleged or perceived threat. Proper communication is critical when notifying the target and parent/guardian to minimize the risk of escalating the situation.

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.
 - 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).
 - 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.
- 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).
- Provide direct supervision of student until parents and/o 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 your 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 an *imminent threat*?

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. All BTA team members must sign the finalized document either electronically or manually. (Refer to EdPlan Main Menu > Resource Information > BTA).

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, Directors will be emailed an alert to Acknowledge. Directors have one week to review and acknowledge a BTA. (Director Acknowledgement not required for charter schools)

Along with the electronic record in EdPlan, completed threat assessments must be documented in TERMS on the L27 panel.

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

Signature Page

All mandatory members of the Behavior Threat Assessment Team and any other individuals who participate in the threat assessment meeting to determine risk level must sign the signature page with an electronic signature or have a physical signature attached to the threat assessment in EdPlan. If a signature is unable to be captured for any reason, it should be documented on the signature page or in Contacts Tab in EdPlan.

To upload the scanned signature page to the Documents tab for the student, click on Documents tab. On the Documents tab for the student, scroll down to bottom of page and 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).

Once the BTA and SSP have 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.

Monitoring Plan

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. Daily Persons Possession check is required for all Serious/Very Serious threats. A log must be kept to document that this check occurs daily.
- 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 Parts 1-3. *Please note: Finalizing this document will send alerts to the predetermined individuals for notification (i.e., School Principal).* If monitoring plan is unable to be completed in 72 hours of completing Parts 1-3, documentation should be entered in Contacts Tab explaining reason for delay.
- All participants in the development of the monitoring plan must sign the signature page with an electronic signature or have a physical signature attached to the monitoring plan in EdPlan. If a signature is unable to be captured for any reason, it should be documented on the signature page or in Contacts Tab in EdPlan. Administrators should ensure that only individuals who participated in the monitoring plan development are listed on the signature page.
- To upload the scanned signature page of a monitoring plan to the Documents tab for the student, click on Documents tab. On the Documents tab for the student, scroll down to bottom of page and 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.

The school principal must ensure the documentation of the implementation of actions listed in Monitoring Plan. For example, schools must keep a daily log of Daily persons/Possession Check, have evidence of referral to CPS Team, counseling interventions entered in TERMS/BASIS if applicable, etc.

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.
- A 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.

Documenting Pertinent Information in EdPlan

A delay in the process or additional information that needs to be noted should be documented in EdPan in the Contacts.

1. Perform student search and locate the student.
2. Click on the student's name. The record will open to the student's information page.
3. Use the second blue toolbar, click on the EdPlan Team. A dropdown will appear and select Contacts
4. Select add a new contact in the upper righthand corner.
5. The system will prompt you to choose between parent or nonparent contact.
6. Complete all required fields in red and the detail box.
7. Save when all required fields are completed.
8. The screen will change to the list of contacts.
9. Click on the pencil under details to review the any previous contacts.

REFERENCES

1. Behavioral Threat Assessment Center. (n.d.). *Making Prevention a Reality: Identifying, Assessing, and Managing the Threat of Targeted Attacks* [PDF file]. Retrieved from <https://www.fbi.gov/file-repository/making-prevention-a-reality.pdf/view>
2. Broward County Public Schools. (2019). *Suicide Prevention and Baker Act Handbook* [PDF file]. Retrieved from https://www.bcps-mentalhealth.com/downloads/Suicide_Prevention_Manual_November_2020.pdf
3. Cornell, D. (2019). *Overview of the Comprehensive School Threat Assessment Guidelines* [PDF file]. Retrieved from <https://curry.virginia.edu/sites/default/files/images/YVP/Comprehensive%20School%20Threat%20Assessment%20Guidelines%20overview%20paper%205-10-19.pdf>
4. Cornell, D. (2018). *Comprehensive School Threat Assessment Guidelines: Intervention and Support to Prevent Violence*. School Threat Assessment Consultants LLC.
5. Florida Department of Education (FLDOE) Office of Safe Schools. (2020). *Model Behavioral Threat Assessment Policies and Best Practices for K-12 Schools* [PDF file]. Retrieved from <http://www.fldoe.org/core/fileparse.php/18612/urlt/threat-assessment-model-policies.pdf>
6. National Threat Assessment Center. (2019). *Protecting America's Schools: A U.S. Secret Service Analysis of Targeted School Violence* [PDF File]. Retrieved from https://www.secretservice.gov/data/protection/ntac/Protecting_Americas_Schools.pdf
7. National Threat Assessment Center. (2018). *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence* [PDF file]. Retrieved from https://www.dhs.gov/sites/default/files/publications/18_0711_USSS_NTAC-Enhancing-School-Safety-Guide.pdf
8. School Board of Broward County. (n.d.). *Behavioral Threat Assessment Policy* [PDF file]. Retrieved from <http://www.broward.k12.fl.us/sbbcpolicies/docs/Threat%20Assessment%20Policy.pdf>

9. The Florida Senate. (2018). Senate Bill 7026 [PDF file]. Retrieved from <https://www.flsenate.gov/Session/Bill/2018/7026/BillText/er/PDF>
10. The Florida Senate. (2019). Senate Bill 7030 [PDF file]. Retrieved from <https://www.flsenate.gov/Session/Bill/2019/7030/BillText/er/PDF>
11. United Spinal Association (2015). Disability Etiquette: Tips on Interacting with People with Disabilities [PDF file]. Retrieved from <https://www.unitedspinal.org/pdf/DisabilityEtiquette.pdf>
12. Virginia Department of Criminal Justice Services. (n.d.). *K-12 Threat Assessment in Virginia: A Prevention Overview for School Staff, Parents, and Community Members* [PDF file]. Retrieved from <https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/k12-threat-assessment-prevention-overview.pdf>
13. Virginia Department of Criminal Justice Services. (2016). *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines* [PDF file]. Retrieved from <https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf>

APPENDIX A: Behavioral Threat Assessment (BTA) Compliance Checklist

Behavioral Threat Assessment (BTA) Compliance Checklist

STUDENT NAME: _____

DOC ID in EdPlan: _____

SCHOOL: _____

DATE OF INCIDENT: _____

Compliance Requirements	
	(4) BTA Core Team Members present to determine the level of risk? <i>(School administrator, mental health professional, law enforcement, teacher/instructional)</i>
	School Profile Form updated to reflect BTA Core Team?
	All BTA Core Team members have CSTAG Level 2 and BTA Annual Update course certificate?
	Student(s) Code of Conduct signed and dated by parent/guardian for the current school year?
Student Risk Intake Form (SRIF)	
	Threat assessment initiated within 24 hours of administrator notification.
	SRIF completed by a school-based administrator ?
	Witnesses identified and their information is entered on the intake form?
	All required fields completed in EdPlan?
	SRIF listed as a finalized document in the documents tab?
	Immediate actions taken and documented if an imminent threat has been identified? <i>(If Applicable)</i>
	Intended target(s) and their parent/guardian(s) notified of the alleged/perceived threat? <i>(If Applicable)</i>
Initial Student Interview (ISI)	
	All required fields completed and entered directly into EdPlan?
	Completed by an individual with CSTAG Level 2 certificate?
Teacher Input Form (TIF)	
	All required fields completed in EdPlan?
Target/Witness Interview Form (T/WIF) <i>(If applicable)</i>	
	All required fields completed and entered directly into EdPlan? All identified witnesses must have a WIF attached in EdPlan.
	Completed by an individual with a CSTAG Level 2 certificate?
Clinical Interviews <i>(Required for substantive threats)</i> **Must be completed by Mental Health Professional**	
	Parent/Guardian contacted, and documentation completed?
	Clinical Parent Interview completed and entered in EdPlan?
	All required fields completed for Clinical Student Interview and entered in EdPlan?

Behavioral Threat Assessment (BTA)	
	Was BTA created in EdPlan?
	Part 1: All required fields complete?
	BTA initiated within 24 hours of administrator notification? <i>(If no, rationale for delay documented in EdPlan?)</i>
	Part 2: Complete all required fields. Required Records Review Section – 1. Behavioral/Discipline History 2. ESE, 504, and/or Gifted History 3. Academics/Attendance History
	Finalized witness statement for each identified witness. <i>(If Applicable)</i>
	If student previously exhibited behaviors of concern or posed a threat, a narrative describing prior incident is captured. <i>(If Applicable)</i>
	All required documents finalized (Student interview, Teacher Input form, <i>(Clinical interview and witness statement, If Applicable)</i>
	Part 3: All required fields complete?
	Parent/Guardian contacted, and documentation completed?
	BTA finalized in EdPlan?
	BTA finalized within 72 hours? <i>(If not, rationale must be documented in the Contacts tab)</i>
	ALL BTA team members signature captured electronically on the final page? <i>(If no, attachment with all signatures required)</i>
	Principal acknowledged BTA in EdPlan? <i>(Approximately 48-hours after finalization)</i>
Monitoring Plan (MP)	
	Mandatory for all Substantive Threats
	Finalized within 72 hours. <i>(Initiating school must finalize the monitoring plan)</i>
	All signatures captured electronically on the final page. <i>(If no, attachment with all signatures required)</i>
	Signed by all MP meeting participants?
	Reviewed/modified by all team members every 30 school days (or earlier if warranted).
	Documentation maintained for all actions selected on the MP, when applicable?
	Administrator from receiving school of a transfer student, reviewed the BTA within 72 hours?
	FOR OUT-OF-DISTRICT TRANSFERS ONLY: BTA team confirm that intervention services remain available, until the receiving school independently determines the need for services?

APPENDIX B: Broward Detention Center Conducting Threat Assessments

(This document is solely for the purpose of gaining access to the Detention Center; Please adhere to the district's policy for completing Threat Assessments)

Broward Regional Juvenile Detention Center (DC)

222 NW 22nd Ave. Fort Lauderdale, FL 33311

954-467-4566

BCPS Contact: Sabrina Smith, Assistant Principal: 754-321-7569; sabrina.smith@browardschools.com

Andrea Harris Administrative Assistant, Direct Line: 754-321-7164; andrea.harris@browardschools.com

Main Line: 754-321-7550

PROCEDURES:

- School Principal/Assistant Principal contacts Ms. Smith to schedule interview with student.
- Ms. Smith will call and email the School Principal/Assistant Principal of the date and time of interview; interview date and time may be the next day of the request. BCPS does not know when the youth may be released from DC; that decision is made by a judge.
- Once School Principal/Assistant Principal is emailed the tentative interview date and time, School Principal/Assistant Principal confirms interview date and time by providing the names of BCPS staff who will be requesting access to DC to interview youth (maximum: two – three persons).
- Please arrive at DC at least ten minutes before interview time.
- All individuals accessing DC are subject to a search by DC staff.
- Please have BCPS ID and/or Driver's License.
- No cell phones please - cell phones may be secured in a small locker located in the front lobby.
- Laptops are permitted; however, internet service is intermittent. A mobile hot spot, a note pad, and pencil/pen are also permitted.
- Only the student interview portions of the Threat Assessment need to be conducted at DC.
- The Assistant Principal and Mental Health staff are welcomed to conduct the Threat Assessment.
- Do not give the students anything.

Dress Code for DC:

- No open toed shoes
- No shorts
- No sleeveless tops
- No neckties
- No tight fitting clothes

If the student has been withdrawn from your school and is currently enrolled at DC 6011, please contact Jeff Stanley at jeff.stanley@browardschools.com to update TERMS/DMS. Please contact Kim Punzi-Elabiary at kim.punzi-elabiary@browardschools.com to access EdPlan.

APPENDIX C: 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 initiate the BTA within 24 hours, starting with BTA Part 1. If imminent threat to others is suspected, follow mandatory steps to respond to imminent threats towards others.
- ☐ **Threat to Self:** If the individual is suspected of posing a **threat of harm to self**, then ensure the student is medically safe, maintain adult supervision, and contact a Suicide Prevention baker 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.

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 Behavioral Threat Assessment Department (754) 321-3550 for BTA assistance and the SEDNET Department (754) 321-3421 for SRA assistance.

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

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

APPENDIX D: BTA Target/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 target(s) or witness(es).

TARGET/WITNESS INTERVIEW (Page 1 of 2)

Statement Date: _____

Person Taking Statement: _____

Name of Person Interviewed: _____

Select One: Target or Witness

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.*

WITNESS INTERVIEW QUESTIONS

10. 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.)

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

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

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

TARGET/WITNESS INTERVIEW (Page 2 of 2)

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

15. 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 E: 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:

--

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 F: 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:	Student ID:	Grade:
School Name:	DOB:	
Teacher Name:	Date of Completion:	
Subject Taught:	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 G: BTA Review of Records

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

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

☐ **Has the student previously posed a threat?** () Yes () No

APPENDIX H: BTA Analysis and Risk Level

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

Threat is likely to LESS SERIOUS:

1. Subject admits to threat (statement or behavior)
☐ Yes ☐ No ☐ Not Available
2. Subject has explanation for threat as benign (such as joke or figure of speech).
☐ Yes ☐ No ☐ Not Available
3. Subject admits feeling angry toward target at time of incident.
☐ Yes ☐ No ☐ Not Available
4. Subject admits to threat (statement or behavior)
☐ Yes ☐ No ☐ Not Available
5. Subject apologetic or willing to make amends for threat.
☐ Yes ☐ No ☐ Not Available
6. Subject willing to resolve threat through conflict resolution or some other means
☐ Yes ☐ No ☐ Not Available

Comments:

Threat is likely to MORE SERIOUS:

7. Subject continues to feel angry toward target.
☐ Yes ☐ No ☐ Not Available
8. Subject expressed threat on more than one occasion.
☐ Yes ☐ No ☐ Not Available
9. Subject has specific plan for carrying out the threat.
☐ Yes ☐ No ☐ Not Available
10. Subject engaged in preparation for carrying out the threat.
☐ Yes ☐ No ☐ Not Available
11. Subject has prior conflict with target or other motive.
☐ Yes ☐ No ☐ Not Available
12. Subject is suicidal. (Complete suicide assessment.)
☐ Yes ☐ No ☐ Not Available
13. Threat involved use of a weapon other than a firearm, such as a knife or club.
☐ Yes ☐ No ☐ Not Available
14. Threat involves use of a firearm.

☐ Yes ☐ No ☐ Not Available

15. Subject has possession of, or ready access to, a firearm.

☐ Yes ☐ No ☐ Not Available

16. Subject has or sought accomplices or audience for carrying out threat.

☐ Yes ☐ No ☐ Not Available

17. Threat involves gang conflict.

☐ Yes ☐ No ☐ Not Available

18. Threat involves peers or others who have encouraged subject in making threat.

☐ Yes ☐ No ☐ Not Available

Comments/Other Relevant Observations

Observations Suggesting Need for Intervention

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.

☐ Yes ☐ No ☐ Not Available

2. History of criminal acts.

☐ Yes ☐ No ☐ Not Available

3. Preoccupation with violence, violent individuals, or groups that advocate violence.

☐ Yes ☐ No ☐ Not Available

4. Preoccupation with mass shootings or infamous violent incidents.

☐ Yes ☐ No ☐ Not Available

5. History of intense anger or resentment.

☐ Yes ☐ No ☐ Not Available

6. Has grievance or feels treated unfairly.

☐ Yes ☐ No ☐ Not Available

7. Feels abused, harassed, or bullied.

☐ Yes ☐ No ☐ Not Available

8. History of self-injury or suicide ideation or attempts.

☐ Yes ☐ No ☐ Not Available

9. Has been seriously depressed.

☐ Yes ☐ No ☐ Not Available

10. Experienced serious stressful events or conditions.

☐ Yes ☐ No ☐ Not Available

11. Substance abuse history.

☐ Yes ☐ No ☐ Not Available

12. History of serious mental illness (symptoms such as delusions or hallucinations).

☐ Yes ☐ No ☐ Not Available

13. Qualifies for exceptional student education services or 504 plan.

☐ Yes ☐ No ☐ Not Available

14. Prescribed psychotropic medication.

☐ Yes ☐ No ☐ Not Available

15. Substantial decline in level of academic or psychosocial adjustment.

☐ Yes ☐ No ☐ Not Available

16. Lacks positive relationships with one or more school staff.

☐ Yes ☐ No ☐ Not Available

17. Family involvement.

☐ Yes ☐ No ☐ Not Available

18. Lacks positive relationships with peers.

☐ Yes ☐ No ☐ Not Available

19. Other factors that suggest need for intervention.

☐ Yes ☐ No ☐ Not Available

Comments

RISK: DETERMINATION OF RISK LEVEL

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

NOTICE: Once the determination is made, please remember to enter the corresponding intervention code (220 - Unfounded; 221 - Transient; 222 - Serious Substantive; or 223 - Very Serious Substantive) in **TERMS**.

- Not a Threat/Unfounded: 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.

Basis for Determination

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 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.

Notify Law Enforcement (If Applicable)

Date of Notification: _____ Time of Notification: _____

Law Enforcement Contact: _____

Meeting Participants

Name	Role	Signature
_____	Administrator	_____
_____	Mental Health Professional	_____
_____	Law Enforcement Official	_____
_____	Teacher	_____
_____	Other BTA Team Member	_____

APPENDIX I: BTA Action Steps and Support Plan

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

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

APPENDIX J: 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 K: 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?

CLINICAL STUDENT INTERVIEW (Page 3 of 11)

RELATIONSHIP WITH INTENDED VICTIM(S)

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

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?

CLINICAL STUDENT INTERVIEW (Page 5 of 11)

MOOD

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

PSYCHOTIC SYMPTOMS

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 L: 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: _____
- ☐ Daily Persons Possession Check. 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 calendar 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, please access EdPlan and located at: Behavior Threat Assessment
For assistance with <i>EdPlan BTA Technical Support</i> : Use “ Send Us a Message ” button on EdPlan (Envelope Icon next to name) Call (754) 321-3550 Email BTASupport@browardschools.com
For assistance with <i>BTA district procedures</i> : Behavioral Threat Assessment Department Call (754) 321-3550 Email BTASupport@browardschools.com
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



RSM US LLP
201 E Las Olas Blvd, Suite 25000
Ft. Lauderdale, Florida 33301
(954) 462-6300
www.rsmus.com

www.rsmus.com

RSM US LLP is a limited liability partnership and the U.S. member firm of RSM International, a global network of independent audit, tax and consulting firms. The member firms of RSM International collaborate to provide services to global clients, but are separate and distinct legal entities that cannot obligate each other. Each member firm is responsible only for its own acts and omissions, and not those of any other party.

For more information, visit rsmus.com/aboutus for more information regarding RSM US LLP and RSM International.

© 2023 RSM US LLP. All Rights Reserved.