



Policy 4380

BEHAVIORAL THREAT MANAGEMENT (BTM)

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 MANAGEMENT (BTM) 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 AND SET FORTH IN STATE BOARD OF EDUCATION RULE 6A-1.0019 – THREAT MANAGEMENT.

THE PURPOSE OF THIS POLICY IS TO SET FORTH REQUIREMENTS RELATING TO THREAT MANAGEMENT, A PROCESS BY WHICH SCHOOL DISTRICTS, K-12 SCHOOLS, CHARTER SCHOOL GOVERNING BOARDS, AND CHARTER SCHOOLS IDENTIFY, ASSESS, MANAGE, AND MONITOR POTENTIAL AND REAL THREATS TO STUDENT SAFETY.

SECTION I: DEFINITIONS

A. **“Florida Harm Prevention and Threat Management Model”** or **“Florida Model”** means the Florida-specific behavioral threat management process required by Section 1001.212(12), F.S. The Florida Model consists of the Florida Threat Management Manual and the Florida Harm Prevention and Threat Management Instrument (“Instrument”). Under the Florida Model, threats and reports of concerning behavior or concerning communications are categorized as having an unfounded, low, medium, or high level of concern.

B. **“School”** means a public K-12 school, including a charter school, with a Master School Identification Number (MSID) number as provided under Rule 6A-1.0016, F.A.C., but does not include:

1. Settings where instruction is provided in a county jail or state prison, in a Department of Juvenile Justice facility or program, in a hospital, or while a student is homebound;

2. Schools that provide only prekindergarten or adult education;
 3. Technical centers under Section 1004.91, F.S. A list of schools meeting this definition will be provided to the School Safety Specialists by December 1, 2023, and annually thereafter by July 1.
- C. **“School-based mental health services provider”** means a school psychologist certified under Rule 6A-4.0311, F.A.C., a school social worker certified under Rule 6A-4.035, F.A.C., a school counselor certified under Rule 6A-4.0181, F.A.C., or a mental health professional licensed under Chapter 490 or 491, F.S., who is employed or contracted by a district or school to provide mental health services in schools.
- D. **“School district”** or **“district”** means a Florida school district, the Florida Virtual School (Section 1002.37, F.S.), the Florida School for the Deaf and the Blind (Section 1002.36, F.S.), Developmental Research (Laboratory) Schools (Section 1002.32, F.S.), and charter schools sponsored by a university or Florida College System institution (Section 1002.33(5), F.S.).
- E. **“Student Support Management Plan”** or **“SSMP”** means an ongoing intervention and monitoring plan implemented by the school-based threat management team. The SSMP may impose requirements on a student of concern for a defined period of time based on the level of concern. The SSMP is reviewed each month by the School Based Threat Management Team (SBTMT).
- F. **“Threat Assessment”** means the identification of individuals exhibiting threatening or other concerning behavior.
- G. **“Threat Management”** means the multipart process by which schools identify individuals exhibiting threatening or other concerning behavior, assess the risk of harm, and coordinate appropriate interventions and services for such individuals, as provided in Section 1006.07(7), F.S.

SECTION II: NOTIFICATIONS

- A. Parental notification is required in the following circumstances and must adhere to the timelines set forth in Rule 6A-1.0019:
1. If the SBTMT Chair determines the report of a concerning behavior or threat is a Low level of concern and summarily closes the case, the Chair or designee must notify the parent or guardian of the student of concern before the end of the school day.
 2. If the Chair does not summarily close the case and refers it to the SBTMT, reasonable efforts must be made to notify the student of concern’s parent or guardian on the same day the SBTMT assigns the preliminary level of concern.
 3. If the preliminary level of concern is High, there must be an immediate attempt by the chairperson of the SBTMT to notify the parent/guardian of the student of concern before the end of the school day.

4. Parents or guardians must also be notified if the threat management process reveals information about their student's mental, emotional, or physical health or well-being, or results in a change in related services or monitoring, including but not limited to implementation of an SSMP.
 5. Once an SSMP is finalized and anytime it is substantively revised, the SBTMT Chair or designee must provide a copy of the SSMP to the student of concern's parent or guardian. The targeted student's parent or guardian should also be informed that an SSMP has been implemented.
 6. Where a report of concern includes an identified student target, the Chair must make a reasonable effort to notify the parent or guardian of the targeted student before the end of the school day that the report was received unless the Chair has determined the concern is unfounded. As provided for in the Florida Harm Prevention and Threat Management Manual (Form OSS-001), the unfounded summary disposition should only be used when it is clear and articulable that there is no basis for concern. If there is any doubt, the case should be forwarded to the School Based Threat Management Team for further evaluation and parent notification should occur. Nothing herein prevents the school from notifying parents or guardians if they believe it is in the best interest of the student.
- B. "Reasonable effort to notify" means the exercise of reasonable diligence and care to make contact with the student's parent or guardian, typically through the contact information shared by the parent or guardian with the school or school district. The SBTMT Chair or designee must document all attempts to make contact with the parent or guardian.
- C. Timelines for required notice may be modified where the SBTMT reasonably believes and documents that such disclosure would result in abuse, abandonment, or neglect, as defined in Section 39.01, F.S.
- D. Education records. Threat assessments and records related to threat management are considered education records as defined by the Family Educational Rights and Privacy Act (FERPA) and Sections 1002.22 and 1002.221, Florida Statutes. Policies relating to access, maintenance, and retention of these records must be consistent with Rule 6A-1.0955, F.A.C., Education Records.

SECTION III: DISTRICT THREAT MANAGEMENT COORDINATOR

- A. District Threat Management Coordinator (DTMC). The superintendent shall designate a Threat Management Coordinator to oversee threat management at all public K-12 schools, including charter schools sponsored by or under contract with the district.
1. The DTMC must:
 - a. Ensure that all district-level and school-level threat management team personnel are trained in threat management and on the Florida Model.

- b. Serve as Chair of the District Threat Management Team and as the liaison to the Department of Education's Office of Safe Schools ("Office"); and
 - c. Assist School Based Threat Management Teams in the district.
- 2. The superintendent shall report the name, phone number, and email address of the District Threat Management Coordinator to the Office at FloridaModel@fldoe.org. This information must be reported annually by July 1, and must be updated within one (1) school day if there is a change in the information provided.

SECTION IV: DISTRICT THREAT MANAGEMENT TEAM (DTMT) & SCHOOL BASED THREAT MANAGEMENT TEAMS (SBTMT)

- A. **District Threat Management Team (DTMT).** The superintendent shall designate a District Threat Management Team that will receive referrals from the School Based Threat Management Teams, assess serious situations, and provide support to school-based teams, including charter schools in their district. The DTMT must include the District Threat Management Coordinator as Chair, persons from school district administration and persons with expertise in counseling, instruction, and law enforcement.
- B. **School Based Threat Management Team (SBTMT).** Each school must have an SBTMT comprised of four (4) members, at a minimum, including persons with expertise in counseling, instruction, school administration, and law enforcement. The principal or equivalent administrative head of the school is responsible for appointing team members. The SBTMT must also include a member with personal knowledge of the student of concern who is the subject of threat management. Team members must meet the following requirements:
 - 1. The **counseling team member** must be a school-based mental health services provider that is able to access student mental health records.
 - 2. The **instructional team member** must meet the definition of instructional personnel under Section 1012.01(2)(a)-(d), F.S., or must hold a current Florida Educator Certificate under Section 1012.56, F.S.
 - 3. The **school administrator team member** must meet the definition of administrative personnel found in Section 1012.01(3), F.S. This should not be the school principal, or equivalent, unless they are the only administrator at the school.
 - 4. The **law enforcement team member** must be a sworn law enforcement officer, as defined by Section 943.10(1), F.S., including a School Resource Office, school-safety officer, or other active law enforcement officer. At a minimum, a law enforcement officer serving on a threat management team must have access to local Records Management System information, the Criminal Justice Information System, and the Florida Crime Information

Center and National Crime Information Center databases. Officers serving on school-based threat management teams must also have clearance to review Criminal Justice Information and Criminal History Record Information.

- a. A school guardian, as defined under Section 1006.12(3), F.S., or a school security guard, as defined under Section 1006.12(4), F.S., may not serve as the law enforcement member of a threat management team.
5. If none of the team members are familiar with the student of concern, the SBTMT Chair must assign a member of the school's staff who is familiar with the student to consult with and provide background information to the threat management team. The person must be instructional or administrative personnel, as defined in Section 1012.01(2) and (3), F.S. Consulting personnel do not have to complete Florida Model training and may not participate in the decision-making process.
6. **Threat Management Chair and Vice Chair.** The principal of each school must appoint a Chair and Vice Chair of the SBTMT. The Chair serves as the point person for threat management at the school-level and is responsible for triaging reported threats or concerning behavior and communications to determine whether the matter should be summarily closed or whether it should be reviewed by the full SBTMT.
7. **Instrument.** Each SBTMT and DTMT must use the Florida Model to assess the behavior of students who may pose a threat of harm to themselves or others and to coordinate intervention and services for such students. All reported threats or concerning behaviors and communications, even those determined to be unfounded, must be documented by the SBTMT in the required electronic platform along with any resultant action, using the Florida Model Instrument. The chairperson must complete the Intake and Disposition Form, assess the concern for factual basis, and decide whether to convene the SBTMT as soon as possible but no later than the next school day from the day the initial report was received by the chairperson.
 - a. For levels of concern that are preliminarily determined to be low by the SBTMT, in addition to the requirements outlined in the Florida Harm Prevention and Threat Management Manual the following must be completed by an individual that completed the Day 1 Florida Model training-
 1. Initial Interview with student of concern
 2. Initial Interview of student of concern's parent/guardian
 3. Target/Witness interviews
 4. Review of student background information including attendance and academic history
 5. The teacher/staff questionnaire must be sent to all of the student's current teachers to be completed and returned prior to final disposition meeting. If a teacher is unavailable to complete the form, the team will

proceed to make a final level of concern determination without the questionnaire.

b. For levels of concern that are preliminarily determined to be medium by the SBTMT, in addition to the requirements outlined in the Florida Harm Prevention and Threat Management Manual the following must be completed by an individual that completed the Day 1 Florida Model training-

1. Initial Interview with student of concern
2. Initial Interview of student of concern's parent/guardian
3. Target/Witness interviews
4. Review of student background information including attendance and academic history
5. For events involving the possession or use of a weapon, a Daily Person/Possession Check must be implemented (remains in place for the duration of the active SSMP)

c. For levels of concern determined to be medium, the following actions must be implemented and documented in the final SSMP:

1. For events involving the possession or use of a weapon, a Daily Person/Possession Check must be implemented (remains in place for the duration of the active SSMP)
2. Referral to Social Worker

3. The teacher questionnaire must be sent to the student's current teachers to be completed and returned prior to final disposition meeting. If a teacher is unavailable to complete the form, the team will determine without the questionnaire.

d. For levels of concern that are preliminarily determined to be high by the SBTMT, in addition to the requirements outlined in the Florida Harm Prevention and Threat Management Manual, the following must be completed by an individual that completed the Day 1 Florida Model training-

1. Initial Interview with student of concern
2. Initial Interview of student of concern's parent/guardian
3. Target/Witness interviews
4. Review of student background information including attendance and academic history
5. Interim Student Support Management Plan (SSMP)
6. Mental Health Parent/Guardian Interview
7. Mental Health Student of Concern Interview

8. The teacher/staff questionnaire must be sent to all of the student's current teachers to be completed and returned prior to final disposition meeting. If a teacher is unavailable to complete the form, the team will proceed to make a final level of concern determination without the questionnaire.

e. For levels of concern preliminarily determined to be high, the

following actions must be implemented and documented in the interim SSMP:

1. Daily Person/Possession Check (remains in place for the duration of the active SSMP)
2. No backpack allowed (remains in place for the duration of the active SSMP)
3. Additional bag(s) (lunch, athletic, etc.) are not allowed unless approved by the school principal (remains in place for the duration of the active SSMP)

f. For levels of concern determined to be high, the following actions must be implemented and documented in the final SSMP:

1. Daily Person/Possession Check (remains in place for the duration of the active SSMP)
2. Referral to school-based Collaborative Problem Solving Team
3. No backpack allowed (remains in place for the duration of the active SSMP)
4. Additional bag(s) (lunch, athletic, etc.) are not allowed unless approved by the school principal (remains in place for the duration of the active SSMP)
5. Referral to Social Worker

8. **Meetings.** Each SBTMT must meet as often as needed to fulfill its duties of assessing and intervening with students whose behavior may pose a threat of harm to themselves or others, but no less than monthly.

- a. Threat management teams must maintain documentation of their meetings, including meeting dates team members in attendance, cases discussed, and actions taken.
- b. DTMTs must meet as needed to review and consult with SBTMTs and must meet timeframes set forth in the Florida Threat Management Manual.

C. Referrals to Mental Health Services. The department of Student Services shall notify all school personnel who have received training pursuant to Section 1012.584(4), F.S., of mental health services, including referrals for self-harm consistent with Section 394.463, F.S., that are available in the school district and the individual to contact if a student needs services. The term “mental health services” includes, but is not limited to, community mental health services, health care providers, and services provided under ss.1006.04.

D. District Mental Health Coordinator. The District Mental Health Coordinator will track all students with a high level of concern.

SECTION V: TRAINING

- A. All members of SBTMTs and DTMTs must be trained on the Florida Model through training provided by or approved by the Office of Safe Schools, as follows:
 - 1. All SBTMT and DTMT members must complete basic Florida Model training.
 - 2. The District Threat Management Coordinator must complete additional training specific to the Coordinator role.
 - 3. School principals, the Threat Management Chair, and the Vice Chair must complete additional training specific to their respective roles.
- B. District and school-level teams must be designated before the start of the school year. Team members who have not previously completed training must complete Florida Model training before the start of the school year. Those appointed to threat management teams after the start of the school year must complete Florida Model training within thirty (30) school days of appointment to the School-based Threat Management Team.
- C. District and school-level team members who have been fully trained in a previous school year must complete an annual refresher training provided by the Office of Safe Schools within the first sixty (60) days of school.
- D. Charter Schools. Charter schools are responsible for establishing SBTMTs and conducting threat assessments as required by Rule 6A-1.0019. DTMCs and DTMTs must oversee and support charter schools sponsored by or under contract with the district to the same extent they do for traditional public schools.
- E. Virtual Schools. Virtual schools are responsible for establishing SBTMTs and conducting threat assessments as required by Rule 6A-1.0019.

SECTION VI: TRANSFER OF RECORDS

- A. Upon the student's transfer to a different school, the threat management team of the transferring school will maintain responsibility for the student on an SSMP until responsibility is formally accepted by the receiving school.
- B. The transfer of records must occur within 5 school days of receipt of the request for records from the new school or district, or the receipt of the identity of the new school and district of enrollment, whichever occurs first. The records must include, if applicable:
 - 1. Verified reports of serious or recurrent behavior patterns, including any threat assessment report, all corresponding documentation, and any other information required by the Florida-specific behavioral threat assessment instrument pursuant to s. 1001.212(12) which contains the evaluation, intervention, and management of the threat assessment evaluations and intervention services.
 - 2. Psychological evaluations, including therapeutic treatment plans and therapy or progress notes created or maintained by school district or charter school staff, as appropriate.
- C. Documentation of unfounded level of concerns must not be transferred unless:

1. The parent of the student the subject of an unfounded level of concern finding requests that the records be maintained in the student's file; or
2. The School Based Threat Management Team made the determination that the unfounded level of concern finding must be retained to ensure the continued safety of the school community or to ensure the well-being of the student.

SECTION VII: ADHERENCE TO FLORIDA DEPARTMENT OF EDUCATION OFFICE OF SAFE SCHOOLS' POLICIES AND PROCEDURES

- A. The Superintendent, in conjunction with the District Threat Management Coordinator, principals, assistant principals, chairpersons, vice chairpersons, and members of the SBTMT shall implement the Florida Department of Education Office of Safe School's (OSS) Florida Harm Prevention and Threat Management Instrument and Florida Harm Prevention and Threat Management Manual, hereby incorporated by reference, as may be amended by OSS from time to time, consistent with the policies and procedures of OSS.

SECTION VIII: AUDITS

- A. The Chief Auditor will conduct annual audits in compliance with this policy as directed by the School Board and report findings to Audit Committee and the School Board.

SECTION IX: Providing Guidance to Students, Faculty, and Staff

- A. **Students.** All students will be oriented within the first ten days school is in session on recognizing concerning behaviors or threats and will be informed to whom concerning behaviors and threats should be reported, pursuant to Section 1006.07(7)(c), F.S. Schools must use the content provided by the District Behavioral Threat Management Department to conduct the orientation.
- B. **Faculty & Staff.** All School Board Employees, including Charter Schools in Broward County, will be oriented through the required Warning Signs training. All school-based staff will complete an additional orientation prior to the first day school is in session on recognizing concerning behaviors or threats and will be informed to whom concerning behaviors and threats should be reported, pursuant to Section 1006.07(7)(c), F.S. Each school will utilize the All-Staff Training For the Masses PowerPoint provided by the Office of Safe Schools (OSS) to orient school-based staff.

Policy Custodian: Office of Safety, Security, and Emergency Preparedness

Authority: 20 U.S.C. §1232g; F.S. §§120. 52(6), 120.54, 120.81(1)(a), 1001.41(1) and (2), 1001.42(28), F.A.C. Rules 6A-1.0018, 6A-1.0019

Laws Implemented:, 34 C.F.R. §99, F.S. §§ 394.463, 1001.212(12), 1002.22, 1002.221, 1003.25, 1006.04 1006.07(7), 1012.584, F.A.C. Rule 6A-1.0955

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