OFFICE OF THE CHIEF AUDITOR

INTERNAL AUDIT REPORT

BEHAVIORAL THREAT ASSESSMENT – MONITORING PLANS

FOR THE SCHOOL YEAR 2023-2024

To be presented to the:

Audit Committee
On April 11, 2024

The School Board of Broward County, Florida
On May 21, 2024

TABLE OF CONTENTS

Compliance Audit - Behavioral Threat Assessment Monitoring Plans
Internal Audit Report
Issued: April 11, 2024

BROWARD
County Public Schools
Established 1915

TRANSMITTAL LETTER

April 11, 2024

Members of the School Board of Broward County, Florida
Members of the School Board Audit Committee
Dr. Peter B. Licata, Superintendent of Schools

In accordance with the School Board of Broward County, Florida ("SBBC" or "District") Audit Plan for the 2023-2024 School/Fiscal Year, the Office of the Chief Auditor ("OCA") conducted a compliance audit of the District's Behavioral Threat Assessment Monitoring Plans for the School Year 2023-2024, Quarters 1 and 2. The audit covered monitoring plans that began in July 2023 through October 2023 and were tracked through December 2023.

Our report is organized into the following sections:

Executive Summary	Brief description of the audit subject area, audit scope and methodology, scope limitations, and results
Objectives	Goals for the audit
Background	Summary of the audit subject area and the impact to the District and District personnel responsibilities
Scope and Methodology	Audit scope and approach, significant procedures, OCA's and District Management's responsibilities
Observations	Findings noted during the audit and improvement recommendations related to the audit subject area
Appendices	Supplemental documents

We would like to thank all those who assisted the OCA in this compliance audit.

Respectfully Submitted,

/s/ Joris M. Jabouin

Joris M. Jabouin, CPA
Chief Auditor
Office of the Chief Auditor

EXECUTIVE SUMMARY

In accordance with the School Board of Broward County, Florida ("SBBC" or "District") Audit Plan for the 2023-2024 School/Fiscal Year, the Office of the Chief Auditor (OCA) conducted a compliance audit of the District's Behavioral Threat Assessment (BTA) Monitoring Plans for the School Year 2023-2024, Quarters 1 and 2. The audit covered monitoring plans that began in July 2023 through October 2023 and were tracked through December 2023.

The scope also included the requirement for monthly meetings of the school-based threat assessment teams. The requirements related to the implementation and review of monitoring plans are outlined in the District's Policy 4380, Behavioral Threat Assessment (BTA), amended on 6/13/2023 ("Policy") and the Behavioral Threat Assessment (BTA) 2023-2024 Procedures Manual, updated on 8/14/2023 ("Procedures"). Please refer to the "Attributes Tested" section for a detailed listing and references of the requirements reviewed. The audit was limited in scope to the documentation of ongoing analysis and monitoring of intervention services listed on the active monitoring plans initiated for the students during threat assessments.

The sample for review was selected based on a population of total substantive threat assessments – Very Serious and Serious – finalized from July 2023 through October 2023 for all schools, excluding charter schools. During this period, there were 101 substantive threats – 26 Very Serious and 75 Serious. 35 monitoring plans were selected for review, including 26 monitoring plans for all Very Serious threats and a judgmentally selected sample of 9 monitoring plans for Serious threats.

Each plan in the sample was tracked from the initial school/center location to the current school/center location if the student transferred within the District while the monitoring plan was active. The actual number of schools tested was 29. Documentation of plan reviews, intervention services, and the BTA team meetings was reviewed for each monitoring plan for the period from the plan's start date through December 22, 2023 (the last school day before winter break) or the date the plan was closed, whichever was earlier.

Summary of Results

The OCA determined that the schools complied with the requirements of the Policy and Procedures related to the monthly meetings of the school-based threat assessment teams (Attributes 3 and 4). However, errors were identified in the documentation of the monthly monitoring plan reviews (Attribute 1) as well as the documentation of the monitoring plan actions (Attribute 2).

The OCA noted an improvement from the prior audit findings for all attributes with errors. The summary of findings per attribute tested as well as the comparison of the results to the prior audit are included in Table 1.1 below. A detailed listing of the results of the current audit is included in the "Observations" section of this report.

Compliance Audit - Behavioral Threat Assessment Monitoring Plans
Internal Audit Report
Issued: April 11, 2024

Established 1915
BROWARD
County Public Schools

EXECUTIVE SUMMARY – Continued

Summary of Results – Continued

Table 1.1 contains the attributes that were tested in this audit for School Year 2023-2024, Quarters 1 and 2 ("SY 24 Q1-2") and their results as compared to the corresponding attributes from the last audit for School Year 2022-2023, Period 2 ("SY 23 P2"). The columns SY 23 P2 and SY 24 Q1-2 are the number of exceptions found for each attribute. The attribute numbers listed below have changed from the corresponding attribute numbers of the prior audit due to the limited scope of this audit. Please refer to the prior year's report for the prior audit attribute numbers.

Table 1.1

Coverage Periods			10/1/2022 - 3/12/2023 Sampled: 100 Very Serious: 50 Serious: 50		7/1/2023 - 12/22/2023 Sampled: 35 Very Serious: 26 Serious: 9		SY 24 Q1-2 Comments
		Attributes	SY 23 P2	% Failed SY 23 P2	SY 24 Q1-2	% Failed SY 24 Q1-2	
BTA Monitoring Plans	1	Was the Monitoring Plan reviewed (and updated when applicable) every month (or earlier if warranted)?	8	8%	2	6%	Out of 35 monitoring plans. For MP review, 2 MP were reviewed and closed, but the closure of MP was not documented
	2	Was the documentation maintained for all actions identified on the Monitoring Plan, when applicable?	43	43%	7	20%	For MP documentation, 1 had incomplete logs, 1 had inaccurate logs due to variances between Pinnacle and TERMS, 2 were a combination of incomplete logs and attendance variances, 1 combination of inaccurate logs and missing CPS referral, and 2 missing school-based counseling referrals.
BTA Team Meetings	3	Did the school-based BTA team meet at least monthly?			0	0%	
	4	Did the BTA team maintain documentation of their monthly meetings (dates and times, team members in attendance, cases discussed, and actions taken)?	2	3%	0	0%	Out of 29 schools.

OBJECTIVES

The purpose of this audit was to determine compliance with the BTA Policy and Procedures requirements, particularly related to the monthly meetings of the BTA teams and their ongoing analysis and monitoring of intervention services provided to the students who made a substantive threat. The review included monitoring plans initiated in July 2023 through October 2023 and their ongoing documentation from the initiation date through December 22, 2023, the last school day before winter break.

The specific objectives of this audit were to:

- Obtain an understanding of the requirements for the implementation and review of the monitoring plans for the period under review, emphasizing Policy and Procedure changes since the prior audit.

- Obtain an understanding of the District's systems and applications used to manage and document BTA monitoring plans and BTA team monthly meetings.

- Review written policy, procedures, established practices, and documentation thereof, and prepare a listing of detailed attributes for review.

- Review compliance with the requirements for the BTA team meetings and the ongoing analysis and documentation of active monitoring plans through the prepared attributes for 35 monitoring plans managed by 29 schools/centers.

- Determine whether improvements to the procedures and established practices are warranted and provide recommendations to District administration.

Compliance Audit - Behavioral Threat Assessment Monitoring Plans
Internal Audit Report
Issued: April 11, 2024

BROWARD
County Public Schools
Established 1915

BACKGROUND

The BTA process is governed in accordance with the District's Policy 4380. The Policy is updated when realignment with the Florida Statutes and/or clarifications are warranted. The last revision was approved on June 13, 2023. The subsequent revision of the Policy on December 12, 2023, was based on the new state requirements for the BTA procedures. However, due to the scope period for this audit ending in December 2023, the previous Policy version was used for this audit in conjunction with the Behavioral Threat Assessment (BTA) 2023-2024 Procedures Manual, updated on August 14, 2023.

The District's BTA records are maintained electronically using EdPlan software. When a threat is reported, the BTA teams must follow specific procedures and complete all components of the BTA in the EdPlan system. Diagram 1.1 below shows an overview of the BTA process utilized during the audit period.

Diagram 1.1

The **Monitoring Plan Implementation and Review** segment of this process is the subject of review in this audit. The OCA focused on this segment due to the high risk associated with the monitoring plans and a high failure rate identified for this segment in the prior audit.

The requirements specifically related to the implementation and review of monitoring plans are outlined in Sections III(J), IV(E), and V(F) of the Policy. Monitoring plans initiated 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. During the audit period, monitoring plans were required only for substantive threats – Very Serious and Serious.

The BTA teams are responsible for identifying intervention actions and services that require continued implementation and monitoring. Then, the BTA team must review and update, if necessary, every active monitoring plan at their location in their monthly meetings. Upon review of a student's monitoring plan, the team must determine whether to continue monitoring with or without revisions, or to close the monitoring plan. The school must document the date the plan was closed and the rationale in the student's risk assessment notes in EdPlan or in the BTA monthly meeting log. The documentation of the BTA monthly meetings is maintained using Navigate 360 Emergency Management Suite ("EMS") application. Schools are recommended to upload all supporting documentation of the monitoring plan actions into the EMS or EdPlan.

Compliance Audit - Behavioral Threat Assessment Monitoring Plans
Internal Audit Report
Issued: April 11, 2024

Established 1915
BROWARD
County Public Schools

SCOPE AND METHODOLOGY

The review was focused on the BTA teams' required meetings and their continuous analysis and monitoring of intervention services provided to the students who made substantive threats. The review included monitoring plans initiated between July 2023 and October 2023 and their ongoing documentation from the initiation date through December 22, 2023, the last school day before winter break. The scope of this audit did not include the review of the BTA documentation process – BTA Parts 1-3 as displayed in the Diagram 1.1 of the "Background" section. The OCA will test this process in future audits as part of the continuous reporting on the BTA Policy and Procedures.

During the audit period, monitoring plans were required only for Very Serious and Serious substantive threats. Therefore, the sample of monitoring plans was selected based on a population of total substantive threat assessments finalized in July 2023 through October 2023 for all schools, excluding charter schools. A total of 101 substantive threats were documented in EdPlan during this period, excluding charter schools and duplicates. There were no substantive threats documented in July 2023. Of the 101 substantive threats documented from August 2023 through October 2023, 26 were Very Serious and 75 were Serious threats. The OCA selected for review a total of 35 monitoring plans, including 26 monitoring plans for all Very Serious threats and a judgmentally selected sample of 9 monitoring plans for Serious threats.

The procedures used to satisfy the objectives in this review included the following:

- Reviewed the District's Policy and Procedures for the audit period.

- Met with the BTA department management to obtain an understanding of the procedures, established practices, and source of the documentation, including updates and changes since the prior audit.

- Completed BTA training and reviewed EdPlan training aids.

- Reviewed documentation recorded in and uploaded to the District's electronic data systems (EdPlan, TERMS, Basis, EMS) to determine compliance for the following:

  o BTA Monitoring Plans (Attributes 1 - 2) – if the plans were assessed every month and the identified actions were documented, when applicable.

  o BTA Team Monthly Meetings (Attributes 3 - 4) – if the BTA teams met at least monthly and the meetings were documented as required.

Compliance Audit - Behavioral Threat Assessment Monitoring Plans
Internal Audit Report
Issued: April 11, 2024

BROWARD
County Public Schools
Established 1915

SCOPE AND METHODOLOGY – Continued

- Obtained relevant documentation from each school when it was not uploaded to the electronic system.

- Prepared a written report on audit findings and observations. Reviewed the results with the schools and senior management and have incorporated management's responses into the audit report.

The review was conducted in accordance with Generally Accepted Government Auditing Standards. The standards require that the audit is planned and performed to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. The evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

The OCA is responsible for performing the review under Generally Accepted Government Auditing Standards and providing recommendations to improve operations, strengthen internal controls, and comply with the requirements of laws, rules, and regulations in matters selected for review. The administration is responsible for implementing corrective actions and complying with applicable laws, regulations, and School Board policies and procedures.

Audit supervised and reviewed by:

Joris Jabouin, Chief Auditor
Ali Arcese, Audit Director

Audit performed by:

Elena Pritykina, Audit Manager
Jeremiah Carter, Auditor

ATTRIBUTES TESTED

The following attributes were used to assess compliance with the the Policy and Procedures as referenced:

		Attributes	Policy 4380*	Manual Page Num**
BTA Monitoring Plans	1	Was the Monitoring Plan reviewed (and updated when applicable) every month (or earlier if warranted)?	s IV(E)	28
	2	Was the documentation maintained for all actions identified on the Monitoring Plan, when applicable?	s V(F)	29-30
BTA Team Monthly Meetings	3	Did the school-based BTA team meet at least monthly?	s III(J)	29
	4	Did the BTA team maintain documentation of their monthly meetings (dates and times, team members in attendance, cases discussed, and actions taken)?		

* SBBC Policy 4380, Behavioral Threat Assessment (BTA) (amended on 6/13/2023)
** BTA 2023-2024 Procedures Manual (updated on 8/14/2023)

Compliance Audit - Behavioral Threat Assessment Monitoring Plans
Internal Audit Report
Issued: April 11, 2024

BROWARD
County Public Schools
Established 1915

OBSERVATIONS

Observation	1. Monitoring Plan Review was not properly documented
High	Monitoring plans initiated during the BTA process identify the types of interventions the school-based BTA team deems appropriate to mitigate the risk of future violence and increase the likelihood of positive outcomes. The Monitoring Plan must be reviewed and updated when applicable every month or earlier if warranted, as required by Attribute 1 in the "Attributes Tested" section of this report. Upon review of a student's monitoring plan, the school-based BTA team must determine whether to continue monitoring with revisions, continue monitoring without revisions, or close the monitoring plan. When a decision is made to close an active monitoring plan, the school must document the date the plan was closed and the rationale in the student's risk assessment notes in EdPlan or in the BTA monthly meeting log. 2 (or 6%) of the 35 monitoring plans reviewed, were missing documentation of the plan's closure or the documentation did not include the date the plan was closed. A breakdown of the findings by school type is as follows: • 1 Middle School (Central Region) • 1 Center (Non-Traditional Area)
OCA Recommendation	The OCA recommends that the school Principals review BTA procedures and the training materials with staff and ensure that BTA procedures on documentation of reviews of active monitoring plans are followed without exception. The schools must document the date the plan was closed in the student's risk assessment notes in EdPlan or in the BTA monthly meeting log.
District Staff Response	<u>BTA Department Response</u> This attribute had a reduction in the failure rate from 8% to 6%. 100% of schools reviewed and updated the monitoring plans. The two samples that failed were due to the school not documenting that the plan was closed when the team decided to close it so the auditor could not validate the plan was actually closed. The BTA Department and the audit department reviewed the correct process for documenting when a SSMP is closed with the two schools that did not document the closing of the Monitoring Plan.

Observation	1. Monitoring Plan Review was not properly documented – Continued
District Staff Response – Continued	<u>BTA Department Response – Continued</u> Beginning in January of 2024, monthly TEAMS meetings are scheduled with the chairperson of the SBTMT to share best practices and review District expectations for threat management. <u>District Senior Management Responses</u> See Appendix II for consolidated responses from Chief Safety and Security Officer and Regional & Associate Superintendents
Completion Date	March 21, 2023

Observation	2. Monitoring Plan Actions were not properly documented
High	When the school-based BTA team identifies intervention actions that require continued implementation and monitoring, documentation must be maintained for all actions identified on the Monitoring Plan (when applicable), as required by Attribute 2 in the "Attributes Tested" section of this report. The BTA department recommends schools upload all supporting documentation for the monitoring plan actions into the EMS or EdPlan. However, schools may choose not to upload and instead keep such records on paper. 7 (or 20%) of the 35 monitoring plans reviewed, were either missing documentation for certain actions or the documentation was incomplete or inaccurate. A breakdown of the findings by school type is as follows: • 2 High Schools (South Region) • 5 Centers (Non-Traditional Area) The table below contains a breakdown of the findings for the 35 monitoring plans reviewed per the documentation type.

Daily or Weekly Check In Logs • 1 sample had inaccurate logs due to variances between Pinnacle and TERMs attendance records • 1 sample had a combination of inaccurate logs and missing logs for several days of the review period	2	6%
Daily Person/Possession Check Logs • 1 sample had missing logs for several days of the review period • 1 sample had inaccurate logs due to variances between Pinnacle and TERMs attendance records • 2 samples had a combination of inaccurate logs and missing logs for several days of the review period	4	11%
Referral to school-based Collaborative Problem Solving Team (CPST) • 1 sample was missing the documentation of the initial problem solving team meeting	1	3%
Referral for school-based counseling • 2 samples were missing documentation of the initial meeting with counselor	2	6%

Compliance Audit - Behavioral Threat Assessment Monitoring Plans
Internal Audit Report
Issued: April 11, 2024

Established 1915
BROWARD
County Public Schools

Observation	2. Monitoring Plan Actions were not properly documented – Continued
OCA Recommendation	The OCA recommends that school Principals review BTA procedures and the training materials with staff and ensure that BTA procedures for documenting active monitoring plan actions are followed without exception. The OCA recommends that the BTA department management make uploading the supporting documentation of monitoring plan actions to the electronic system a mandatory requirement.
District Staff Response	BTA Department Response This attribute had a decrease in the fail rate from the prior audit from 43% to 20%. For Monitoring Plan documentation, 1 school had an incomplete log, 1 school had an inaccurate log due to variances between Pinnacle and TERMS, 2 schools had a combination of an incomplete log and an attendance variance, 1 school had a combination of an incomplete log and missing Collaborative Problem-Solving Team (CPST) referral, and 1 school did not have documentation for the school-based counseling referral for two students. The BTA Department and the audit department reviewed the correct process for documenting the completion of actions listed in a Monitoring Plan. The department continues to support the District in remaining compliant with the requirements found in State Rule 6A-1.0019 for Student Support Management Plans. Members of the department attend the scheduled principal and assistant principal meetings to review protocols for threat management processes. Beginning January 1, 2024, the BTA Department has increased the level of oversight regarding the documentation of actions and is reviewing that schools are uploading the documentation into the Emergency Management Suite (EMS). Beginning in January of 2024, monthly TEAMS meetings are scheduled with the chairperson of the SBTMT to share best practices and review District expectations for threat management. The oversight and support the BTA Department provides schools ensures the fidelity of implementation with threat management processes and procedures. We will continue to ensure the fidelity of implementation with threat management in Broward County Public Schools. District Senior Management Responses See Appendix II for Consolidated Responses from Chief Safety and Security Officer and Regional & Associate Superintendents
Completion Date	March 21, 2023

![Broward County Public Schools logo - Established 1915]

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

April 2, 2024

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

FROM: Ernie Lozano, Director
               Behavioral Threat Assessment Department

SUBJECT: **RESPONSE TO BEHAVIOR THREAT ASSESSMENT INTERNAL AUDIT REPORT – 2023 - 2024 BTA Monitoring Plans Audit Q1 Q2 (PERIOD JULY 2023 THROUGH DECEMBER 2023)**

This correspondence comes as a response to the Office of the Chief Auditor Behavior Threat Assessment – 2023 – 2024 Monitoring Plans Audit Q1 Q2 Audit Report. The BTA Department is encouraged by the improvements from the prior audit in regard to the implementation and review of Monitoring Plans. The BTA Department will continue to monitor and support schools to ensure fidelity of implementation of Student Support Management Plans (SSMP), formerly called Monitoring Plans.

Attribute 1 focused on the review of active Monitoring Plans. This attribute had a reduction in the failure rate from 8% to 6%. 100% of schools reviewed and updated the monitoring plans. The two samples that failed were due to the school not documenting that the plan was closed when the team decided to close it so the auditor could not validate the plan was actually closed. The BTA Department and the audit department reviewed the correct process for documenting when a SSMP is closed with the two schools that did not document the closing of the Monitoring Plan.

Completion Date – March 21, 2023

Attribute 2 focused on the accurate documentation of the actions listed in the Monitoring Plan. This attribute had a decrease in the fail rate from the prior audit from 43% to 20%. For Monitoring Plan documentation, 1 school had an incomplete log, 1 school had an inaccurate log due to variances between Pinnacle and TERMS, 2 schools had a combination of an incomplete log and an attendance variance, 1 school had a combination of an incomplete log and missing Collaborative Problem-Solving Team (CPST) referral, and 1 school did not have documentation for the school-based counseling referral for two students. The BTA Department and the audit department reviewed the correct process for documenting the completion of actions listed in a Monitoring Plan.

Completion Date – March 21, 2023

Educating Today's Students to Succeed in Tomorrow's World
Broward County Public Schools is an Equal Opportunity Employer

13

Attributes 3 & 4 focused on the school-based teams meeting monthly and maintaining documentation of dates, times, team members in attendance, cases discussed, and actions taken. This attribute had a fail rate of 0%.

The findings in this audit validate the work of the BTA Department. The department continues to support the District in remaining compliant with the requirements found in State Rule 6A-1.0019 for Student Support Management Plans. Members of the department attend the scheduled principal and assistant principal meetings to review protocols for threat management processes. Beginning January 1, 2024, the BTA Department has increased the level of oversight regarding the documentation of actions and is reviewing that schools are uploading the documentation into the Emergency Management Suite (EMS). Beginning in January of 2024, monthly TEAMS meetings are scheduled with the chairperson of the SBTMT to share best practices and review District expectations for threat management. The oversight and support the BTA Department provides schools ensures the fidelity of implementation with threat management processes and procedures. We will continue to ensure the fidelity of implementation with threat management in Broward County Public Schools.

For additional information, please contact **Ernie Lozano, Director, Behavioral Threat Assessment Department by email at ernie.lozano@browardschools.com.**

Sincerely,

Ernie W. Lozano
Director, Behavioral Threat Assessment

EL:cm

Educating Today's Students to Succeed in Tomorrow's World
Broward County Public Schools is an Equal Opportunity Employer

14

APPENDIX II

BROWARD
County Public Schools
Established 1915

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

April 2, 2024

TO: Joris Jabouin
        Chief Auditor

FROM: Jaime Alberti
        Chief Safety and Security Officer

SUBJECT: **RESPONSE TO BEHAVIORAL THREAT ASSESSMENT INTERNAL AUDIT REPORT –**
            2023 - 2024 BTA MONITORING PLANS AUDIT Q1 Q2 (PERIOD JULY 2023 THROUGH
            DECEMBER 2023)

This correspondence comes as a response to the Office of the Chief Auditor Behavioral Threat Assessment – 2023 – 2024 Monitoring Plans Audit Q1 Q2 Audit Report. The Behavioral Threat Assessment (BTA) Department is encouraged by the improvements from the prior audit concerning the implementation and review of Monitoring Plans. The BTA Department will continue to monitor and support schools to ensure the fidelity of the implementation of Student Support Management Plans (SSMP), formerly known as Monitoring Plans.

In response to the BTA Department's 2023-2024 Monitoring Plans Audit for Q1 and Q2, we appreciate the recognition of the improvements made since the previous audit. The findings reflect the result of the continuous support that the BTA Department provides to the District.

Attribute 1
Under this attribute, the identified discrepancies in documenting the closure of the monitoring plans have been addressed. By revisiting and reinforcing the correct documentation process with the involved schools, we have provided further training and clarified expectations of how to properly document and close a Student Support Management Plan (SSMP).

Attribute 2
We have worked closely with schools to correct instances of incomplete or inaccurate logs, ensuring that actions listed in Monitoring Plans are thoroughly and accurately documented. This effort includes addressing discrepancies between attendance records and our District's recordkeeping database, along with ensuring that all required referrals are properly logged.

Attributes 3 & 4

Achieving a 0% fail rate in this area highlights our dedication to regular and well-documented meetings of School-Based Threat Management Teams (SBTMTs).

Educating Today's Students to Succeed in Tomorrow's World
Broward County Public Schools is an Equal Opportunity Employer

15

As we move forward, the BTA Department's increased oversight and the initiation of monthly team meetings with SBTMT chairpersons to share best practices and review District expectations for threat management provide an added level of internal communications that helps to provide opportunities for clarification. We remain dedicated to not only meeting but exceeding the expectations that will ensure the highest standards in school threat assessment practices.

For additional information, please contact **Jaime Alberti, Chief Safety and Security Officer, by email at jaime.alberti@browardschools.com.**

Sincerely,

Jaime Alberti
Chief Safety and Security Officer

Educating Today's Students to Succeed in Tomorrow's World
Broward County Public Schools is an Equal Opportunity Employer

16

ALAN STRAUSS, SOUTH REGIONAL SUPERINTENDENT
SOUTH REGION OFFICE

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

DATE: March 22, 2024

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

FROM: Alan Strauss, South Regional Superintendent
            South Region Office

SUBJECT: **2023-2024 BTA MONITORING PLANS AUDIT, Q1-Q2 (7/1/2023 - 12/22/2023)**

Please find this communication as a response to the Behavioral Threat Assessment Audit for the 7/1/2023 - 12/22/2023 period. 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 will assist in guiding our methodology as we monitor and provide support to our regional schools.

The South Regional Office Leadership Team will continue to work closely with the Behavioral Threat Assessment Department for guidance and updates on most current policies and procedures. 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 Behavioral Threat Assessment team. If the results of our finding 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 schools in the South Region. This audit report has provided tangible data evidence that will aid us in providing the appropriate support to our schools. If you need further information, please do not hesitate to reach out to me.

AS:mg

cc: South Region Leadership Team

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

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

PHONE: 754-321-3000   **EMAIL:** afulton@browardschools.com

DATE: March 22, 2024

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

FROM: Dr. Angela R. Fulton
             Central Regional Superintendent

SUBJECT: RESPONSE TO 2023-2024 BTA MONTORING PLANS AUDIT Q1-Q2

This correspondence serves to address the 2023-2024 Behavioral Threat Assessment Monitoring Plans Audit Q1-Q2 (7/1/23-12/22/23) period. We are happy to report that there was only one school in the Central Region with an audit finding; however, our goal is 100% compliance. Following a thorough review, my office acknowledges the response provided by the school's leadership. Rest assured; we are committed to providing the necessary support to prevent similar occurrences in the future.

The Central Regional Superintendent's Office reaffirms its dedication to prioritizing the Behavioral Threat Assessment process. We will utilize the findings and leadership responses from previous school year audits to guide our approach as we monitor and offer ongoing support to schools.

As a proactive measure, the Central Regional Leadership Team will convene quarterly meetings with the Behavioral Threat Assessment Department. These gatherings will serve to discuss trends, findings, and address any pertinent corrective actions. Additionally, Behavioral Threat Assessment topics will remain a standing item on our weekly staff meeting agenda.

In collaboration with the Behavioral Threat Assessment Team, we will continue to conduct regular analyses of school-specific behavioral threat assessment procedures and outcomes. Should our findings warrant, we are prepared to administer disciplinary actions to school leaders and engage in discussions concerning systems and training improvements.

The Central Regional Superintendent's Office is dedicated to addressing audit findings and implementing necessary changes as needed. If you have any questions or require additional information, please do not hesitate to contact me.

cc: Extended Cabinet Members
          Central Regional Leadership Team

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

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

April 2, 2024

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

FROM: Ted Toomer, Ed.D.
             Associate Superintendent, Non-Traditional Schools

SUBJECT: **2023-2024 BEHAVIORAL THREAT ASSESSMENT (BTA) MONITORING PLANS AUDIT,**
             Q1-Q2 (7/1/2023-12/22/2023)

Please find this communication as a response to the BTA Audit for the 7/1/2023 - 12/22/2023 period. My leadership team and I have reviewed the audit findings and action plans for the identified schools that received an audit exception. The Office of the Associate Superintendent, Non-Traditional Schools will continue to make the BTA process a priority. The findings, recommendations, and leadership responses will assist in guiding our methodology as we monitor and provide support to our regional schools.

The Office of the Associate Superintendent, Non-Traditional Schools Leadership Team will continue to work closely with the BTA Department for guidance and updates on most current policies and procedures. The BTA 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 BTA team. If the results of our finding 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 schools in the, Non-Traditional Region. This audit report has provided tangible data evidence that will aid us in providing the appropriate support to our schools. If you need further information, please do not hesitate to reach out to me.

TT:smr

c: Office of the Associate Superintendent, Non-Traditional Leadership Team

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

Policy 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 SHOULD 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 a 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** 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 must 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 staff/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 must be taken seriously, since the primary goal of threat assessment is the safety of all persons involved.

E. School-based BTA teams must 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 must ensure compliance with this policy.

B. Each school principal must 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. The principal will sign a verification form prior to the first day students return to school, verifying that every member of the school-based BTA Core Team has completed the mandatory training requirements.
   a. Per 6A-1.0018(10), F.A.C., those members appointed during the current 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) days 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, SaferWatch).

F. Parents of public-school students have a right to timely notification of threats, unlawful acts, and significant emergencies pursuant to 1006.07, Florida Statues. Such notifications must be made in accordance with the Family Educational Rights and Privacy Act (FERPA) and Section 1002.22, Florida Statutes.

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. A BTA must be initiated, 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 the BTA

is not initiated within 24 hours documentation must be entered into electronic management system explaining the extenuating circumstances. 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 must immediately refer the matter to law enforcement for evaluation, and the threat assessment team must initiate the threat assessment process no later than the end of the first day school is back in session. All BTAs must be finalized within 72 hours when school is in session. If the BTA is not finalized within 72 hours, documentation must be entered into electronic management system explaining the extenuating circumstances. School teams must complete a monitoring plan if applicable.

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 must 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 must ensure all District schools' timely report the information required by this paragraph by October 1 and report using the FSSAT. Beginning in the 2022-23 school year, the information submitted by each school threat assessment team must include the sex, race, and grade level of all students assessed by the threat assessment team.

SECTION IV: BTA TEAM RESPONSES

A. BTA team members (school-based CSTAG trained) must complete Student Risk Intake Form, 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 must 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.

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 should request and obtain criminal history record

information, pursuant to s.985.04(1).
   a. Any member of a BTA team must not 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 will **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 will 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 voicemail 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 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 must 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 must 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 within 3 business days or receipt of the identity of the new school and district of enrollment, whichever occurs first.

    i. Unfounded/no threat may not be maintained in the student's file unless one of the following conditions are met:

      • The parent of the student who was the subject of an

unfounded/no threat finding requests that the record be retained in the student's file.

  ii. The threat assessment team has made a determination that the unfounded/no threat finding must be retained in order to ensure the continued safety of the school community or to ensure the well-being of the student. Such determination and reasoning for maintaining the record must be document with the unfounded/no threat finding. When such a determination is made, the threat assessment team must re-evaluate the decision on an annual basis to determine if the record is no longer useful.

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 will 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 Safety, Security, and Emergency Preparedness,
Behavioral Threat Assessment

Policy Status: Active

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: 10/20/2020
     Amended: 5/17/2022, 6/13/2023

Behavioral Threat Assessment (BTA)

2023 – 2024 Procedure Manual

The School Board of Broward County, Florida

https://www.browardschools.com/bta

Last Updated as of August 14, 2023

The School Board of Broward County, Florida

2

Contents

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.

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)

5

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.

6

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)

<div align="center">

Threat Assessment Process

</div>

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 forms.
➢ 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.

8

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:

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

11

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 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). If a school requests participation of District staff or staff from another school location to participate in a Threat Assessment meeting, schools do not need to add the individual to the Principal Verification Form. Schools must verify that the individual selected must have completed CSTAG Level 2 training. School-based staff is defined as an individual who is listed on the school's location staffing report.

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) Forms (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

- ❑ Individuals with CSTAG Level 2 certificate will conduct Initial Student Interview, Target/Witness Interview(s) Form(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 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.

12

BTA PROCESS AT-A-GLANCE

RISK ASSESSMENT

❑ **The Student Risk Intake Form must be completed by a school administrator** or a member of the District's BTA Team during extenuating circumstances. A mental health professional can initiate and finalize the student risk intake form when it's both a threat to self and a threat to 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.

13

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 or a member of the District's BTA team during extenuating circumstances, using information from the individual(s) making the report. This form must be listed as a finalized document on the EdPlan Documents tab. The Intake Form can be completed by a mental health professional if initiated as a Suicide Risk Assessment.

Student Risk Intake Form

Information About the Incident
- ❑ Today's Date
- ❑ Who reported this initial concern?
  - o Reporter Name
  - o Affiliation to School
  - o Contact Number
- ❑ Who was this concern reported to?
  - o Name of Individual
  - o Affiliation to School
  - o 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

If a teacher/staff member is the target of the threat, the individual must complete Target/Witness Form and cannot be part of the BTA Core Team to determine threat level.

14

If an additional witness is identified after the intake form is finalized, the intake form does not have to be redone to include additional witnesses.

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.

15

❑ 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) Form(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

  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. If target of the threat, the individual cannot complete Teacher Input Form.

❑ *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 an individual with CSTAG Level 2 certificate (except law enforcement). **Law enforcement should not be conducting witness interviews.** All target/witness

16

interview forms must be documented in EdPlan. A mental health professional may also be present during this interview.

Please indicate the name of the individual(s) interviewed throughout the BTA process, name of interviewer(s), and date/time of interviews below. If the parent or student are unavailable for the interviews, please indicate all attempts to conduct the interviews and the reason the interview could not be conducted in the Risk Assessment Notes tab. Reach out to the BTA Office at 754-321-3550 to discuss next steps.

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 identified as a target must complete the Target/Witness Form and must not serve as a BTA team member to avoid conflict of interest issues and potential loss of objectivity. A CSTAG Level 2 trained team member should be selected to fill the role of the targeted 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 Forms (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. 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. BTA team members who have been threatened should serve as a witness and source of information (e.g., Target/Witness Interview Form, 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 with a CSTAG Level 2 certificate must be selected to fill the role of the targeted 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.

17

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 BTA Core 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.
- ❑ 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 Risk Assessment > Risk Assessment Student Notes Page 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 to 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 Student Risk Assessment > Risk Assessment Student Notes Page all attempts to conduct the required interview(s). Specify name of interviewer and date of interview attempted. If after multiple attempts, over a period of 3 days have been made to complete the interview(s), and these unsuccessful attempts have been documented in the Risk Assessment Student Notes Page, create, and finalize the corresponding interview document(s) with a note indicating why it could not be completed. Reach out to BTA Office for next steps, 754-321-3550.

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 (EdPlan Menu), the information must be entered 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), Target/Witness Interview(s) Form(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.

Please indicate the name of the individual(s) interviewed throughout the BTA process, name of interviewer(s), and date/time of interviews below. If the parent or student are unavailable for the interviews, please indicate all attempts to conduct the interviews and the reason the interview could not be conducted in the Risk Assessment Notes tab. Reach out to the BTA Office at 754-321-3550 to discuss next steps.

Clinical Interview are also required for all substantive threats:
❑ *Clinical Parent Interview* (**Required for Substantive threats; as needed for Unfounded/Transient threats**)

19

<u>The Clinical Parent Interview must be completed by a mental health professional</u> 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 in 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**)

<u>The Clinical Student Interview must be completed by a mental health professional</u> 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 in 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, target/witness form(s) 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 document 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). For all substantive threats, a Monitoring Plan must be finalized within 72 hours of the BTA being finalized. If unable to finalize the Monitoring Plan within 72 hours documentation must be completed in Risk Assessment Student Notes page.

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. Subjects admits to feeling angry toward target at time of incident.
    4. Subject retracts threat or denies intent to harm.
    5. Subject apologetic or willing to make amends for threat.
    6. Subject willing to resolve threat through conflict resolution or some other means.

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

Observations Suggesting Need for Intervention

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

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

Determination of Risk Level

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

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

23

❑ *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 of the student who made the alleged threat. 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.

Family Educational Rights and Privacy Act (FERPA)

The Behavioral Threat Assessment document is part of a student's educational record and is confidential under the Family Educational Rights and Privacy Act (FERPA).

For an imminent threat where there is an identified target(s) and there is a safety concern for the target's well-being, if disclosure of an education record is made without the parent's consent, the FERPA Disclosure Log must be completed by the BCPS staff member who makes the disclosure. Under FERPA, we may share student information in a health and safety emergency (34 CFR 99.31(10)). When we do so, we share only the information that is necessary to protect the health and/or safety of the student or other individuals (34 CFR 99.36(a)). The documented disclosure must speak specifically to the threat made against the target, the person the information was provided to, and the reason the information was shared.

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
  o Contact student's parents and/or guardian.
  o Additional responses, as determined by the threat assessment team.
  o If the threat assessment records were shared with Law Enforcement, please complete the FERPA log and contact Risk Management if clarification is needed.

❑ Transient
  o Contact student's parents and/or guardian.
  o If the intended target is a student, notify the intended target(s)'s parents and/or guardians. If the intended target is an adult, notify the intended target(s).
  o See that threat is resolved through explanation, apology, or making amends.
  o Follow discipline procedures as per Policies 5.8 and 5006, if applicable.
  o Additional responses, as determined by the threat assessment team.
  o If the threat assessment records were shared with Law Enforcement, please complete the FERPA log and contact Risk Management if clarification is needed.

❑ Serious Substantive
  o Contact student's parents and/or guardian.
  o If the intended target is a student, notify the intended target(s)'s parents and/or guardians. If the intended target is an adult, notify the intended target(s).
  o Provide direct supervision of student until parents and/or guardians assume control.
  o Caution the student about the consequences of carrying out the threat.
  o Conduct Clinical Parent Interview.
  o Conduct Clinical Student Interview.
  o Consult with SRO to assist in monitoring/supervising the student and determining need for law enforcement action. Document the name of the person who consulted with law enforcement, date, and the title of contact.
  o Screen the student for mental health services and counseling and refer the student for school-based or community-based services as needed.
  o Refer to CPS Team to determine need for academic/behavioral intervention and/or the need for psychological evaluation.

25

- For all substantive threats, a Monitoring Plan must be finalized within 72 hours of the BTA being finalized. If unable to complete Monitoring Plan on date of finalization documentation must be completed in Risk Assessment Student Notes page.
- 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.

❑ 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.
- For all substantive threats, a Monitoring Plan must be finalized within 72 hours of BTA being finalized. If unable to complete Monitoring Plan on date of finalization, documentation must be completed in Risk Assessment Student Notes page.
- 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

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 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.

26

❑ 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.

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 approximately 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 Risk Assessment Student Notes Page 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 has been finalized for all substantive threats, a Monitoring Plan must be finalized withing 72 hours of BTA being finalized. If unable to complete Monitoring Plan on date of finalization, documentation must be completed in Risk Assessment Student Notes page. 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.). Daily Persons Possession check is required for all Serious/Very Serious threats. A log must be maintained to document that checks occur daily. A log must begin the first day student returns to campus.
➢ Identify the names and titles of individuals who participated in the development of the Monitoring Plan.
➢ A Monitoring Plan must be completed within 72 hours of the BTA being finalized. If unable to complete within 72 hours, documentation must be completed in Risk Assessment Student Notes page.
➢ All participants who develop and finalize a monitoring plan must sign the signature page electronically or manually.
➢ 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).
➢ **All active monitoring plans must be reviewed and updated in the BTA monthly meeting. Discipline Centers and/or select schools approved by the BTA Department depending on the number of active Monitoring Plans will develop a process to ensure active monitoring plans are reviewed and updated monthly.**
➢ 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.
➢ **When a decision is made to close an active monitoring plan, the school must document the date the plan was closed and the rationale in the Risk Assessment Student Notes and/or BTA Monthly Meeting.**

Documenting the Closing of a Monitoring Plan

Document Monitoring Plan was closed under the Risk Assessment Student Notes Page and/or BTA Monthly Meeting.

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 Student Risk Assessment. A dropdown will appear and select Risk Assessment Student Notes
4. Press add a note on this page to open the panel to create a new note. Enter in the required information to add this note to the student's page
5. Enter person creating a note
6. Enter date and time

7. Enter outcome
8. Additional details can be added in the box

Note: The Risk Assessment Students Notes Page should only be used for BTA/SRA process notes and does not replace the existing process for documenting parent contacts.

BTA Monthly Meetings

Per state rule, all schools are required to conduct Behavioral Threat Assessment (BTA) Monthly Meetings. These meetings are required to be documented in the Emergency Management Suite (EMS). All monthly meetings for the 2023-2024 school year should be tentatively scheduled in EMS by August 18, 2023. A best practice is to schedule the meetings prior to the last week of the month to ensure compliance is met.

One representative on the BTA Core Team from each of the following (expert in curriculum/instruction, school administrator, mental health professional, and law enforcement) must be present at each monthly meeting. If a scheduled mandatory member of the meeting is unable to attend, a meeting must be held with this member to review the meeting minutes and the date and time. A copy of the minutes from the meeting needs to be signed and dated by the absent member and uploaded into EMS for verification. Every student currently on an Active Monitoring Plan and/or Safety Plan must be discussed during the BTA Monthly Meetings. If a decision is made to close a plan, the school must document the rationale for closing the plan in the Risk Assessment Student Notes section within EdPlan. Every school must conduct the first BTA Monthly meeting for the 2023 – 2024 school year on or before August 18, 2023. Schools must update all active Monitoring and/or Safety Plans by August 18, 2023. All supportive actions must be in place for full implementation on the first day of school, August 21, 2023.

During each BTA Monthly Meeting, the team needs to verify that all items selected on the monitoring plan have been implemented with fidelity.

Documentation of the BTA Meetings including date, time, members present, case discussed, and actions taken must be logged or uploaded in the EMS.

29

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.

➤ A Law Enforcement Officer is one of the four required participants on a Threat Assessment Team. During the process, the team evaluates the facts and determines the level of threat based on the information gathered. Under FERPA, the school is permitted to disclose this information to the Law Enforcement Officer without prior parental consent. If the Law Enforcement Officer who participated in the Threat Assessment process requests a copy of the document, this request should be recorded on the student's FERPA Disclosure Log. 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.
- For an imminent threat where there is an identified target(s) and there is a safety concern for the target's well-being, if disclosure of an education record is made without the parent's consent, the FERPA Disclosure Log must be completed by the BCPS staff member who makes the disclosure. Under FERPA, we may share student information in a health and safety emergency (34 CFR 99.31(10)). When we do so, we share only the information that is necessary to protect the health or safety of the student or other individuals (34 CFR 99.36(a)). The documented disclosure must speak specifically to the threat made against the target, the person the information was provided to, and the reason the information was shared.

31

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 Risk Assessment Students Notes Page.

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 Student Risk Assessment. A dropdown will appear and select Risk Assessment Student Notes
4. Press add a note on this page to open the panel to create a new note. Enter in the required information to add this note to the student's page
5. Enter person creating a note
6. Enter date and time
7. Enter outcome
8. Additional details can be added in the box

Note: The Risk Assessment Students Notes Page should only be used for BTA/SRA process notes and does not replace the existing process for documenting parent 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

District Resources & Contact Information

For the most current version of this manual, please access EdPlan and located at: https://www.browardschools.com/bta
For assistance with *EdPlan BTA Technical Support*:   Use **"Send Us a Message"** button on EdPlan (Envelope Icon next to name)   Call (754) 321-3550   Email BTASupport@browardschools.com
For assistance with *BTA district procedures*:   **Behavioral Threat Assessment Department**   Call (754) 321-3550   Email BTASupport@browardschools.com
For assistance with *school violence prevention:*   **Psychological Services** (754) 321-3440   **School Climate & Discipline** (754) 321-1655
For assistance with *FERPA Concerns/Questions*:   **SBBC Privacy Office** (754) 321-1914
For assistance with *DMS/discipline:*   **Equity, Diversity, & School Climate** (754) 321-1616
For assistance with *SRA/suicide prevention, Baker Acts*, *SEDNET referrals,* and *community mental health providers:*   **SEDNET** (754) 321-3421
For assistance with *SEL and counseling services:*   **Family Counseling** (754) 321-1590   **School Counseling** (754) 321-1675
For assistance with *substance abuse prevention:*   **Equity, Diversity, & School Climate** (754) 321-1600
For guidance regarding *school safety:*   **Special Investigative Unit (SIU School Police)** (754) 321-0725   **Safety, Security and Emergency Preparedness:** (754) 321-2655