

**IASB POLICY REFERENCE MANUAL  
TABLE OF CONTENTS  
SECTION 4 - OPERATIONAL SERVICES**

Fiscal and Business

4:10	Fiscal and Business Management
4:15	Identity Protection
4:15-AP	Administrative Procedure - Protecting the Privacy of Social Security Numbers
4:15-E1	Exhibit - Letter to Employees Regarding Protecting the Privacy of Social Security Numbers
4:15-E2	Exhibit - Statement of Purpose for Collecting Social Security Numbers
4:15-E3	Exhibit - Statement for Employee Manual or District Website Describing the District's Purpose for Collecting Social Security Numbers
4:20	Fund Balances
4:30	Revenue and Investments
4:40	Incurring Debt
4:40-AP	Administrative Procedure - Preparing and Updating Disclosures
4:45	Insufficient Fund Checks and Debt Recovery
4:45-AP1	Administrative Procedure - Insufficient Fund Checks
4:45-AP2	Administrative Procedure - Local Debt Recovery Program Implementation Procedures
4:45-E1	Exhibit - Cover Page Documenting the Process to Seek Offset from the Illinois Office of the Comptroller
4:45-E2	Exhibit - Notice of Claim and Intent to Seek Debt Recovery; Challenge; and Response to Challenge
4:50	Payment Procedures
4:50-E	Exhibit - School District Payment Order
4:55	Use of Credit and Procurement Cards
4:55-AP	Administrative Procedure - Controls for the Use of District Credit and Procurement Cards
4:55-E	Exhibit - Cardholder's Statement Affirming Familiarity with Requirements for Using District Credit and/or Procurement Cards
4:60	Purchases and Contracts
4:60-AP1	Administrative Procedure - Purchases
4:60-AP2	Administrative Procedure - Third Party Non-Instructional Contracts
4:60-AP3	Administrative Procedure - Criminal History Records Check of Contractor Employees

- 4:60-AP4 Administrative Procedure - Federal Award Procurement Procedures
- 4:60-AP4, E1 Exhibit - Internal Procedures for Procurement Transactions
- 4:60-E Exhibit - Notice to Contractors
- 4:70 Resource Conservation
- 4:70-AP Administrative Procedure - Resource Conservation
- 4:80 Accounting and Audits
- 4:80-AP1 Administrative Procedure - Checklist for Internal Controls
- 4:80-AP2 – Administrative Procedure - Fraud, Waste, and Abuse Awareness Program
- 4:90 Activity Funds
- 4:100 Insurance Management

Operations

- 4:110 Transportation
- 4:110-AP1 Administrative Procedure - School Bus Post-Accident Checklist
- 4:110-AP2 Administrative Procedure - Bus Driver Communication Devices; Pre-Trip and Post-Trip Inspection; Bus Driving Comments
- 4:110-AP3 Administrative Procedure - School Bus Safety Rules
- 4:110-E Exhibit - Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses
- 4:120 Food Services
- 4:120-AP Administrative Procedure - Food Services; Competitive Foods; Exemptions
- 4:130 Free and Reduced-Price Food Services
- 4:130-E Exhibit - Free and Reduced-Price Food Services; Meal Charge Notifications
- 4:140 Waiver of Student Fees
- 4:140-AP Administrative Procedure - Fines, Fees, and Charges - Waiver of Student Fees
- 4:140-E1 Exhibit - Application for Fee Waiver
- 4:140-E2 Exhibit - Response to Application for Fee Waiver, Appeal, and Response to Appeal
- 4:140-E3 Exhibit - Resolution to Increase Driver Education Fees
- 4:150 Facility Management and Building Programs
- 4:160 Environmental Quality of Buildings and Grounds
- 4:160-AP Administrative Procedure - Environmental Quality of Buildings and Grounds

Safety and Security

- 4:170 Safety
- 4:170-AP1 Administrative Procedure - Comprehensive Safety and Security Plan

- 4:170-AP1, E1 Exhibit - Accident or Injury Form
- 4:170-AP1, E2 Exhibit - Memo to Staff Members Regarding Contacts by Media About a Crisis
- 4:170-AP2 Administrative Procedure - Routine Communications Concerning Safety and Security
- 4:170-AP2, E1 Exhibit - Letter to Parents/Guardians Regarding Student Safety
- 4:170-AP2, E2 Exhibit - Letter to Parents/Guardians Regarding ~~Educational Programs About~~ the Dangers of Underage Drinking
- 4:170-AP2, E3 Exhibit - Letter to Parents/Guardians About Disruptive Social Media Apps; Dangers
- 4:170-AP2, E4 Exhibit - Letter to Parents/Guardians About Preventing and Reducing Incidences of Sexting
- 4:170-AP3 **OPEN**
- 4:170-AP4 Administrative Procedure - National Terrorism Advisory System
- 4:170-AP5 Administrative Procedure - Unsafe School Choice Option
- 4:170-AP6 Administrative Procedure - Plan for Responding to a Medical Emergency at a Physical Fitness Facility with an AED
- 4:170-AP6, E1 Exhibit - School Staff AED Notification Letter
- 4:170-AP6, E2 Exhibit - Notification to Staff and Parents/Guardians of CPR and AED Video
- 4:170-AP7 ~~OPEN~~ [Administrative Procedure - Targeted School Violence Prevention Program](#)
- 4:170-AP7, E1 ~~OPEN~~ [Exhibit - Threat Assessment Decision Tree](#)
- 4:170-AP7, E2 ~~OPEN~~ [Exhibit - Threat Assessment Documentation and Response](#)
- 4:170-AP7, E3 ~~OPEN~~ [Exhibit - Targeted School Violence Prevention and Threat Assessment Education](#)
- 4:170-AP8 Administrative Procedure - Movable Soccer Goal Safety
- 4:175 Convicted Child Sex Offender; Screening; Notifications
- 4:175-AP1 Administrative Procedure - Criminal Offender Notification Laws; Screening
- 4:175-AP1, E1 Exhibit - Informing Parents/Guardians About Offender Community Notification Laws
- 4:180 Pandemic Preparedness
- 4:180-AP1 Administrative Procedure - School Action Steps for Pandemic Influenza
- 4:180-AP2 Administrative Procedure - Pandemic Influenza Surveillance and Reporting
- [4:190 Targeted School Violence Prevention Program](#)
- [4:190-AP1 Administrative Procedure - Targeted School Violence Prevention Program](#)
- [4:190-AP1, E1 Exhibit - Targeted School Violence Prevention Program Resources](#)

[4:190-AP2 Administrative Procedure - Threat Assessment Team \(TAT\)](#)

[4:190-AP2, E1 Exhibit - Principles of Threat Assessment](#)

[4:190-AP2, E2 Exhibit - Threat Assessment Documentation](#)

[4:190-AP2, E3 Exhibit - Threat Assessment Key Areas and Questions; Examples](#)

[4:190-AP2, E4 Exhibit - Responding to Types of Threats](#)

[4:190-AP2, E5 Exhibit - Threat Assessment Case Management Strategies](#)

[4:190-AP2, E6 Exhibit - Targeted School Violence Prevention and Threat Assessment Education](#)

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## Operational Services

### Revenue and Investments 1

#### Revenue

The Superintendent or designee is responsible for making all claims for property tax revenue, State Aid, special State funds for specific programs, federal funds, and categorical grants.

#### Investments

The Superintendent shall either appoint a Chief Investment Officer or serve as one.<sup>2</sup> The Chief Investment Officer shall invest money that is not required for current operations, in accordance with this policy and State law.<sup>3</sup>

The Chief Investment Officer and Superintendent shall use the standard of prudence when making investment decisions. They shall use the judgment and care, under circumstances then prevailing, that persons of prudence, discretion, and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the safety of their capital as well as its probable income.<sup>4</sup>

#### Investment Objectives 5

The objectives for the School District's investment activities are:

1. Safety of Principal - Every investment is made with safety as the primary and over-riding concern. Each investment transaction shall ensure that capital loss, whether from credit or market risk, is avoided.
2. Liquidity - The investment portfolio shall provide sufficient liquidity to pay District obligations as they become due. In this regard, the maturity and marketability of investments shall be considered.
3. Rate of Return - The highest return on investments is sought, consistent with the preservation of principal and prudent investment principles.
4. Diversification - The investment portfolio is diversified as to materials and investments, as appropriate to the nature, purpose, and amount of the funds.

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<sup>1</sup> Each district must have an investment policy ~~(30 ILCS 235/2.5)~~; its detail and complexity must be appropriate to the nature of the funds, the funds' purpose, and the amount of the public funds within the investment portfolio. [30 ILCS 235/2.5\(a\)](#).

<sup>2</sup> 30 ILCS 235/2.5(a)(7). Districts having a chief business official may use this alternative: "The Chief Business Official shall serve as the District's Chief Investment Officer." If a Township Treasurer manages the district funds, substitute this sentence: "

The Township Treasurer shall serve as the Chief Investment Officer."<sup>2</sup>

<sup>3</sup> Township and school treasurers are authorized by 105 ILCS 5/8-7 to enter into agreements regarding the deposit, investment, and withdrawal of district funds.

<sup>4</sup> The policy must include a standard of care. ~~(30 ILCS 235/2.5(a)(2))~~.

<sup>5</sup> The policy must address safety, liquidity, return (30 ILCS 235/2.5(a)), as well as diversification (30 ILCS 235/2.5(a)(4)). These objectives also serve as investment guidelines. ~~(30 ILCS 235/2.5(a)(3))~~. How these are addressed is at the board's discretion.

## Authorized Investments 6

The Chief Investment Officer may invest District funds in one or more of the following:

1. Bonds, notes, certificates of indebtedness, treasury bills, or other securities now or hereafter issued, that are guaranteed by the full faith and credit of the United States of America as to principal and interest.
2. Bonds, notes, debentures, or other similar obligations of the United States of America, its agencies, and its instrumentalities.

The term “agencies of the United States of America” includes: (a) the federal land banks, federal intermediate credit banks, banks for cooperative, federal farm credit banks, or any other entity authorized to issue debt obligations under the Farm Credit Act of 1971 and Acts amendatory thereto, (b) the federal home loan banks and the federal home loan mortgage corporation, and (c) any other agency created by Act of Congress.

3. Interest-bearing savings accounts, interest-bearing certificates of deposit or interest-bearing time deposits or any other investments constituting direct obligations of any bank as defined by the Illinois Banking Act.
4. ~~Short-term~~ Obligations of corporations organized in the United States with assets exceeding \$500,000,000 if: (a) such obligations are rated at the time of purchase at one of the ~~three~~ highest classifications established by at least ~~two~~ standard rating services and that mature not later than ~~270-three years~~ days from the date of purchase, (b) such purchases do not exceed 10% of the corporation’s outstanding obligations, and (c) no more than one-third of the District’s funds may be invested in short term obligations of corporations.
5. Money market mutual funds registered under the Investment Company Act of 1940, provided that the portfolio of any such money market mutual fund is limited to obligations described in paragraph (1) or (2) and to agreements to repurchase such obligations.
6. Interest-bearing bonds of any county, township, city, village, incorporated town, municipal corporation, school district, the State of Illinois, any other state, or any political subdivision or agency of the State of Illinois or any other state, whether the interest earned is taxable or tax-exempt under federal law. The bonds shall be (a) registered in the name of the municipality, county, or other governmental unit, or held under a custodial agreement at a bank, and (b) rated at the time of purchase within the ~~four~~ highest general classifications

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<sup>6</sup> The policy must contain a “listing of authorized investments.” (30 ILCS 235/2.5(a)(1). 30 ILCS 235/2(a-1), ~~amended by P.A. 98-297, now~~ allows school districts to invest public funds in interest-bearing bonds of any local government (see paragraph 6). Investments from which a board may choose are ~~all~~ listed in this policy. (See 30 ILCS 235/2, ~~amended by P.A. 100-752~~). Alternatively, a board may refer to that law by stating: <sup>22</sup>

The Chief Investment Officer may invest any District funds in any investment as authorized in 30 ILCS 235/2, and Acts amendatory thereto.<sup>22</sup>

~~Some attorneys are of the opinion that the Investment of Municipal Funds Act (IMFA) (50 ILCS 340/) authorizes school districts to invest funds in certain tax anticipation warrants. The IMFA applies to counties, park districts, sanitary districts, and other municipal corporations. Id. at 340/1. Municipal corporation is not specifically defined in the IMFA. Consult with the board attorney and/or bond counsel regarding the authority for such investments and the inclusion of the IMFA in this policy.~~

As part of its mission to protect public entities, the Municipal Securities Rulemaking Board (MSRB) has ~~the following~~ resources available that school officials may find helpful:

~~A State and Local Government Toolkit at: [www.msrb.org/EducationCenter/Issuers/Issuing.aspx](http://www.msrb.org/EducationCenter/Issuers/Issuing.aspx) [www.msrb.org/MSRB-For/Issuers/Issuer-Toolkit.aspx](http://www.msrb.org/MSRB-For/Issuers/Issuer-Toolkit.aspx). It provides information about bond issuance ~~and~~ required disclosures, ~~and working with municipal advisors.~~~~

~~Resources about issuing bonds at: [www.msrb.org/MSRB-For/Issuers.aspx](http://www.msrb.org/MSRB-For/Issuers.aspx).~~

established by a rating service of nationally recognized expertise in rating bonds of states and their political subdivisions.

7. Short term discount obligations of the Federal National Mortgage Association or in shares or other forms of securities legally issuable by savings banks or savings and loan associations incorporated under the laws of this State or any other state or under the laws of the United States. Investments may be made only in those savings banks or savings and loan associations, the shares, or investment certificates that are insured by the Federal Deposit Insurance Corporation. Any such securities may be purchased at the offering or market price thereof at the time of such purchase. All such securities so purchased shall mature or be redeemable on a date or dates prior to the time when, in the judgment of the Chief Investment Officer, the public funds so invested will be required for expenditure by the District or its governing authority.
8. Dividend-bearing share accounts, share certificate accounts, or class of share accounts of a credit union chartered under the laws of this State or the laws of the United States; provided, however, the principle office of any such credit union must be located within the State of Illinois. Investments may be made only in those credit unions the accounts of which are insured by applicable law.
9. A Public Treasurers' Investment Pool created under Section 17 of the State Treasurer Act. The District may also invest any public funds in a fund managed, operated, and administered by a bank, subsidiary of a bank, or subsidiary of a bank holding company or use the services of such an entity to hold and invest or advise regarding the investment of any public funds.
10. The Illinois School District Liquid Asset Fund Plus. <sup>7</sup>
11. Repurchase agreements of government securities having the meaning set out in the Government Securities Act of 1986, as now or hereafter amended or succeeded, subject to the provisions of said Act and the regulations issued there under. The government securities, unless registered or inscribed in the name of the District, shall be purchased through banks or trust companies authorized to do business in the State of Illinois.

Except for repurchase agreements of government securities that are subject to the Government Securities Act of 1986, as now or hereafter amended or succeeded, the District may not purchase or invest in instruments that constitute repurchase agreements, and no financial institution may enter into such an agreement with or on behalf of the District unless the instrument and the transaction meet all of the following requirements:

- a. The securities, unless registered or inscribed in the name of the District, are purchased through banks or trust companies authorized to do business in the State of Illinois.
- b. The Chief Investment Officer, after ascertaining which firm will give the most favorable rate of interest, directs the custodial bank to "purchase" specified securities from a designated institution. The "custodial bank" is the bank or trust company, or agency of government, that acts for the District in connection with repurchase agreements involving

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<sup>7</sup> The Illinois School District Liquid Asset Fund Plus is an Illinois trust organized to permit Illinois school districts, community colleges, and educational service regions to pool their investment funds to obtain the highest possible investment yield consistent with maintaining liquidity and preserving capital, and to engage in cooperative cash management activities resulting in more efficient financial resource utilization. The program was developed in cooperation with the Illinois Association of School Boards, the Illinois Association of School Business Officials, and the Illinois Association of School Administrators. To receive marketing information and the name of the marketing representative, contact: PMA Financial Network, Inc., Illinois School District Liquid Asset Fund Plus, [www.isdlafplus.com](http://www.isdlafplus.com), 27545 Diehl Road 2135 City Gate Lane, 7th Floor, Warrenville/Naperville, Illinois 6056355; or call 1-866-747-4477.

- the investment of funds by the District. The State Treasurer may act as custodial bank for public agencies executing repurchase agreements.
- c. A custodial bank must be a member bank of the Federal Reserve System or maintain accounts with member banks. All transfers of book-entry securities must be accomplished on a Reserve Bank's computer records through a member bank of the Federal Reserve System. These securities must be credited to the District on the records of the custodial bank and the transaction must be confirmed in writing to the District by the custodial bank.
  - d. Trading partners shall be limited to banks or trust companies authorized to do business in the State of Illinois or to registered primary reporting dealers.
  - e. The security interest must be perfected.
  - f. The District enters into a written master repurchase agreement that outlines the basic responsibilities and liabilities of both buyer and seller.
  - g. Agreements shall be for periods of 330 days or less.
  - h. The Chief Investment Officer informs the custodial bank in writing of the maturity details of the repurchase agreement.
  - i. The custodial bank must take delivery of and maintain the securities in its custody for the account of the District and confirm the transaction in writing to the District. The custodial undertaking shall provide that the custodian takes possession of the securities exclusively for the District; that the securities are free of any claims against the trading partner; and that any claims by the custodian are subordinate to the District's claims to rights to those securities.
  - j. The obligations purchased by the District may only be sold or presented for redemption or payment by the fiscal agent bank or trust company holding the obligations upon the written instruction of the Chief Investment Officer.
  - k. The custodial bank shall be liable to the District for any monetary loss suffered by the District due to the failure of the custodial bank to take and maintain possession of such securities.
12. Any investment as authorized by the Public Funds Investment Act, and Acts amendatory thereto. Paragraph 11 supersedes paragraphs 1-10 and controls in the event of conflict.

Except as provided herein, investments may be made only in banks, savings banks, savings and loan associations, or credit unions that are insured by the Federal Deposit Insurance Corporation or other approved share insurer. <sup>8</sup>

#### Selection of Depositories, Investment Managers, Dealers, and Brokers <sup>9</sup>

The Chief Investment Officer shall establish a list of authorized depositories, investment managers, dealers and brokers based upon the creditworthiness, reputation, minimum capital requirements, qualifications under State law, as well as a long history of dealing with public fund entities. The Board will review and approve the list at least annually.

In order to be an authorized depository, each institution must submit copies of the last [two](#) sworn statements of resources and liabilities or reports of examination that the institution is required to furnish to the appropriate State or federal agency.<sup>10</sup> Each institution designated as a depository shall, while acting as such depository, furnish the District with a copy of all statements of resources and

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<sup>8</sup> 30 ILCS 235/2, [amended by P.A. 100-752](#).

<sup>9</sup> The policy must address these topics. [30 ILCS 235/2.5\(a\)\(11\)](#).

<sup>10</sup> 30 ILCS 235/6.

liabilities or all reports of examination that it is required to furnish to the appropriate State or federal agency. <sup>11</sup>

The above eligibility requirements of a bank to receive or hold public deposits do not apply to investments in an interest-bearing savings account, interest-bearing certificate of deposit, or interest-bearing time deposit if: (1) the District initiates the investment at or through a bank located in Illinois, and (2) the invested public funds are at all times fully insured by an agency or instrumentality of the federal government. <sup>12</sup>

The District may consider a financial institution's record and current level of financial commitment to its local community when deciding whether to deposit funds in that financial institution. The District may consider factors including: <sup>13</sup>

1. For financial institutions subject to the federal Community Reinvestment Act of 1977, the current and historical ratings that the financial institution has received, to the extent that those ratings are publicly available, under the federal Community Reinvestment Act of 1977;
2. Any changes in ownership, management, policies, or practices of the financial institution that may affect the level of the financial institution's commitment to its community;
3. The financial impact that the withdrawal or denial of District deposits might have on the financial institution;
4. The financial impact to the District as a result of withdrawing public funds or refusing to deposit additional public funds in the financial institution; and
5. Any additional burden on the District's resources that might result from ceasing to maintain deposits of public funds at the financial institution under consideration.

#### Collateral Requirements <sup>14</sup>

All amounts deposited or invested with financial institutions in excess of any insurance limit shall be collateralized in accordance with the Public Funds Investment Act, 30 ILCS 235/. The Superintendent or designee shall keep the Board informed of collateral agreements.

#### Safekeeping and Custody Arrangements <sup>15</sup>

The preferred method for safekeeping is to have securities registered in the District's name and held by a third-party custodian. Safekeeping practices should qualify for the Governmental Accounting Standards Board Statement No. 3, Deposits with Financial Institutions, Investments (including Repurchase Agreements), and Reverse Repurchase Agreements, Category I, the highest recognized safekeeping procedures.

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<sup>11</sup> Id.

<sup>12</sup> 30 ILCS 235/6.5.

<sup>13</sup> This paragraph is optional, but is authorized by 30 ILCS 235/8.

<sup>14</sup> Collateral requirements are permissive; if used, guidelines regarding their use must be included in the policy. (30 ILCS 235/2.5(a)(5)). The requirements for collateral agreements are in 30 ILCS 235/6(d). The sample policy contains one guideline, that is, that the board be kept informed of collateral agreements. An optional guideline follows: “

In addition, the financial institution must provide the Board with a copy of its board of directors' meeting minutes evidencing that the board of directors approved the collateral agreement.”<sup>22</sup>

<sup>15</sup> The policy must address safekeeping and custody arrangements. (30 ILCS 235/2.5(a)(5)). Registration requirements are in 30 ILCS 235/3.

### Controls and Report 16

The Chief Investment Officer shall establish a system of internal controls and written operational procedures to prevent losses arising from fraud, employee error, misrepresentation by third parties, or imprudent employee action.

The Chief Investment Officer shall provide a quarterly investment report to the Board. The report will: (1) assess whether the investment portfolio is meeting the District's investment objectives, (2) identify each security by class or type, book value, income earned, and market value, (3) identify those institutions providing investment services to the District, and (4) include any other relevant information. The investment portfolio's performance shall be measured by appropriate and creditable industry standards for the investment type. <sup>17</sup>

The Board will determine, after receiving the Superintendent's recommendation, which fund is in most need of interest income and the Superintendent shall execute a transfer. This provision does not apply when the use of interest earned on a particular fund is restricted. <sup>18</sup>

### Ethics and Conflicts of Interest 19

The Board and District officials will avoid any investment transaction or practice that in appearance or fact might impair public confidence. Board members are bound by the Board policy 2:100, *Board Member Conflict of Interest*. No District employee having influence on the District's investment decisions shall:

1. Have any interest, directly or indirectly, in any investments in which the District is authorized to invest,
2. Have any interest, directly or indirectly, in the sellers, sponsors, or managers of those investments, or
3. Receive, in any manner, compensation of any kind from any investments in that the agency is authorized to invest.

LEGAL REF.: 30 ILCS 235/  
105 ILCS 5/8-7, 5/10-22.44, 5/17-1, and 5/17-11.

CROSS REF.: 2:100 (Board Member Conflict of Interest), 4:10 (Fiscal and Business Management), 4:80 (Accounting and Audits)

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<sup>16</sup> The policy must provide for internal controls, periodic review, and at least quarterly written investment reports. (30 ILCS 235/2.5(a)(6), (9), and (10)). The operational procedures to prevent losses are best addressed by each district in consultation with its auditor and legal counsel. See [policy 4:80, Accounting and Audits](#); ~~and 4:80-AP1, Checklist for Internal Controls~~; and [4:80-AP2, Fraud, Waste, and Abuse Awareness Program](#).

<sup>17</sup> The policy must include performance measures. (30 ILCS 235/2.5(8)).

<sup>18</sup> 105 ILCS 5/10-22.44. "Chief Business Official" may replace "Superintendent." Interest income earned on any funds for IMRF, Tort Immunity Act, Fire Prevention, Safety and Environmental Energy, and Capital Improvement Act are restricted to the respective fund. Id.

<sup>19</sup> The policy must address these topics. (30 ILCS 235/2.5(a)(12)). The conflict of interest prohibition is in 30 ILCS 235/2.

## Operational Services

### Administrative Procedure - Preparing and Updating Disclosures

*This sample administrative procedure has been adapted and printed with the express permission of Chapman and Cutler LLP. Chapman and Cutler LLP is pleased to provide this sample procedure as an example of factors issuers should consider under current law in preparing policies and procedures for post-issuance compliance with federal securities laws and regulations. It is intended to provide general guidance with the understanding that the provision of the sample procedure does not constitute the rendering of legal advice by Chapman and Cutler LLP or the establishment of an attorney-client relationship with any user of the sample procedure. Reference to this sample procedure should not be considered a substitute for consultation with your legal advisors. Readers should understand that the application of relevant statutory and regulatory provisions can vary based on specific facts and that changes in law or facts may impact the applicability of the sample procedure. Chapman and Cutler LLP assumes no obligation to update the sample procedure to reflect changes in law or practice.*

Pursuant to the District's responsibilities under the securities laws, including its continuing disclosure undertakings (*Undertakings*) under Rule 15c2-12 of the Securities Exchange Act of 1934, as amended, and the Securities and Exchange Commission's statements in enforcement actions, it is necessary and in the District's best interest that the District comply in all material respects with federal securities laws regarding its (i) preliminary and final official statements or offering circulars and any supplements or amendments thereto (collectively, the *Official Statements*), disseminated by the District in connection with any bonds, notes, certificates or other obligations, (ii) Annual Financial Information, as required by and defined in the Undertakings (the *Annual Financial Information*) to be filed with the Municipal Securities Rulemaking Board's (MSRB) Electronic Municipal Market Access (EMMA) system, and (iii) notices of Material Events or Reportable Events, each as defined in the Undertakings, and any other required or voluntary disclosures to EMMA (each, an *EMMA Notice*). These procedures are designed to enable the District to create accurate disclosures with respect to its (i) Official Statements, (ii) Annual Financial Information, and (iii) EMMA Notices, which are collectively referred to herein as *Disclosures*.

In response to these interests, the District hereby adopts the following procedures:

- A. *Disclosure Officer*. Consistent with Board Policy 4:40, *Incurring Debt*, the Superintendent<sup>1</sup> (*Disclosure Officer*) is hereby designated as the officer responsible for the procedures related to Disclosures as hereinafter set forth (collectively, *Disclosure Procedures*).
- B. *Disclosure Procedures: Official Statements*. Whenever an Official Statement will be disseminated in connection with the issuance of obligations by the District, the Disclosure Officer will oversee the process of preparing the Official Statement pursuant to the following procedures:
  1. The District shall select (a) the working group for the transaction, which group may include outside professionals such as disclosure counsel, a municipal advisor, and an underwriter (the *Working Group*), and (b) the member of the Working Group responsible for preparing the first draft of the Official Statement.
  2. The Disclosure Officer shall review and make comments on the first draft of the Official Statement. Such review shall be done to determine that the Official Statement does not include any untrue statement of a material fact or omit a material fact necessary to make the statements made in the Official Statement not misleading. Particular attention shall be paid to the accuracy

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<sup>1</sup> Districts that employ business managers may want to substitute "Business Manager", "Chief School Business Official", or ~~locally~~ another locally equivalent title ~~for "Superintendent."~~

of all descriptions, significant information, and financial data regarding the District. Examples include confirming that information relating to the District, including but not limited to demographic changes, the addition or loss of major employers, the addition or loss of major taxpayers or any other material information within the knowledge of the Disclosure Officer, is included and properly disclosed. The Disclosure Officer shall also be responsible for ensuring that the financial data presented with regard to the District is accurate and corresponds with the financial information in the District's possession, including but not limited to information regarding bonded indebtedness, notes, certificates, outstanding leases, tax rates or any other financial information of the District presented in the Official Statement.

3. After completion of the review set forth in 2, above, the Disclosure Officer shall (a) discuss the first draft of the Official Statement with the members of the Working Group and such staff and officials of the District as the Disclosure Officer deems necessary and appropriate, and (b) provide comments, as appropriate, to the members of the Working Group. The Disclosure Officer shall also consider comments from members of the Working Group and whether any additional changes to the Official Statement are necessary or desirable to make the document compliant with the requirements set forth in 2, above.
4. The Disclosure Officer shall continue to review subsequent drafts of the Official Statement in the manner set forth in 2 and 3, above.
5. If, in the Disclosure Officer's reasonable judgment, the Official Statement does not include any untrue statement of a material fact or omit a material fact necessary to make the statements made in the Official Statement not misleading, the Official Statement may, in the reasonable discretion of the Disclosure Officer, be released for dissemination to the public; *provided, however,* that the use of the Official Statement must be ratified, approved, and authorized by the Board.

C. *Disclosure Procedures: Annual Financial Information.* The Disclosure Officer will oversee the process of preparing the Annual Financial Information pursuant to these procedures:

1. By December 20<sup>th</sup><sup>2</sup> of each year (the same being at least 30 days prior to the last date on which the Annual Financial Information is required to be disseminated pursuant to the related Undertaking) the Disclosure Officer shall begin to prepare (or hire an agent to prepare) the Annual Financial Information. The Disclosure Officer shall also review the audited or unaudited financial statements, as applicable, to be filed as part of the Annual Financial Information (*Financial Statements*). In addition to the required updating of the Annual Financial Information, the Disclosure Officer should consider whether additional information needs to be added to the Annual Financial Information to make the Annual Financial Information, including the Financial Statements, taken as a whole, correct and complete in all material respects. For example, if disclosure of events that occurred subsequent to the date of the Financial Statements would be necessary to clarify, enhance or correct information presented in the Financial Statements, in order to make the Annual Financial Information, taken as a whole, correct and complete in all material respects, disclosure of such subsequent events should be made.

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The footnotes should be removed before the material is used.

<sup>2</sup> The deadline for the dissemination of Annual Financial Information and/or Audited Financial Statements should be set forth in each applicable Undertaking. These procedures assume the deadline set forth in each such Undertaking is not later than 210 days after the end of a district's fiscal year (ending June 30). If one of more of a district's Undertakings provide for a different deadline, it may be appropriate or necessary to change the date in Paragraph C.1 above.

2. If, in the Disclosure Officer's reasonable judgment, the Annual Financial Information, including the Financial Statements, is correct and complete in all material respects, the Disclosure Officer shall file the Annual Financial Information with EMMA (or confirm that such filing is completed by any agent hired by the District for such purpose) within the timeframe allowed for such filing.

D. Disclosure Procedures: Reportable Events. The Disclosure Officer will prepare (or hire an agent to prepare) Reportable Event Disclosure and file the same with EMMA (or confirm that such filing is completed by an agent hired by the District for such purpose) in a timely manner (not in excess of 10 business days after the occurrence of the Reportable Event). Incurrence of a Financial Obligation, if material, or agreement to covenants, events of default, remedies, priority rights, or other similar terms of a Financial Obligation, any of which affect security holders, if material, is a Reportable Event. Upon the incurrence of any Financial Obligation, as such term is defined in the Undertaking, the Disclosure Officer shall review such Financial Obligation and assess whether such Financial Obligation is material. If, in connection with such Financial Obligation, the District has agreed to any covenant, event of default, remedy, priority right or other similar term which affects security holders, the Disclosure Officer shall further review such term and assess whether the same is material. The Disclosure Officer shall prepare a summary of such review. If, in the Disclosure Officer's reasonable judgment, following consultation with financial or legal professionals as necessary, such Financial Obligation and/or term of such Financial Obligation is deemed material, the Disclosure Officer shall file a summary of such Financial Obligation (or the entire financing document, provided that confidential or sensitive information may be redacted to the extent such redaction does not prevent all material terms from being disclosed) with EMMA not in excess of ten business days after the incurrence of such Financial Obligation. (This paragraph (d) shall only apply if the District has entered into an Undertaking on or after February 27, 2019.)

D.E. Disclosure Procedures: EMMA Notices. Whenever the District determines to file an EMMA Notice, or whenever the District decides to make a voluntary filing to EMMA, the Disclosure Officer will oversee the process of preparing the EMMA Notice pursuant to these procedures:

1. The Disclosure Officer shall prepare (or hire an agent to prepare) the EMMA Notice. The EMMA Notice shall be prepared in the form required by the MSRB.
2. In the case of a disclosure required by an Undertaking, the Disclosure Officer shall determine whether any changes to the EMMA Notice are necessary to make the document compliant with the Undertaking.
3. If, in the Disclosure Officer's reasonable judgment, the EMMA Notice is correct and complete and, in the case of a disclosure required by an Undertaking, complies with the Undertaking, the Disclosure Officer shall file the EMMA Notice with EMMA (or confirm that such filing is completed by any agent hired by the District for such purpose) within the timeframe allowed for such filing.

E.F. Additional Responsibilities of the Disclosure Officer. The Disclosure Officer, in addition to the specific responsibilities outlined above, shall have general oversight of the entire disclosure process, which shall include:

1. Maintaining appropriate records of compliance with these Disclosure Procedures (including proofs of EMMA filings) and decisions made with respect to issues that have been raised;
2. Evaluating the effectiveness of the procedures contained in these Disclosure Procedures; and
3. Informing the Board when substantive revisions or modifications are made to these Disclosure Procedures.

F.G. *General Principles.*

1. All participants in the disclosure process should be encouraged to raise potential disclosure items at all times in the process.
2. The process of revising and updating the Disclosures should not be viewed as a mechanical insertion of current numbers. While it is not anticipated that there will be major changes in the form and content of the Disclosures at the time of each update, the Disclosure Officer should consider whether such changes are necessary or desirable to make sure the Disclosure does not make any untrue statement of a material fact or omit a material fact necessary or desirable, in order to make the statements made, in light of the circumstances in which they were made, not misleading at the time of each update.
3. Whenever the District releases information, whether in written or spoken form, that may reasonably be expected to reach investors, it is said to be “speaking to the market.” When speaking to the market, District officials must be sure that the released information does not make any untrue statement of a material fact or omit a material fact necessary or desirable, in order to make the statements made, in light of the circumstances in which they were made, not misleading.
4. While care should be taken not to shortcut or eliminate any steps outlined in these Disclosure Procedures on an ad hoc basis, the review and maintenance of the Disclosures is a fluid process and recommendations for improvement of these Disclosure Procedures should be solicited and regularly considered.
5. The Disclosure Officer is authorized to request and pay for attendance at relevant conferences or presentations or annual training sessions conducted by outside counsel, consultants or experts in order to ensure a sufficient level of knowledge for the effective administration of these Disclosure Procedures.

LEGAL REF.: [15 U.S.C. §77a et seq.](#), Securities Act of 1933, ~~15 U.S.C. §77a et seq.~~  
[15 U.S.C. §78a et seq.](#), Securities Exchange Act of 1934, ~~15 U.S.C. §78a et seq.~~  
17 C.F.R. §240.15c2-12.

## Operational Services

### Exhibit - Notice to Contractors

*On District letterhead.*

#### Date

Notice to contractor:

You are receiving this notice because you may or will be performing *public works* for the School District as that term is defined in ~~Section 2 of~~ the Illinois Prevailing Wage Act. (IPWA). 820 ILCS 130/2.

This notice applies to the public works described as: \_\_\_\_\_.

The ~~Prevailing Wage Act~~IPWA requires contractors and subcontractors to pay laborers, workers, and mechanics performing services on public works projects no less than the *prevailing rate of wages* (hourly cash wages plus fringe benefits) in the county where the work is performed. Any prevailing rate of wages as they are revised by the Ill. Dept. of Labor (IDOL) shall apply to this contract. You are notified that any rate changes to the prevailing wage rate are available on ~~the Dept.'s~~IDOL's official website. For information regarding current prevailing wage rates, please see the ~~Illinois Dept. of Labor's~~IDOL's website at: ~~www.state.il.us/agency/idol/rates/rates.HTM~~ and ~~www.illinois.gov/idol/Laws-Rules/CONMED/Pages/Rates.aspx~~https://www2.illinois.gov/idol/Laws-Rules/CONMED/Pages/prevailing-wage-rates.aspx.

All contractors and subcontractors rendering services for the public works must comply with all requirements of the ~~Prevailing Wage Act~~IPWA, including but not limited to, all wage, notice, and ~~record-keeping~~recordkeeping duties.

The above paragraph was or will be included in the project specifications and the contract. 820 ILCS 130/4(~~a-1c~~). If the work is awarded without a public bid, contract, or project specification, the notice was or will be included in the purchase order related to the work or in a separate document, such as this notification. 820 ILCS 130/4(~~a-2f~~).

## Operational Services

### Insurance Management <sup>1</sup>

The Superintendent shall recommend and maintain all insurance programs that provide the broadest and most complete coverage available at the most economical cost, consistent with sound insurance principles.

The insurance program shall include each of the following: <sup>2</sup>

1. Liability coverage to insure against any loss or liability of the School District and the listed individuals against civil rights damage claims and suits, constitutional rights damage claims and suits, and death and bodily injury and property damage claims and suits, including defense costs, when damages are sought for negligent or wrongful acts allegedly committed in the scope of employment or under the Board's direction or related to any mentoring services provided to the District's certified staff members; School Board members; employees; volunteer personnel authorized by 105 ILCS 5/10-22.34, 5/10-22.34a, and 5/10-22.34b; mentors of certified staff members authorized in 105 ILCS 5/21A-5 et seq. (new teacher), 105 ILCS 5/2-3.53a (new principal), and 2-3.53b (new superintendents); and student teachers. <sup>3</sup>
2. Catastrophic accident insurance at the mandated benefit level for student athletes in grades 9 through 12 who sustain an accidental injury while participating in school-sponsored or school-supervised interscholastic athletic events sanctioned by the Illinois Ill. High School Association that results in medical expenses in excess of \$50,000. <sup>4</sup>

**The footnotes are not intended to be part of the adopted policy; they should be removed before the policy is adopted.**

<sup>1</sup> State law controls this policy's content. The Health Insurance Portability and Accountability Act (HIPAA) guarantees the continuity of health insurance benefits for individuals changing employment. It also contains provisions promoting the: (1) standardization and efficiency for the electronic submission, processing, and payment of health care claims, and (2) security and privacy requirements for health information. ~~See 45 C.F.R. §§160 and 164.~~ **School officials are urged to consult with their insurance providers and legal counsel to devise a compliance plan.**

<sup>2</sup> Other types of district-purchased insurance should also be listed here, such as, insurance programs for employees and their dependents (authorized by 105 ILCS 5/10-22.3a). Note that: (1) any employee or retired employee insurance program is a mandatory subject of bargaining, and (2) State law provides persons entering into a civil union with the obligations, responsibilities, protections, and benefits afforded or recognized by Ill. law to spouses (750 ILCS 75/).

<sup>3</sup> A board's duty to indemnify and protect specific individuals is found in 105 ILCS 5/10-20.20. A board's duty to insure against loss or liability is found in 105 ILCS 5/10-22.3. The lists of individuals to be protected are identical in both statutes except that *mentors* was added in 2009 to only the indemnification statute. As the best method for providing indemnification is through insurance, this policy includes mentors in its list of individuals covered by the district's liability insurance.

<sup>4</sup> 105 ILCS 5/22-15, ~~amended by P.A. 98-166,~~ requires each school district having grades 9 through 12 to maintain catastrophic insurance coverage for student athletes participating in interscholastic athletic events sanctioned by IHSA-the Ill. High School Association (IHSA). The minimum level of coverage must provide aggregate benefit levels of \$3 million or 5 years, whichever comes first, for injuries with total medical expenses exceeding \$50,000. The law authorizes IHSA to promulgate a plan of coverage under a group policy that provides the necessary coverage. If a district opts out of IHSA's group policy, it must offer alternative coverage and submit to IHSA a certificate from the provider stating that the insurance complies with the plan of coverage approved by IHSA.

3. Comprehensive property insurance covering a broad range of causes of loss involving building and personal property. The coverage amount shall normally be for the replacement cost or the insurable value.
4. Workers' Compensation to protect individual employees against financial loss in case of a work-related injury, certain types of disease, or death incurred in an employee-related situation.

#### Student Insurance 5

The Board shall annually designate a company to offer student accident insurance coverage. The Board does not endorse the plan nor recommend that parents/guardians secure the coverage, and any contract is between the parent(s)/guardian(s) and the company.

LEGAL REF.: Consolidated Omnibus Budget Reconciliation Act, [Pub. L. 99-272, § 1001-1001](#),  
100 Stat. 222, 4980B(f) of the I.R.S. Code, 42 U.S.C. §300bb-1 *et seq.*  
105 ILCS 5/10-20.20, 5/10-22.3, 5/10-22.3a, 5/10-22.3b, 5/10-22.3f, 5/10-22.34,  
5/10-22.34a, 5/10-22.34b, and 5/22-15.  
215 ILCS 5/, [Ill. Insurance Code](#).  
750 ILCS 75/, [Ill. Religious Freedom Protection and Civil Union Act](#).  
820 ILCS 305/, [Workers' Compensation Act](#).

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Delete item #2 if the district: (1) does not maintain grades 9-12, or (2) qualifies for an exemption from the mandatory coverage (contact IHSA or the board attorney for information about claiming an exemption). A district maintaining grades K-8 may, but is not required to, provide accident and/or health insurance on a group or individual basis for students injured while participating in any school-sponsored athletic activity. If so, the following may be *added to* item #2 (for unit districts) or may *replace* item #2 (for elementary districts): "Accident and/or health insurance on a group or individual basis for students in grades kindergarten through 8 participating in any school-sponsored athletic activity." If item #2 is deleted and the option is not used, the board should omit the citation to catastrophic accident insurance ([105 ILCS 5/22-15](#)) in the legal references.

5 Optional. Until May 2014, this paragraph was included in sample policy 4:170, *Safety*.

## Operational Services

### Transportation 1

The District shall provide free transportation for any student in the District who resides: (1) at a distance of one and one-half miles or more from his or her assigned school, unless the School Board has certified to the Illinois State Board of Education that adequate public transportation is available,<sup>2</sup> or (2) if adequate public transportation is not available, within one and one-half miles from his or her assigned school where walking to or from school or to or from a pick-up point or bus stop would constitute a *serious safety hazard* due to either (a) vehicular traffic or rail crossings, and adequate public transportation is not available, or (b) a course or pattern of criminal activity, as defined in the Ill. Streetgang Terrorism Omnibus Prevention Act, 740 ILCS 147/.<sup>3</sup> A student's parent(s)/guardian(s) may

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<sup>1</sup> State law controls this policy's content. 105 ILCS 5/29-1 et seq. and 23 Ill.Admin.Code Part 120. **Important: The board of a district that does *not* provide transportation must amend this policy.** F/n 2 discusses when districts must provide free transportation. Please contact an IASB Policy Consultant for *gratis* help customizing this policy. You may also need to consult the board attorney.

A district that chooses to consider locations other than individual students' residences as pick-up and drop-off locations must adopt a policy establishing this practice to receive State reimbursement. 23 Ill.Admin.Code §120.30(a)(1)(B).

Each district must have a pre-trip and post-trip inspection policy. 625 ILCS 5/12-816(a). An ISBE rule requires boards to "institute policies and practices that promote the safety and well-being of school bus passengers." 23 Ill.Admin.Code §1.510(g). To comply with these requirements, this policy lists relevant administrative procedures at the end.

The policy does not address an *automatic traffic enforcement* system which may be enacted by a municipality or county. An *automatic traffic law enforcement system* is a device that senses and records a motor vehicle that illegally fails to stop for a school bus. 625 ILCS 5/11-208.9. Each school board within that municipality or county's jurisdiction may approve the system's implementation. The board is then required to enter into an intergovernmental agreement with the municipality or county and contract with vendors for the system's installation, maintenance, and operation. Each applicable school bus must be posted with a sign indicating that it is being monitored by an automated traffic law enforcement system. The proceeds from a school district's automated traffic law enforcement system's fines shall be divided equally between the school district and the municipality or county administering the automated traffic law enforcement system.

<sup>2</sup> Only the following districts must provide free transportation as described in the sample policy: community consolidated districts, community unit districts, consolidated districts, consolidated high school districts, and combined school districts if the combined district includes any district that was previously required to provide transportation. 105 ILCS 5/29-3, amended by P.A. 100-1142, and 23 Ill.Admin.Code §1.510(a). Districts that are not required to provide free transportation may do so. Id. To qualify for State reimbursement, districts electing to provide transportation when they are not required to do so must afford the same service to all students in that same situation. 23 Ill.Admin.Code §1.510(b). Districts may provide transportation within one and one-half miles and may charge for such transportation. 105 ILCS 5/29-2.

Optional provision: (105 ILCS 5/29-3.1)

The District may provide transportation to and from school-sponsored activities and may charge for such transportation.

<sup>3</sup> 105 ILCS 5/29-3, amended by P.A. 100-1142 and 23 Ill.Admin.Code §1.510. The determination as to what constitutes a *serious safety hazard regarding vehicular traffic or rail crossings* is made by the board, in accordance with guidelines issued by the Ill. Dept. of Transportation, in consultation with the State Superintendent of Education. The Ill. Streetgang Terrorism Omnibus Prevention Act defines *course or pattern of criminal activity* as two or more gang-related criminal offenses committed in whole or in part within Illinois when: (1) one or more of the offenses was committed after 1-1-93, (2) both offenses were committed within five years of each other; and (3) at least one offense involved a felony or forcible felony under the Ill. Criminal Code of 1961 or 2012. 740 ILCS 147/10. It also includes criminal defacement of property that includes a streetgang sign or symbol. Id. The determination as to what constitutes a *serious safety hazard due to a course or pattern of criminal activity* under 105 ILCS 5/29-3 is made by the board, in accordance with guidelines determined by local law enforcement, in consultation with the State Superintendent of Education.

file a petition with the Board requesting transportation due to the existence of a serious safety hazard.<sup>4</sup> Free transportation service and vehicle adaptation is provided for a special education student if included in the student's individualized educational program.<sup>5</sup> Non-public school students shall be transported in accordance with State law.<sup>6</sup> Homeless students shall be transported in accordance with Section 45/1-15 of the Education for Homeless Children Act.<sup>7</sup> Foster care students shall be transported in accordance with Section 6312(c)(5)(B) of the Elementary and Secondary Education Act.<sup>8</sup>

If a student is at a location within the District, other than his or her residence, for child care purposes at the time for transportation to and/or from school, that location may be considered for purposes of determining the one and one-half miles from the school attended. Unless the Superintendent or designee establishes new routes, pick-up and drop-off locations for students in day care must be along the District's regular routes. The District will not discriminate among types of locations where day care is provided, which may include the premises of licensed providers, relatives' homes, or neighbors' homes.<sup>9</sup>

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<sup>4</sup> Required by 105 ILCS 5/29-3, amended by P.A. 100-1142. Another statute provides a process for *qualifying students* to seek reimbursement from ISBE for *qualified transportation expenses*. 105 ILCS 5/29-5.2; 23 Ill.Admin.Code §120.240. 23 Ill.Admin.Code §120.230 requires, among other things, that each attendance center designate a representative to assist parents/guardians with this process. This process does not need to be in board policy and is not covered herein.

<sup>5</sup> 34 C.F.R. §300.34 and 23 Ill.Admin.Code §226.750.

<sup>6</sup> 105 ILCS 5/29-3.2 and 5/29-4.

<sup>7</sup> 105 ILCS 45/. State law implements the McKinney-Vento Homeless Assistance Act, 42 U.S.C. §11431 *et seq.*

P.A. 100-332 amended the School Code and the Education for Homeless Children Act to permit school districts to use their State transportation funds to provide financial assistance to children that are defined as homeless or *at risk of becoming homeless*, provided certain criteria are satisfied. 105 ILCS 5/29-5; 105 ILCS 45/1-17. Financial assistance may include: (1) mortgage or rental assistance that will allow a child to remain permanently in his/her living situation or obtain a new living situation; and/or (2) assistance with unpaid bills, loans, or other financial debts that result in housing being inadequate. 105 ILCS 45/1-17(a). For further detail, see 6:140-AP, *Education of Homeless Children*.

<sup>8</sup> Required if the district receives Title I funds. 20 U.S.C. §6312(c)(5)(B). The Elementary and Secondary Education Act (ESEA) requires the district to collaborate with the State or local child welfare agency to develop and implement clear written procedures governing how transportation to maintain children in foster care in the school of origin (when in their best interest) will be provided, arranged, and funded for the duration of their time in foster care. ISBE guidance on transportation procedures for students in foster care is available at: [www.isbe.net/Pages/Foster-Care.aspx](http://www.isbe.net/Pages/Foster-Care.aspx); [www.isbe.net/Pages/Funding-and-Disbursements-Transportation-Programs.aspx](http://www.isbe.net/Pages/Funding-and-Disbursements-Transportation-Programs.aspx). The U.S. Depts. of Education and Health and Human Services, in *Non-Regulatory Guidance: Ensuring Educational Stability for Children in Foster Care* (6-23-16) at: [www2.ed.gov/policy/elsec/leg/essa/edhhsfostercarenonregulatorguide.pdf](http://www2.ed.gov/policy/elsec/leg/essa/edhhsfostercarenonregulatorguide.pdf), opine that ESEA requirements apply to students who meet the definition of *foster care* set forth at 45 C.F.R. §1355.20(a):

*Foster care* means 24-hour substitute care for children placed away from their parents or guardians and for whom the title IV-E agency has placement and care responsibility. This includes, but is not limited to, placements in foster family homes, foster homes of relatives, group homes, emergency shelters, residential facilities, child care institutions, and pre-adoptive homes. A child is in foster care in accordance with this definition regardless of whether the foster care facility is licensed and payments are made by the State, Tribal or local agency for the care of the child, whether adoption subsidy payments are being made prior to the finalization of an adoption, or whether there is Federal matching of any payments that are made.

ESEA foster care transportation requirements also apply to students *awaiting* foster care placement.

105 ILCS 5/10-20.58,59 added by P.A. 99-781, permits school boards to appoint at least one employee to act as a liaison to facilitate the enrollment and transfer of records of students in the legal custody of the Ill. Department of Children and Family Services (DCFS) when enrolling in or changing schools. Liaison responsibilities may include, among other things, working with DCFS to help students maintain their school placement, if appropriate.

<sup>9</sup> This paragraph should be deleted if a district will not seek State reimbursement for transportation to and from locations other than individual students' residences. As a condition for receiving State reimbursement, an ISBE rule requires boards to have a policy with the provisions in this paragraph. 23 Ill.Admin.Code §120.30(a)(1)(B). This rule also contains the non-discrimination language.

Bus schedules and routes shall be determined by the Superintendent or designee and shall be altered only with the Superintendent or designee's approval and direction. In setting the routes, the pick-up and discharge points should be as safe for students as possible. 10

No school employee may transport students in school or private vehicles unless authorized by the administration. 11

Every vehicle regularly used for the transportation of students must pass safety inspections in accordance with State law and Illinois Department of Transportation regulations.12 The strobe light on a school bus may be illuminated only when the bus is actually being used as a school bus and (1) is stopping or stopped for loading or discharging students on a highway outside an urban area, or (2) is bearing one or more students.13 The Superintendent shall implement procedures in accordance with State law for accepting comment calls about school bus driving. 14

All contracts for charter bus services must contain the clause prescribed by State law regarding criminal background checks for bus drivers. 15

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10 The paragraph is optional. As an alternative, a board may state that pick-up and discharge points "should be as safe and convenient as possible."

11 Optional. This presents an opportunity for each board to discuss this issue with the superintendent and direct the superintendent to include it in the curriculum for the required in-service on educator ethics, teacher-student conduct, and school employee-student conduct for all personnel. 105 ILCS 5/10-22.39. See 5:100, *Staff Development Program* (f/n 3), and 5:120, *Employee Ethics; Conduct; and Conflict of Interest* (f/n 2), for more detailed discussions. Include policies 5:100, *Staff Development Program* and 5:120, *Employee Ethics; Conduct; and Conflict of Interest*, in the Cross References when this sentence is used.

12 625 ILCS 5/13-109. The vehicle and other requirements for transporting students to and from interscholastic or school-sponsored activities, including curriculum-related activities, are found in 105 ILCS 5/29-6.3 and 625 ILCS 5/11-1414.1. These statutes also contain requirements for the use of multi-function school activity buses (defined at 625 ILCS 5/1-148.3a-5). The legislature frequently amends these statutes, along with many transportation laws; they should be double-checked before relying on them.

13 625 ILCS 5/12-815. The statute, like the policy, identifies the conditions in which illuminating the strobe light is permissible instead of mandating when they must be illuminated.

14 625 ILCS 5/12-821(b) requires districts that own school buses and multifunction school activity buses to establish procedures for accepting comment calls and responding to them. In accordance with good governance principles, this duty is delegated to the superintendent. For a sample procedure, see 4:110-AP2, *Bus Driver Communication Devices; Pre-Trip and Post-Trip Inspection; Bus Driving Comments*.

15 105 ILCS 5/10-20.21a, requires all contracts for providing charter bus services to transport students to or from interscholastic athletic or interscholastic or school sponsored activities to contain clause (A) except that a contract with an out-of-state company may contain clause (B) or clause (A). The clause must be set forth in the contract's body in at least 12-point typeface and all upper case letters:

(A) "ALL OF THE CHARTER BUS DRIVERS WHO WILL BE PROVIDING SERVICES UNDER THIS CONTRACT HAVE, OR WILL HAVE BEFORE ANY SERVICES ARE PROVIDED:

(1) SUBMITTED THEIR FINGERPRINTS TO THE DEPARTMENT OF STATE POLICE IN THE FORM AND MANNER PRESCRIBED BY THE DEPARTMENT OF STATE POLICE. THESE FINGERPRINTS SHALL BE CHECKED AGAINST THE FINGERPRINT RECORDS NOW AND HEREAFTER FILED IN THE DEPARTMENT OF STATE POLICE AND FEDERAL BUREAU OF INVESTIGATION CRIMINAL HISTORY RECORDS DATABASES. THE FINGERPRINT CHECK HAS RESULTED IN A DETERMINATION THAT THEY HAVE NOT BEEN CONVICTED OF COMMITTING ANY OF THE OFFENSES SET FORTH IN SUBDIVISION (C-1)(4) OF SECTION 6-508 OF THE ILLINOIS VEHICLE CODE; AND

(2) DEMONSTRATED PHYSICAL FITNESS TO OPERATE SCHOOL BUSES BY SUBMITTING THE RESULTS OF A MEDICAL EXAMINATION, INCLUDING TESTS FOR DRUG USE, TO A STATE REGULATORY AGENCY."

(B) "NOT ALL OF THE CHARTER BUS DRIVERS WHO WILL BE PROVIDING SERVICES UNDER THIS CONTRACT HAVE, OR WILL HAVE BEFORE ANY SERVICES ARE PROVIDED:

## Pre-Trip and Post-Trip Vehicle Inspection 16

The Superintendent or designee shall develop and implement a pre-trip and post-trip inspection procedure to ensure that the school bus driver: (1) tests the two-way radio or cellular radio telecommunication device and ensures that it is functioning properly before the bus is operated, and (2) walks to the rear of the bus before leaving the bus at the end of each route, work shift, or work day, to check the bus for children or other passengers in the bus.

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The footnotes are not intended to be part of the adopted policy; they should be removed before the policy is adopted.

(1) SUBMITTED THEIR FINGERPRINTS TO THE DEPARTMENT OF STATE POLICE IN THE FORM AND MANNER PRESCRIBED BY THE DEPARTMENT OF STATE POLICE. THESE ~~FINGERPRINTS-FINGERPRINTS~~ SHALL BE CHECKED AGAINST THE FINGERPRINT RECORDS NOW AND HEREAFTER FILED IN THE DEPARTMENT OF STATE POLICE AND FEDERAL BUREAU OF INVESTIGATION CRIMINAL HISTORY RECORDS DATABASES. THE ~~FINGERPRINT-FINGERPRINTING~~ CHECK HAS RESULTED IN A DETERMINATION THAT THEY HAVE NOT BEEN CONVICTED OF COMMITTING ANY OF THE OFFENSES SET FORTH IN SUBDIVISION (C-1)(4) OF SECTION 6-508 OF THE ILLINOIS VEHICLE CODE; AND

(2) DEMONSTRATED PHYSICAL FITNESS TO OPERATE SCHOOL BUSES BY SUBMITTING THE RESULTS OF A MEDICAL EXAMINATION, INCLUDING TESTS FOR DRUG USE, TO A STATE REGULATORY AGENCY.”

16 625 ILCS 5/12-816(a) requires school districts to have a school bus pre- and post-trip inspection policy with the components as contained in this policy. See also 23 Ill.Admin.Code §1.510(i)(3) and 92 Ill.Admin.Code §458.1030. For a sample procedure, see 4:110-AP2, *Bus Driver Communication Devices; Pre-Trip and Post-Trip Inspection; Bus Driving Comments*. School districts that contract with a private sector school bus company must require the company to have a pre- and post-trip inspection policy that is equivalent to this section of the policy. 625 ILCS 5/12-816(b).

Each school bus must contain an operating two-way radio or cellular radio telecommunication device while the school bus driver is in possession of a school bus. 625 ILCS 5/12-813.1(e). “Cellular radio telecommunication device” means a device capable of sending or receiving telephone communications without an access line for service and which requires the operator to dial numbers manually; it does not include citizens band radios or citizens band radio hybrids. 625 ILCS 5/12-813.1(a). The two-way radio or cellular radio telecommunication device must be turned on and adjusted in a manner that would alert the driver of an incoming communication request. 625 ILCS 5/12-813.1(e). A school bus driver may not operate a school bus while using a cellular radio telecommunication device except in the following situations: (1) in an emergency situation to communicate with an emergency response operator; a hospital; a physician’s office or health clinic; an ambulance service; a fire department, fire district, or fire company; or a police department; (2) in the event of a “mechanical breakdown or other mechanical problem;” (3) to communicate with school authorities about bus operation or the safety of a passenger on the bus; and (4) when the bus is parked. 625 ILCS 5/12-813.1(c). However under no circumstances may the cellular radio telecommunication device be used for anything else including personal use. 625 ILCS 5/12-813.1(c)(2).

- LEGAL REF.: ~~20 U.S.C. §6312(c)(5)(B), Elementary and Secondary Education Act, 20 U.S.C. §6312(e)(5)(B).~~  
~~42 U.S.C. §11431 et seq., McKinney-Vento Homeless Assistance Act, 42 U.S.C. §11431 et seq.~~  
105 ILCS 5/10-22.22 and 5/29-1 et seq.  
105 ILCS 45/1-15 and /1-17.  
625 ILCS 5/1-148.3a-5, 5/1-182, 5/11-1414.1, ~~5/12-813~~, 5/12-813.1, 5/12-815, 5/12-816, 5/12-821, and 5/13-109.  
23 Ill.Admin.Code §§1.510 and 226.750; Part 120.  
92 Ill.Admin.Code ~~§Part~~ 440-3.
- CROSS REF.: 4:170 (Safety), 5:100 (Staff Development Program), 5:120 (Employee Ethics; Conduct; and Conflict of Interest), 5:280 (Educational Support Personnel - Duties and Qualifications), 6:140 (Education of Homeless Children), 6:170 (Title I Programs), 7:220 (Bus Conduct)
- ADMIN. PROC.: 4:110-AP2 (Bus Driver Communication Devices; Pre-Trip and Post-Trip Inspection; Bus Driving Comments), 4:110-AP3 (School Bus Safety Rules), 4:110-E (Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses), 6:140-AP (Education of Homeless Children)

## Operational Services

### Administrative Procedure - School Bus Post-Accident Checklist 1

#### Driver Post-Accident Procedures

1. Immediately after an accident:

- Activate the hazard lights
- Place the transmission in neutral and set the parking brake (manual) or place in park (automatic)
- Turn off the ignition and remove the key
- Locate and place the warning devices

~~1-2.~~ The first consideration is whether it is safer to evacuate the students or to have them remain on the bus. 23 Ill.Admin.Code §1.510(I)(1).

~~2-3.~~ Check for injuries, using the passenger list (if available) to indicate injuries. Immediately notify the pre-designated emergency and police services, and administer first aid. As soon as possible, notify the District or transportation office.

~~4.~~ Don't leave students unattended and/or unsupervised. However, if you must leave to attend to the vehicle or warning devices, leave a responsible student in charge.

~~5.~~ Check for conditions that could cause fires, including a ruptured fuel tank, leaking or broken fuel lines; and/or hot tire, etc. Do not touch a suspected hot tire. Place your hand near it to see if heat is radiating off of it.

~~3-6.~~ When notifying the District or transportation office, give the following information:

- Seriousness of the accident
- Location and time of ~~incident~~accident
- Bus number and route number
- School
- Number of students on board
- Extent of any injuries
- Condition of vehicle
- Weather/road conditions
- Any other pertinent information

~~4-7.~~ Never leave your vehicle, either to check traffic or set out reflectors, when children are on board. Stay with the children until help arrives. Do not release any student, even to parents, unless instructed to do so by police or the District or transportation office. Parents/guardians are not allowed on the bus.

~~5.~~ Set out reflectors, flares, flags, etc. only when the safety of all children is secure.

~~6-8.~~ Stay vigilant for the continued safety of everyone at the scene and:

The footnotes should be removed before the material is used.

<sup>1</sup> This checklist aligns with accident procedures in the Illinois Professional School Bus Driver Training Curriculum (last revised 2015), available at: [www.isbe.net/Documents/busdriver\\_trainmanual.pdf](http://www.isbe.net/Documents/busdriver_trainmanual.pdf). Modifications to this procedure may be needed to reflect local circumstances, e.g., regarding the identification of a "responsible student" in item #4 under Driver Post-Accident Procedures.

Never attempt to direct traffic.

Never move the vehicle before the police arrive, unless absolutely necessary to avoid a traffic hazard.

Never discuss liability or fault, or sign anything until someone from the District or transportation office arrives. Do not discuss details of the accident with the media.

Never move an injured person unless the person's life is in jeopardy.

9. Cooperate with law enforcement. Provide concise and clear answers and details. Give your name, address, driver's license and bus driver permit numbers.

7-10. If your vehicle strikes an animal ~~(pet)~~, continue until it is safe to stop, keeping in mind that the sight of an injured ~~pet~~ animal could upset the children on the bus. Park the vehicle and radio or call the District or transportation office with the information. The office will notify the proper authorities.

8-11. The District or transportation office, when notifying the school, may suggest that personnel follow up with students to minimize trauma or emotional after-effects.

### Information Gathering

While at the accident scene the driver and/or transportation supervisor shall:

1. Obtain the name ~~and age, address, date of birth, and seating position~~ of every passenger on the bus.
2. If possible, obtain the names, addresses, driver's license numbers and address/phone numbers of all witnesses.
3. Regarding other vehicles involved in the accident, obtain the:
  - Other drivers' names
  - Other drivers' license numbers
  - Other drivers' addresses and phone numbers
  - Make, model, year, and license plate numbers of other involved vehicles
  - Other drivers' insurance carrier information
  - Name, address, and phone numbers of passengers in other involved vehicles

### District or Transportation Office Responsibilities

1. Confirm that police and emergency services as appropriate were notified. An ambulance need not be called to the accident scene unless there are obvious injuries or complaints.
2. Send a transportation supervisor to the accident scene to assist the bus driver.
3. Arrange for the parents/guardians of children on the bus to be contacted.
4. Arrange alternate transportation for the children.
5. Contact the District's insurance carrier as soon as possible and follow its instructions.
6. Help the bus driver complete accident report forms, including insurance forms. Complete ISBE's the Ill. State Board of Education's School Bus Accident Report, [www.isbe.net/Documents/50-26-school-bus-accident.pdf](http://www.isbe.net/Documents/50-26-school-bus-accident.pdf), [www.isbe.net/Documents/50-26-school-bus-accident.pdf](http://www.isbe.net/Documents/50-26-school-bus-accident.pdf) and forward to the Regional Superintendent immediately after any accident.
7. Obtain any accident reports completed by third parties, including police reports.

### Post-Accident Alcohol and Drug Testing

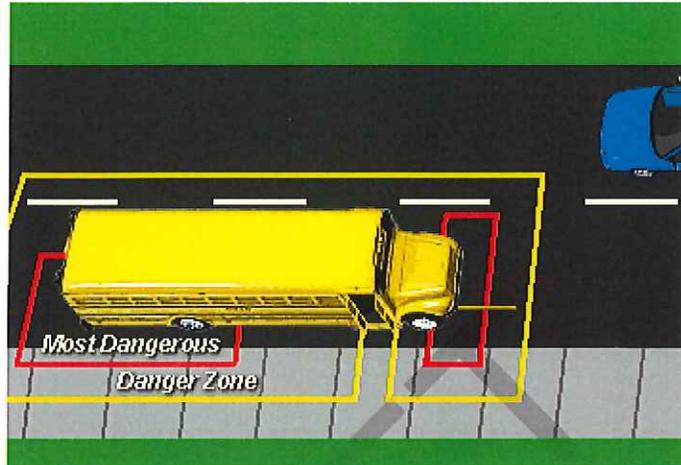
1. This section's provisions are required by 49 C.F.R. §382.303. For drug and alcohol testing requirements, see [Board](#) policy 5:285, *Drug and Alcohol Testing for School Bus and Commercial Vehicle Drivers*; and administrative procedure 5:285-AP, *Drug and Alcohol Testing for School Bus and Commercial Vehicle Drivers*.
2. School bus drivers shall be provided the necessary post-accident alcohol and drug testing information, procedures, and instructions before operating a bus.
3. As soon as practicable after an accident involving a school bus, the driver shall be tested for alcohol and controlled substances if:
  - a. The accident involved the loss of human life;
  - b. The driver receives a citation for a moving traffic violation arising from the accident; or
  - c. A law enforcement officer directs that such a test be given. 625 ILCS 5/6-516.
4. If a required alcohol test is **not** administered:
  - a. Within ~~2~~[two](#) hours, the District must prepare and maintain a file or record stating why the test was not properly administered.
  - b. Within ~~8~~[eight](#) hours, the District shall cease attempts to administer an alcohol test and shall prepare the same record.
5. If a required controlled substance test is **not** administered within 32 hours, the District shall cease attempts to administer the test, and shall prepare and maintain a file or record stating why the test was not properly administered.
6. No driver required to take a post-accident alcohol test shall use alcohol for [8](#) hours following the accident, or until undergoing a post-accident alcohol test.

### Vehicle Inspection

Following an accident, each damaged bus component must be inspected before the bus is returned to service. 625 ILCS 5/13-109.

## Operational Services

### Administrative Procedure - School Bus Safety Rules <sup>1</sup>



The Building Principal shall distribute the following rules to all students. Those students not qualifying for school bus transportation to and from school should receive a copy because they may from time-to-time be transported to school activities by school bus.

1. Be aware of moving traffic and pay attention to your surroundings.
- 1.2. Dress properly for the weather. Make sure all drawstrings, ties, straps, etc. on all clothing, backpacks and other items, are shortened or removed to lessen the likelihood of them getting caught in bus doors, railings or aisles.
- 2.3. Arrive on time at the bus stop, and stay away from the street while waiting for the bus.
- 3.4. Stay away from the bus until it stops completely and the driver signals you to board. Enter in single file without pushing. Always use the handrail.
- 4.5. Take a seat right away and remain seated facing forward. Keep your hands, arms, and head inside the bus.
- 5.6. Talk quietly on the bus. No shouting or creating loud noises that may distract the driver. Tablets, iPods®, iPads®, smart phones, and other electronic devices must be silenced on the bus unless a student uses headphones.
- 6.7. Help keep the bus neat and clean. Keep belongings out of the aisle and away from emergency exits. Eating and drinking are not allowed on the bus.
- 7.8. Always listen to the driver's instructions. Be courteous to the driver and other students. Sit with your hands to yourself and avoid making noises that would distract the driver or bother other passengers. ~~Remain seated, keeping your hands, arms, and head inside the bus at all times.~~

The footnotes should be removed before the material is used.

<sup>1</sup> 105 ILCS 5/10-20.14 requires each district's parent-teacher advisory committee, in cooperation with school bus personnel, to establish and maintain bus safety rules. The parent-teacher advisory committee's guidelines should be appropriate to the district, e.g., they should include instructions on seat belt use when buses are so equipped.

~~8.9.~~ Wait until the bus pulls to a complete stop before standing up. Use the handrail when exiting the bus.

~~9.10.~~ Stay out of the danger zone next to the bus where the driver may have difficulty seeing you. Take at least five giant steps (10 feet) away from the bus and out of the danger zone, until you can see the driver and the driver sees you. Never crawl under a bus.

~~10.11.~~ If you must cross the street after you get off the bus, wait for the driver's signal and then cross in front of the bus. Cross the street only after checking both ways for traffic, even after the driver's signal.

~~11.12.~~ Never run back to the bus, even if you dropped or forgot something.

Additional resources follow:

National Highway Traffic Safety Administration - **TrafficSchool Bus Safety Toolkit**  
~~one.nhtsa.gov/Driving-Safety/Community-Traffic-Safety/Community-Traffic-Safety-Toolkit~~  
[https://one.nhtsa.gov/people/injury/buses/getting\\_to\\_school/schoolbus2.html](https://one.nhtsa.gov/people/injury/buses/getting_to_school/schoolbus2.html)

U.S. Department of Transportation - **School Bus Safety Campaign Material**  
[www.trafficsafetymarketing.gov/get-materials/school-bus-safety/evergreen-campaign-material](http://www.trafficsafetymarketing.gov/get-materials/school-bus-safety/evergreen-campaign-material)

National Safety Council - **School Bus Safety Rules Tips for a Safe Ride**  
~~www.nsc.org/news\_resources/Resources/Documents/School\_Bus\_Safety\_Rules.pdf~~  
~~Illinoiswww.nsc.org/home-safety/tools-resources/seasonal-safety/back-to-school/bus~~

III. State Police - **School Bus Safety**  
[www.isp.state.il.us/docs/schoolbussafety5542.pdf](http://www.isp.state.il.us/docs/schoolbussafety5542.pdf)

ISBEIII. State Board of Education - **School Bus Safety What Parents Should Know**  
[www.isbe.net/Documents/bus\\_safety\\_parents.pdf](http://www.isbe.net/Documents/bus_safety_parents.pdf)

ISBEIII. State Board of Education - **Instructions To School Bus Riders (pg. 102)**  
[www.isbe.net/Documents/bus\\_ride\\_instruct.pdf](http://www.isbe.net/Documents/bus_ride_instruct.pdf)

ILSOSIII. Sec. of State - **Parent information flyer, games etc.**  
[www.cyberdriveillinois.com/departments/drivers/traffic\\_safety/school\\_bus\\_safety/home.html](http://www.cyberdriveillinois.com/departments/drivers/traffic_safety/school_bus_safety/home.html)

**Operational Services**

**Exhibit - Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses**

The purpose of this form is to give school bus drivers and/or emergency medical technicians information about ~~children~~ students who have special needs or medical conditions. One copy of this form is kept in the nurse's office, and another copy is kept on the student's school bus in a secure location for bus drivers and emergency medical technicians. If the emergency care of the student requires medication, the parent/guardian must file a *School Medical Authorization Form* with the school nurse.

*To be completed by the student's parent/guardian:*

_____ Student's Name <i>(Please print)</i>		_____ Birth Date
_____ Parent/Guardian's Name	_____ Home Phone	_____ Cell Phone
_____ School	_____ Grade	_____ Teacher
_____ Physician's Name	_____ Physician's Phone	_____ School Nurse's Phone

**My child's special needs are:** *(list behavioral or communication challenges and required responses)*

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**My child requires medication for:** *(describe conditions and circumstances)*

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Medication and Where Kept	Dosage	Directions

\_\_\_\_\_  
Parent/Guardian Signature

\_\_\_\_\_  
Date

## Operational Services

### Facility Management and Building Programs <sup>1</sup>

The Superintendent shall manage the District's facilities and grounds as well as facility construction and building programs in accordance with the law, the standards set forth in this policy, and other applicable School Board policies. The Superintendent or designee shall facilitate: (1) inspections of schools by the Regional Superintendent and State Fire Marshal or designee, ~~and~~ (2) review of plans and specifications for future construction or alterations of a school if requested by the relevant municipality, county (if applicable), or fire protection district, ~~and~~ (3) [compliance with the 10-year safety survey process required by the School Code](#). <sup>2</sup>

### Standards for Managing Buildings and Grounds

All District buildings and grounds shall be adequately maintained in order to provide an appropriate, safe, and energy efficient physical environment for learning and teaching. The Superintendent or designee shall provide the Board with periodic reports on maintenance data and projected maintenance needs that include cost analysis. Prior Board approval is needed for all renovations or permanent alterations to buildings or grounds when the total cost will exceed \$12,500, including the cost

~~The footnotes are not intended to be part of the adopted policy; they should be removed before the policy is adopted.~~

<sup>1</sup> Each district with a school having 50 or more students must have a green school cleaning policy. Green Cleaning School Act, 105 ILCS 140/ ~~IASB sample~~ See policy 4:160, *Environmental Quality of Buildings and Grounds*, which fulfills the requirement to have a procedure on compliance with the Chemical Safety Acts. 105 ILCS 5/10-20.49. Many other State and federal laws control facility management and building programs. Good subjects for administrative procedures include management of custodial services, security, and green cleaning, among others.

The federal rules implementing the Americans with Disabilities Act of 1990 (ADA, 42 U.S.C. §12101 ~~et seq.~~) prohibit discrimination on the basis of disability in services and facilities. 28 C.F.R. Parts 35 and 36. The 2010 ADA Standards for Accessible Design (28 C.F.R. Part 36, Appendix) are available from a link on the ADA home page, [www.ada.gov/](http://www.ada.gov/). Consult the board attorney about how these standards apply to alterations and new construction.

The Prevailing Wage Act is generally applicable to all construction projects. 820 ILCS 130/ ~~amended by P.A. 100-1177, eff. 6-1-19~~. It requires, among other things, that: (1) all workers on a public works project be paid no less than the prevailing hourly rate (820 ILCS 130/1); (2) the district specify in all public works contracts that the prevailing rate must be paid (820 ILCS 130/4 ~~(a-1), amended by P.A. 100-1177, eff. 6-1-19~~); and (3) ~~until such time as the Ill. Dept. of Labor activates an electronic database for certified payrolls~~, all contractors must submit certain employment records to the district, and the district must keep these records as required by law (820 ILCS 130/5, ~~amended by P.A. 100-1177, eff. 6-1-19~~).

105 ILCS 5/10-20.60 ~~(final citation pending)~~, <sup>63</sup>, added by P.A. 100-163, ~~eff. 1-1-18~~, requires school districts to make feminine hygiene products (defined as tampons and sanitary napkins for use in connection with the menstrual cycle) available, at no cost to students, in the bathrooms of school buildings serving students in grades 6 through 12. Note: The statute does not delineate between types of bathrooms (student, staff, girls, boys, unisex, etc.). Consult with the board attorney about implementing this law.

<sup>2</sup> ~~105 ILCS 5/2-3.12~~, 105 ILCS 5/3-14.20, and 5/3-14.21.

Use this alternative for districts in suburban Cook County: replace "Regional Superintendent" with "appropriate Intermediate Service Center."

~~105 ILCS 5/2-3.12 and 23 Ill.Admin.Code Part 180 contain the school building code and Health/Life and Safety Code for Public Schools (HLS Code), respectively. The board must hire a licensed architect or engineer to conduct a decennial inspection of its school buildings and produce a ten-year safety survey report, which is submitted to the Regional Superintendent (ROE) or Intermediate Service Center (ISC) and the State Superintendent for approval. The board must also report to the ROE or ISC annually on its completion of the report recommendations to comply with the HLS Code. See the Health Life Safety Handbook at [www.isbe.net/Pages/Health-and-Life-Safety.aspx](http://www.isbe.net/Pages/Health-and-Life-Safety.aspx) for more information about the safety survey process.~~

equivalent of staff time.<sup>3</sup> This policy is not intended to discourage efforts to improve the appearance of buildings or grounds that are consistent with the designated use of those buildings and grounds.

#### Standards for Green Cleaning <sup>4</sup>

For each District school with 50 or more students, the Superintendent or designee shall establish and supervise a green cleaning program that complies with the guidelines established by the Illinois Green Government Coordinating Council.

#### Standards for Facility Construction and Building Programs <sup>5</sup>

As appropriate, the Board will authorize a comprehensive study to determine the need for facility construction and expansion. On an annual basis, the Superintendent or designee shall provide the Board with projected facility needs, enrollment trends, and other data impacting facility use. Board approval is needed for all new facility construction and expansion.

Commented [DJ1]: The first deleted sentence in f/n 5 has been moved to f/n 2.

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<sup>3</sup>This provision is optional and the amount may be changed. The \$12,500 spending limit is one-half of the bidding threshold for purchases or contracts. 105 ILCS 5/10-20.21. This provision's intent is to ensure that the board is kept informed about significant renovations and permanent alterations. A board should discuss this provision with its superintendent before including it in the policy.

<sup>4</sup> Required by the Green Cleaning School Act (105 ILCS 140/) and Green Cleaning for Elementary and Secondary Schools (23 Ill.Admin.Code Part 2800). The Ill. Green Government Coordinating Council established *Guidelines and Specifications* which state: "While not mandatory, schools should implement the practices set forth in the Recommendations section of these guidelines where applicable and appropriate." See ~~Guidelines and Specifications at: www.illinois.gov/gov/green/Documents/Illinois%20Green%20Cleaning%20Guidelines%20and%20Specifications.pdf~~ See *Guidelines and Specifications* at: <https://www2.illinois.gov/sites/green/Pages/GreenCleaning.aspx>.

<sup>5</sup> The inclusion and identification of the facility goals listed in the second paragraph are at the board's discretion. 105 ILCS 5/2-3.12 and 23 Ill.Admin.Code Part 180 contain the ~~School building code and Health/Life and Safety Code for Public Schools, respectively. Among their mandates are the decennial safety survey report.~~ 105 ILCS 5/2-3.12(b); 23 Ill.Admin.Code §180.310. After 1-1-15, all "new school building construction" must include a storm shelter that meets or exceeds the ICC/NSSA Standard for the Design and Construction of Storm Shelters (ICC-500) published jointly by the International Code Council and the National Storm Shelter Association. 105 ILCS 5/2-3.12(e-5); 23 Ill.Admin.Code §180.60(b)(3). Any facility project for which the design contract is executed after 7-1-16 must meet standards of the 2015 International Building Code and its subcodes. 23 Ill.Admin.Code 180.60(a).

The Ill. Environmental Barriers Act (IEBA) (410 ILCS 25/) and the Ill. Accessibility Code (IAC) (71 Ill.Admin.Code Part 400) ensure that "all applicable buildings and facilities the built environment in the State of Illinois is so designed, constructed, and/or altered to assure the safety and welfare of all members of society and altered to be readily accessible to, and usable by, environmentally limited persons." all, including individuals with disabilities." 71 Ill.Admin.Code §400.110(a). ~~Note: The Ill. Environmental Barriers Act, as amended by P.A. 99-582, deleted the term environmentally limited person, which until then had been defined in 410 ILCS 25/3 as "a person with a disability or condition who is restricted in the use of the built environment."~~ ~~Note: Press boxes constructed on school property do not have to comply with the Accessibility Code IAC if the press boxes are in bleachers that have points of entry at only one level, and the aggregate area of the press box is no more than 500 square feet.~~ 105 ILCS 5/10-20.51; 23 Ill.Admin.Code 180.60(b)(4).

A building intended for classroom or instructional use may be constructed only after voter approval at a referendum unless the building is: (1) leased by the district, or (2) purchased with funds from the sale or disposition of other buildings or structures, or with funds received as a grant under the School Construction Law or as a gift, provided that no funds (other than lease payments) are derived from the district's bonded indebtedness or its tax levy. 105 ILCS 5/10-22.36.

A district may levy a tax for "fire prevention, safety, energy conservation, disabled accessibility, school security, and specified repair purposes." 105 ILCS 5/17-2.11. An expedited process may be available in emergency situations. Id. A board may, subject to certain notice requirements, transfer surplus life safety taxes and interest earnings on them to the Operations and Maintenance Fund for building repair work until June 30, 2019. Id., amended by P.A. 99-713/100-465.

The Green Buildings Act requires all new State-funded building construction and major renovation projects to meet specified environmental requirements. 20 ILCS 3130/. Waivers may be granted by the Capital Development Board in certain situations. 20 ILCS 3130/15(e). For environmental impact laws, see policy 4:160, *Environmental Quality of Buildings and Grounds*.

When making decisions pertaining to design and construction of school facilities, the Board will confer with members of the staff and community, the [Illinois](#), State Board of Education, and educational and architectural consultants, as it deems appropriate. The Board's facility goals are to:

1. Integrate facilities planning with other aspects of planning and goal-setting.
2. Base educational specifications for school buildings on identifiable student needs.
3. Design buildings for sufficient flexibility to permit new or modified programs.
4. Design buildings for maximum potential for community use.
5. Meet or exceed all safety requirements.
6. Meet requirements on the accessibility of school facilities to disabled persons as specified in State and federal law.
7. Provide for low maintenance costs, energy efficiency, and minimal environmental impact.

#### Naming Buildings and Facilities <sup>6</sup>

Recognizing that the name for a school building, facility, or ground or field reflects on its public image, the Board's primary consideration will be to select a name that enhances the credibility and stature of the school or facility. Any request to name or rename an existing facility should be submitted to the Board.<sup>7</sup> When a facility is to be named or renamed, the Board President will appoint a special committee to consider nominations and make a recommendation, along with supporting rationale, to the Board. The Board will make the final selection. The Superintendent or designee may name a room or designate some area on a school's property in honor of an individual or group that has performed outstanding service to the school without using the process in this policy.

LEGAL REF.: 42 U.S.C. §12101 *et seq.*, Americans with Disabilities Act of 1990, implemented by 28 C.F.R. Parts 35 and 36.  
20 ILCS 3130/, Green Buildings Act.  
105 ILCS 5/2-3.12, 5/10-20.49, 5/10-22.36, 5/10-20.6360 (P.A. 100-163, final citation pending); and 5/17-2.11.  
105 ILCS 140/, Green Cleaning Schools Act.  
105 ILCS 230/, School Construction Law.  
410 ILCS 25/, Environmental Barriers Act.  
820 ILCS 130/, Prevailing Wage Act.  
23 Ill.Admin.Code Part 151, School Construction Program; Part 180, Health/Life Safety Code for Public Schools; and Part 2800, Green Cleaning for Elementary and Secondary Schools.  
71 Ill.Admin.Code Part 400, Ill. Accessibility Code.

CROSS REF.: 2:150 (Committees), 2:170 (Procurement of Architectural, Engineering, and Land Surveying Services), 4:60 (Purchases and Contracts), 8:70 (Accommodating Individuals with Disabilities)

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<sup>6</sup> This section is optional and its contents are at the board's discretion.

<sup>7</sup> The board may want to include criteria for the committee, in which case the following is an option:

1. The committee will encourage input from the community, staff members, and students.
2. Consideration will be given to names of local communities, neighborhoods, streets, landmarks, historical considerations, and individuals who have made a contribution to the District, community, State, or nation.
3. The name will not duplicate or cause confusion with the names of existing facilities in the District.

## Operational Services

### Environmental Quality of Buildings and Grounds 1

The Superintendent shall take all reasonable measures to protect: (1) the safety of District personnel, students, and visitors on District premises from risks associated with hazardous materials, and (2) the environmental quality of the District's buildings and grounds.<sup>2</sup> Before pesticides are used on District premises, the Superintendent or designee shall notify employees and parents/guardians of students as

**The footnotes are not intended to be part of the adopted policy; they should be removed before the policy is adopted.**

<sup>1</sup> State and/or federal law control this policy's content and require districts to:

1. Have a procedure to comply with the Structural Pest Control Act (~~225 ILCS 235/~~) and the Lawn Care Products Application and Notice Act (~~405 ILCS 5/10-20.4-65/~~). See 4:160-AP, ~~Administrative Procedure—Environmental Quality of Buildings and Grounds.~~
2. Designate a staff person to be responsible for district compliance with the safety acts listed in #1 above. This policy designates the superintendent or designee.

Many State and federal laws regulate the environmental quality of schools. For example:

1. Several federal laws regulate asbestos as a hazardous substance, the most significant for schools being the Asbestos Hazard Emergency Response Act of 1986. 15 U.S.C. § 2641 et seq. The Asbestos Abatement Act, 105 ILCS 105/, requires schools to perform a variety of functions regarding asbestos.
2. The Indoor Air Quality Act, 410 ILCS 87/. The Ill. Dept. of Public Health Guidelines for Indoor Air Quality are advisory, i.e., not enforceable.  
[www.idph.state.il.us/envhealth/factsheets/indoorairqualityguide\\_fs.htm](http://www.idph.state.il.us/envhealth/factsheets/indoorairqualityguide_fs.htm)
3. The Smoke-Free Illinois Act, 410 ILCS 82/, bans tobacco smoking inside schools.
4. The Structural Pest Control Act, 225 ILCS 235/ requires the Ill. Dept. of Public Health to establish guidelines for an integrated pest management program for schools. See: [www.idph.state.il.us/envhealth/ipm/index.htm](http://www.idph.state.il.us/envhealth/ipm/index.htm), or [www.idph.state.il.us/envhealth/entpestfshts.htm](http://www.idph.state.il.us/envhealth/entpestfshts.htm).
5. Notices to employees and parents/guardians before pesticide applications are required by the Structural Pest Control Act (~~225 ILCS 235/10.3/~~). The Lawn Care Products Application and Notice Act requires similar notices but only to parents/guardians (~~415 ILCS 65/3/~~).
6. The Green Cleaning School Act, 105 ILCS 140/, and Green Cleaning for Elementary and Secondary Schools, 23 Ill.Admin.Code Part 2800, contain guidelines for green cleaning. See policy ~~4:150, Facility Management and Building Program Programs.~~
7. The Green Buildings Act requires all new State-funded building construction and major renovation projects to meet specified environmental requirements (~~20 ILCS 3130/~~).<sup>2</sup> Waivers may be granted by the Capital Development Board in certain situations (~~Id.~~).
8. The Ill. legislature recommended that each occupied school building be tested every five years for radon and provided a process for the screening in 105 ILCS 5/10-20.48.

Employers must provide all employees with an education and training program with respect to all toxic substances to which an employee is routinely exposed while working (~~820 ILCS 255/16/; 23 Ill.Admin.Code § 1.330/~~). However, this section and most of the Toxic Substances Disclosure to Employees Act (820 ILCS 255/) are ~~inoperative~~; its implementing rules (56 Ill.Admin.Code Part 205) were repealed. Instead, the Ill. Dept. of Labor enforces the federal Occupational Safety and Health Administration Hazard Communication Standards at 29 C.F.R. § 1910.1200 (~~820 ILCS 255/1.5/~~). Thus, school districts must follow the federal disclosure and training requirements.

<sup>2</sup> A board persuaded by #8 in the above footnote may add the following option:

If economically feasible, the Superintendent or designee shall manage the testing of each occupied school building for radon pursuant to Section 10-20.48 of the School Code.

A board may want to add the following option if it is concerned that employees who are eligible for district-paid hepatitis B vaccination are unaware of their eligibility:

The Superintendent or designee shall notify all employees who must be offered, according to State or federal law, District-paid hepatitis B vaccine and vaccination.

required by the Structural Pest Control Act, 225 ILCS 235/, and the Lawn Care Products Application and Notice Act, 415 ILCS 65/. 3

LEGAL REF.: 29 C.F.R. §1910.1030, Occupational Exposure to Bloodborne Pathogens, as adopted by the Illinois Department of Labor, §6 Ill.Admin.Code §350.300(e)-700(b).  
29 C.F.R. §1910.1200, Occupational Safety and Health Administration Hazard Communication Standards, as adopted by 820 ILCS 255/1.5, Toxic Substances Disclosure to Employees Act.  
20 ILCS 3130/, Green Buildings Act.  
105 ILCS 5/10-20.17a; 5/10-20.48; ~~135/; and~~ 105 ILCS 135/, Toxic Art Supplies in Schools Act.  
105 ILCS 140/, Green Cleaning School Act.  
225 ILCS 235/, Structural Pest Control Act.  
415 ILCS 65/, Lawn Care Products Application and Notice Act.  
820 ILCS 255/, Toxic Substances Disclosure to Employees Act. (*inoperative*)  
23 Ill.Admin.Code §1.330, ~~Toxic Materials Training.~~

Commented [DJ1]: Prior citation was repealed and renumbered.

CROSS REF.: 4:150 (Facility Management and Building Programs), 4:170 (Safety)

**The footnotes are not intended to be part of the adopted policy; they should be removed before the policy is adopted.**

<sup>3</sup> Different requirements pertain to the notices in the Structural Pest Control Act (225 ILCS 235/10.3) and the Lawn Care Products Application and Notice Act (415 ILCS 65/3(f)). Both require notice to parents/guardians. Notice to employees is only required by the Structural Pest Control Act. For the sake of simplicity, the sample policy requires notice to employees before pesticides are used. Notice at least 4four business days before application is required by Lawn Care Products Application and Notice Act; notice at least ~~2two~~ business days is required by the Structural Pest Control Act.

If a registry is maintained, replace the following alternative is used, omit the policy's last sentence with this alternative:

The Superintendent or designee shall maintain a registry of employees and parents/guardians of students requesting notification before the application of pesticide(s) and notify those people as required by the Structural Pest Control Act, 225 ILCS 235/, and the Lawn Care Products Application and Notice Act, 415 ILCS 65/.

Be sure the notice provisions in the policy and its implementing administrative procedure are consistent.

## Operational Services

### Administrative Procedure - Environmental Quality of Buildings and Grounds

#### Hazardous and/or Infectious Materials

The Buildings and Grounds Supervisor is responsible for the District's compliance with State and federal law concerning toxic, hazardous, and/or infectious materials.<sup>1</sup> This includes requirements in the federal Occupational Safety and Health Administration (OSHA) *Hazard Communication Standards* (29 C.F.R. §1910.1200), adopted by the State Toxic Substances Disclosure to Employees Act (820 ILCS 255/, otherwise inoperative). See information on OSHA's website at [www.osha.gov/dsg/hazcom/index.html](http://www.osha.gov/dsg/hazcom/index.html).

#### Pesticide Application on School Grounds<sup>2</sup>

The Buildings and Grounds Supervisor is responsible for compliance with the Lawn Care Products Application and Notice Act (415 ILCS 65/3) and shall:

1. Provide an annual schedule of pesticide application to the supervisor of each District building.
2. In coordination with the supervisor of each District building (including each Building Principal), notify employees and students and their parents/guardians in each building. The notification must:
  - a. Be provided at least 4four business days before a pesticide application on school grounds.
  - b. Be written or by telephone. If written, the notice may be included in newsletters, calendars, or other correspondence currently being published.
  - c. Identify the intended date of the application.
  - d. Provide the name and telephone contact number for the Buildings and Grounds Supervisor or other school personnel responsible for the pesticide program.

~~An exception to this notification~~ Prior notice is permitted not required if there is an imminent threat to health or property, ~~in which case the Lawn Care Products Application and Notice Act shall control exists.~~ If such a situation arises, the Building and Grounds Supervisor must sign a statement describing the circumstances that gave rise to the health threat and ensure that written or telephonic notice is provided as soon as practicable.

~~The footnotes should be removed before the material is used.~~

<sup>1</sup> Alternatively, these duties may be given to another staff member, in which case that staff member's title should replace "Buildings and Grounds Supervisor" throughout this procedure.

<sup>2</sup> Notice to parents/guardians of students is required before pesticides are applied on school grounds (see the Lawn Care Products Application and Notice Act, 415 ILCS 65/3~~(d)~~). Notice to employees, while not required, is included in this procedure because notice to employees is mandated by the Structural Pest Control Act, 225 ILCS 235/10.3. Item #1 is not legally required. Items #2a-d are required. The district may alternatively maintain a registry of parents/guardians requesting written notification of pesticide application and notify only those people in the registry. Be sure the notice provision is consistent with board policy.

### Pesticide Application in School Buildings and Structures <sup>3</sup>

The Buildings and Grounds Supervisor is responsible for compliance with the requirements in the Structural Pest Control Act (225 ILCS 235/) and shall:

1. Provide an annual schedule of pesticide application to the supervisor of each District building.
2. In coordination with the supervisor of each District building (including each Building Principal):
  - a. Maintain a registry of all employees and parents/guardians of students.
  - b. Notify those employees and parents/guardians of students before pesticides are applied in or on each building. The notification must:
    - i. Be provided at least two business days before a pesticide application in or on school buildings.
    - ii. Be written. The notice may be included in newsletters, bulletins, calendars, or other correspondence currently being published.
    - iii. Identify the intended date of the application.
    - iv. Provide the name and telephone contact number for the Buildings and Grounds Supervisor or other school personnel responsible for the pesticide program.

~~An exception to this notification~~ Prior notice is permitted not required if ~~there is~~ an imminent threat to health or property, in which case the Structural Pest Control Act shall control ~~exists~~. If such a situation arises, the Building and Grounds Supervisor must sign a statement describing the circumstances that gave rise to the health threat and ensure that written notice is provided as soon as practicable.

The Buildings and Grounds Supervisor is responsible for the District's integrated pest management program and the District's compliance with the Structural Pest Control Act ~~(~~ 225 ILCS 235/).

- Applicable if the Superintendent determines that an integrated pest management program is economically feasible:*

The Buildings and Grounds Supervisor or designee shall: (1) develop and implement a program incorporating the Department of Public Health guidelines; (2) notify the Department, on forms provided by the Department, that a program is being implemented; (3) repeat the notification every five years after the initial notification; and (4) keep copies of all notifications and all written integrated pest management program plans.

- Applicable if the Superintendent determines that adopting an integrated pest management program is not economically feasible because such adoption would result in an increase in pest control costs:*

The Buildings and Grounds Supervisor or designee shall: (1) notify the Department, on forms provided by the Department, that the development and implementation of an integrated pest management program is not economically feasible; (2) include in the notification the projected pest control costs for the term of the pest control program and projected costs for implementing a program for that same time period; (3) repeat this notification every five years after the initial notification until a

~~The footnotes should be removed before the material is used.~~

<sup>3</sup> Item #1 is not legally required. The *registry* identified in item #2a is required by the Structural Pest Control Act, 225 ILCS 235/10.3. However, for ease of compliance, the procedure automatically puts all employees and parents/guardians in the registry. Change #2a as follows if the superintendent prefers to limit the registry to only those who expressed interest in being notified: "Maintain a registry of all employees and parents/guardians who have requested to receive notice before pesticides are applied to school property." The notice described in item #2b, i-iv, is mandatory. Be sure the notice provision is consistent with board policy.

program is developed and implemented; and (4) attend a training course, approved by the Department, on integrated pest management and repeat attendance every ~~5~~five years thereafter until a program is developed and implemented in the District's schools.

The Buildings and Grounds Supervisor or designee shall maintain copies of all notifications that are required by the Structural Pest Control Act and provide the Building Principal(s) or designee(s) sufficient information to allow him/her/them to inform all parents/guardians and school employees at least once each school year that the District has met its notification requirements.

#### Training and Necessary Equipment

Each Building Principal and noncertificated staff supervisor shall ensure that all staff members under his or her supervision receive training on the safe handling and use of hazardous materials as required by 105 ILCS 5/10-20.17a. Emergency response and evacuation plans must be a part of the training.

Before an employee is given an assignment where contact with blood or bodily fluids or other hazardous material is likely, the employee must be provided the necessary training, including training in the universal precautions and other infection control measures to prevent the transmission of communicable diseases and/or to reduce potential health hazards as required by 23 Ill.Admin.Code §1.330. The appropriate supervisor shall maintain an attendance record of an employee's participation in the training.

#### Substitute Non-Hazardous Materials

District staff shall comply with State law governing toxic art supplies in schools, 105 ILCS 135/. This includes substituting non-hazardous material for hazardous substances whenever possible and minimizing the quantity of hazardous substances stored in school facilities. No art or craft material containing a toxic substance shall be ordered or purchased for use through grade 6; material containing toxic substances may be used in grades 7 through 12 only if properly labeled according to State law.

#### Infectious Materials

The Buildings and Grounds Supervisor shall prepare and distribute to all employees an Occupational Exposure Control Plan to eliminate or minimize occupational exposure to potentially infectious materials.<sup>4</sup> The Plan shall comply with the Bloodborne Pathogens Standards adopted by State and federal regulatory agencies and an updated copy given to the Superintendent annually. The Plan shall address the following issues:

1. Exposure determination. Positions that do not subject the employee to occupational exposure are generally exempt from the Plan and the Standards.
2. Implementation schedule specifying how and when risks are to be reduced. The Standards are very specific on risks reduction, e.g., Universal Precautions must be followed; engineering and work practice controls are specified (hand washing, restricted food areas); personal protection equipment must be provided; housekeeping requirements are specified (regulated waste disposal and laundry); vaccination requirements (all employees who have occupational

**The footnotes should be removed before the material is used.**

<sup>4</sup> The federal regulatory agency administering the Occupational Safety and Health Act (OSHA) issued Bloodborne Pathogens Standards (29 C.F.R. Part 1910.1030) that were adopted by the ~~Illinois~~Ill. Department of Labor (56 Ill. Admin. Code §350.~~300~~700). The Standards were developed to reduce the risk of occupational exposure to bloodborne pathogens. According to the Standards, "occupational exposure" means reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties. The Standards require employers to institute a written Exposure Control Plan containing the elements in the sample procedures.

exposure must be offered, at employer expense, the hepatitis B vaccine and vaccination series); communication of hazards to employees through labeling and training; and recordkeeping.

3. Process for ensuring that all medical evaluations and procedures, including the hepatitis B vaccine and vaccination series and post-exposure evaluation and follow-up, are available as required by law.
4. Procedures for evaluating an exposure incident.

#### Emergency Response Plan

The Building Principal shall ensure that proper procedures for the cleanup of potentially hazardous material spills are followed including the following:

1. A building custodian is responsible for the actual cleanup,
2. Personal protective equipment, chemical neutralization kits, and absorbent material are available in each building at all times, and
3. Spill residue is placed in containers designated for such purpose and disposed of in compliance with local, State, and federal law.

#### Evacuation

The Building Principal shall ensure compliance with the School Safety Drill Act, 105 ILCS 128/. This includes, among other things, ensuring that evacuation rules are posted in each room and discussed with each class using the room during the first days of the school year. The evacuation rules indicate the primary and alternate exits and the evacuation area to which students should proceed upon leaving the building.

The Building Principal shall conduct evacuation drills according to School Board policy 4:170, *Safety*, and administrative procedure 4:170-AP1, *Comprehensive Safety and Security Plan*.

LEGAL REF: 29 C.F.R. §1910.1030, Occupational Exposure to Bloodborne Pathogens, adopted by the Ill. Department of Labor at 56 Ill.Admin.Code §350.300.  
29 C.F.R. §1910.1200, Occupational Safety and Health Administration Hazard Communication Standards, adopted by 820 ILCS 255/1.5, Toxic Substances Disclosure to Employees Act.  
105 ILCS 5/10-20.17a, ~~Hazardous Materials Training; 5 and 5/10-20.4946; Compliance with Chemical Safety Acts; 49;~~  
[105 ILCS 135/](#), Toxic Art Supplies in School Act, ~~and~~  
[105 ILCS 140/](#), Green Cleaning School Act.  
225 ILCS 235/, Structural Pest Control Act.  
415 ILCS 65/, Lawn Care Products Application and Notice Act.  
23 Ill.Admin.Code §1.330, ~~Toxic Materials Training.~~

Commented [DJ1]: This section was renumbered.

## Operational Services

### Exhibit - Letter to Parents/Guardians Regarding Student Safety <sup>1</sup>

*On District letterhead*

Date

Re: Student Safety

Dear Parent(s)/Guardian(s):

Student safety is our District's top priority. Our District has developed a *Comprehensive Safety and Security Plan*. In addition to physical safety, the District is concerned with students' emotional well-being and will help students cope with an emergency or disaster and its aftermath. The following outlines our emergency and disaster response plans.

#### School Emergency Operations and Crisis Response Plan (SEOCR)

The District has plans for all four phases of emergency and disaster management:

1. Prevention - the capabilities needed to avoid, deter, or stop an incident.
2. Preparation - the capabilities needed to: (a) protect students, teachers, staff, visitors, networks, and property against threats or hazards, and (b) mitigate the likelihood of an incident or to reduce the impact of one.
3. Response - the capabilities needed to stabilize an incident, save lives, establish a safe and secure environment, and facilitate the transition to recovery.
4. Recovery - the capabilities needed to restore the learning environment.

These phases are covered in each ~~school Emergency Operations Plan~~ SEOCR. In addition, the District has a District Safety Coordinator and each school has a Safety Team. State law requires the District to annually review its plans.

#### Communications to Stakeholders

The District will share emergency information via its website, information hotline, the media, and/or telephone contact.

#### Emergency Responses

Emergency responses will depend on the circumstances and may include lockdown or evacuation. During a lockdown, no one may enter or leave the building until it is safe to do so. For evacuation purposes, each school has at least one off-campus site where students and staff assemble to be accounted for and temporarily housed.

In the unlikely event an emergency response is needed at your child's school, staff members will be busy supervising students. We will attempt to provide information through the District's information hotline, \_\_\_\_\_, and/or website \_\_\_\_\_.

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The footnotes should be removed before the material is used.

<sup>1</sup> ~~The topic assigned to this code number was changed in May 2014 and placed in 4:175-AP1, E1, Informing Parents/Guardians About Offender Notification Laws.~~

This sample letter contains some issues on which parents/guardians are deeply concerned. The purpose of this sample letter is to trigger ideas for a similar letter designed to meet a specific district's circumstances.

If students are evacuated, students at \_\_\_\_\_ School will go to \_\_\_\_\_ . You may pick up your child at this location after notifying the school official in charge. Additional instructions will be given in the event of an evacuation, including alternative methods to return your child home.

Cooperation and Assistance Request

During any emergency or potential disaster and for the safety of all students and staff, please follow the instructions of the District Safety Coordinator as well as the Building Principal. These instructions will be widely disseminated.

Defamatory or disruptive behavior will only lessen our response effectiveness.

If you have any questions, please feel free to contact the District office or your child's Principal. In the meantime, thank you for your cooperation and support.

Website Address: \_\_\_\_\_

Information Hotline Number: \_\_\_\_\_

Sincerely,

Superintendent

**Operational Services**

**Exhibit - Letter to Parents/Guardians Regarding Educational Programs About the Dangers of Underage Drinking**

*On District letterhead*

Date

Re:      Underage Drinking

Dear Parent(s)/Guardian(s):

A child's well-being in and out of school is important to us. One area of concern for parents/guardians and educators across the country is underage drinking. Alcohol use can cause destructive behavior that has consequences for a child's health, behavior, and school performance regardless of when and where consumption takes place. It can also lead to an increases in risky behavior.

According to the ~~National Institute of Health (NIH)~~ Centers for Disease Control and Prevention (CDC), 1 in 10 teens in high school drinks and drives. Teen drivers are three times more likely than experienced drivers to be in a fatal crash, and drinking any alcohol greatly increases this risk for teens in cases of alcohol-involved drivers, the rate of fatal crashes for drivers between 16 and 20 years old is more than twice that for drivers older than 20. The ~~NIH-CDC~~ and the ~~Centers for Disease Control and Prevention~~ National Institutes of Health indicate that regular alcohol consumption by minors also corresponds to increased rates of suicide, sexual assault, high-risk sex, fighting, crime, and alcohol dependence. No one fully understands the lifetime consequences of alcohol consumption on the developing brain, but studies have shown weakened memory and worsening of school performance due to increased truancy and learning impairments.

It is illegal for any person under 21 years of age to acquire, possess, or consume alcoholic beverages. District policies prohibit alcohol use by students. District policies also prohibit ~~children/students~~ from (a) alcohol use, possession, distribution, purchase, or sale at school or school functions, and (b) attending school or school functions under the influence of alcohol. Below is a listing of some relevant Illinois laws that apply to underage drinking.

Zero Tolerance Driving While Under the Influence (DUI)

Any person under the age of 21 who has consumed alcohol and operated or been in actual physical control of a motor vehicle may be requested to submit to tests to determine alcohol content. If that person refuses the test or has an alcohol concentration greater than .00, his or her driver's license will be suspended for ~~three~~ three months to one year. (625 ILCS 5/11-501.1(c).

Driving while under the influence of alcohol is a Class A misdemeanor punishable by a fine and ~~or~~ jail for up to ~~one year~~ 364 days. By driving a motor vehicle anywhere in Illinois, a person gives *implied consent* to a test to determine the alcoholic/drug content of his/her blood. If a person refuses to submit to the test, his/her license will automatically be suspended. (625 ILCS 5/11-501).

#### Consumption of Alcohol by a Minor

Consumption of alcohol by a minor is a Class ~~C~~A misdemeanor. Minors convicted of alcohol possession in a public space face up to ~~six months~~364 days in jail and a \$~~2,500~~ fine, plus court costs and court-ordered evaluations and counseling. If a person under the age of 21 pleads guilty to, or is found guilty of, consuming alcohol while under the age of 21, he or she will lose his or her driving privileges for at least ~~3~~three months, even if the person was not driving, and even if he or she gets court supervision (a non-conviction sentence). (~~235 ILCS 5/6-20(f)+0-1(e)~~ and 625 ILCS 5/6-206(a)(43).

#### Fake Identification

Conviction for using a fake ID to obtain alcohol is a Class A misdemeanor. Punishment carries a fine of not less than \$500 and requires at least 25 hours of community service. It may also affect driving privileges. If possible, any community service must be performed for an alcohol abuse prevention program. (235 ILCS 5/6-16(a)(i) and 625 ILCS 5/6-206(a).

#### Criminal Liability for Parent(s)/Guardian(s)

Any parent/guardian or other adult who furnishes alcohol to a minor, or who allows his or her residence to be used for the unlawful possession or consumption of alcohol by minors, may be charged with a Class A misdemeanor, punishable by a fine of ~~not less than \$500 and/or~~ jail for up to ~~one year~~364 days. Where a violation directly or indirectly results in great bodily harm or death to any person, the crime is a ~~C~~Class 4 felony, punishable by ~~one~~ to ~~3~~three years in prison and up to a \$25,000 fine. (235 ILCS 5/6-16(a-1).

#### Civil Liability for Parent(s)/Guardian(s)

Any parent/guardian or other adult who provides alcohol (such as at a home party) may be liable in a civil action for monetary damages ~~totaling up to \$100,000~~. The action may be sought by someone who suffers personal injury, loss of support, or property loss through the actions of an intoxicated minor whose intoxication resulted from a parent/guardian or ~~another~~ adult giving the minor alcohol. (235 ILCS 5/6-21).

#### Driving Under the Influence (DUI)

#### Illegal Transportation of Open Liquor

It is unlawful for any person to transport, carry, possess, or have any alcoholic liquor within the passenger area of any motor vehicle except in the original container and with the seal unbroken. (625 ILCS 5/11-502).

In conclusion, our District encourages you to talk with your child and partner with the school community to prevent underage drinking by our students. For more information on underage drinking and how to talk to your child about it, please see the following links:

[pubs.niaaa.nih.gov/publications/MakeADiff\\_HTML/makediff.htm](https://pubs.niaaa.nih.gov/publications/MakeADiff_HTML/makediff.htm)

[www.responsibility.org/prevent-underage-drinking](http://www.responsibility.org/prevent-underage-drinking)[www.centurycouncil.org/underage-drinking/parents](http://www.centurycouncil.org/underage-drinking/parents)

[www.samhsa.gov/underagedrinking/](http://www.samhsa.gov/underagedrinking/)

Sincerely,

Superintendent

4:170-AP2, E2

## Operational Services

### Exhibit - Letter to Parents/Guardians About Disruptive Social Media Apps; Dangers

On District letterhead ~~or via the District's electronic communications management system~~

Date

Re: Disruptive Social Media Apps; Dangers

Dear Parent(s)/Guardian(s):

Staying on top of social media trends is important for parents/guardians. The District wants you to ~~be~~ **aware** ~~know~~ that the following social media apps have the potential to disrupt the school environment by becoming a platform for bullying, unlawful behaviors, and other dangers.

- *Hyperlocal* social media apps, e.g., *YikYak*, present safety and security concerns for our students. Hyperlocal apps use GPS on cell phones to target groups in specific areas.
- *Temporary* social media apps, e.g., *ask.fm*, *Snapchat*, ~~*Burn Note*~~, ~~and~~ *Whisper*, ~~and~~ ~~*Secret*~~, often present a false belief of anonymity. Temporary apps allow people to send messages and images that self-destruct after a set window of time.

Children need to understand that their online choices are important. Content never truly goes away and no one online is anonymous. Law enforcement agencies have the ability to pinpoint users and content creators, and they do investigate crimes involving the Internet and social media app usage.

The District encourages you to review the resources below and talk with your children. Let's partner together to help children understand how their digital footprints affect their and others' futures. As you discuss this topic with your child, please remind him or her how to report his or her concerns:

1. Tell your child to take a screen shot (if possible) or video (when screen shot not possible); of the content and show you or another trusted adult. Always encourage open conversations about what is happening online. When age-appropriate, discuss that possession and forwarding of sexted images violates federal and state child pornography laws.
2. Use the reporting mechanisms within the social media apps.
3. When a situation begins to disrupt your child's education, report it to your child's school.

#### **Resources about Social Media Apps and Protecting Your Child Online**

~~[www.ParentingTodaysKids.com](http://www.ParentingTodaysKids.com), educates parents/guardians to help them close the technology gap that may exist between themselves and their children.~~

~~[www.common sense media.org/](http://www.common sense media.org/); [www.common sense media.org](http://www.common sense media.org), discusses apps, movies, and more! Type in the app you want to learn more about, and this website will summarize it for you.~~

~~[cell-phone-parental-control-software-review.toptenreviews.com/learning-center.html](http://cell-phone-parental-control-software-review.toptenreviews.com/learning-center.html), reviews recent electronic device monitoring software (current as of May 2014).~~

~~[www.consumer.ftc.gov/topics/protecting-kids-online](http://www.consumer.ftc.gov/topics/protecting-kids-online), contains resources for adults seeking to help children make safe and responsible online choices.~~

Sincerely,

Building Principal

DRAFT

## Operational Services

### Exhibit - Letter to Parents/Guardians About Preventing and Reducing Incidences of Sexting

*On District letterhead*

#### Date

Re: Preventing and Reducing Incidences of Sexting

Dear Parent(s)/Guardian(s):

~~Many parents are unfamiliar with s~~Sexting. It is generally defined as sending, sharing, viewing, receiving, or possessing *indecent visual depictions* of oneself or another person using a cell phone. A student will be disciplined for sexting at school.

Discussing sexting and its legal and social consequences with your children may prevent and reduce incidences of it at school and elsewhere. A recent survey revealed that about 20 percent of teen boys and girls have sent sext messages. It can cause enormous emotional pain for the students involved, often with legal implications. The following talking points from the American Academy of Pediatrics may help start the discussion:

- ~~Introduce the issue as soon as a child is old enough to have a cell phone. E~~Talk to your children, even if the issue hasn't directly impacted your school building's community, a Ask "have you heard of sexting?" "Tell me what you think it is." Learn what your child's understanding is and add an age-appropriate explanation. For more information about starting age-appropriate discussions, see *The New Problem of Talking to Kids and Teens About Social Media and Sexting – Tips from the American Academy of Pediatrics* subhead on the American Academy of Pediatrics website at: [www.aap.org/advocacy/releases/june09socialmedia.htm](http://www.aap.org/advocacy/releases/june09socialmedia.htm). [www.aap.org/en-us/about-the-aap/aap-press-room/news-features-and-safety-tips/Pages/Talking-to-Kids-and-Teens-About-Social-Media-and-Sexting.aspx](http://www.aap.org/en-us/about-the-aap/aap-press-room/news-features-and-safety-tips/Pages/Talking-to-Kids-and-Teens-About-Social-Media-and-Sexting.aspx).
- Make sure children of all ages understand that the District's student ~~discipline~~behavior policy prohibits sexting ~~at school~~, and that it is further punishable in Illinois through the Juvenile Court Act and ~~T~~he Criminal Code of 2012.
- Collect cell phones at gatherings of tweens and teens. Experts have noted that peer pressure can play a major role in sexting, with attendance at parties being a major contributing factor.
- Monitor the media for stories about sexting that illustrate the consequences for both senders and receivers of these images. Ask "Have you seen this story?" "What did you think about it?" "What would you do if you were this child?"
- Rehearse ways your child can respond if asked to participate in sexting.

For more information on sexting, ~~and~~ how to talk to your children about it, and how to say no to sexting, please see the following links:

- [www.common sense media.org/blog/talking-about-sexting](http://www.common sense media.org/blog/talking-about-sexting)
- [www.education.com/magazine/article/child-sexting-parents/;](http://www.education.com/magazine/article/child-sexting-parents/)
- [www.athinline.org/facts/sexting](http://www.athinline.org/facts/sexting)
- <https://planetnutshell.com/portfolio/say-no-to-sexting-grades-7-12/>
- <https://medicalxpress.com/news/2017-12-teen-girls-bombarded-sexting.html>

Sincerely,

Superintendent

DRAFT

## Operational Services

### Administrative Procedure - Plan for Responding to a Medical Emergency at a Physical Fitness Facility with an AED

The following operations implement School Board policy 4:170, *Safety*, requiring a plan for responding to medical emergencies at a physical fitness facility. These operations shall be completed consistent with the Physical Fitness Facility Medical Emergency Procedures Act, 210 ILCS 74/, and the Illinois Department of Public Health (IDPH) Rules, [Title 77](#), Part 527, Physical Fitness Medical Emergency Preparedness Code. Any definitions of terms found in this Act and IDPH implementing rules are used as the definitions of those terms in this procedure. 77 Ill.Admin.Code Part 527.

Actor	Action						
<p>Superintendent or designee</p>	<p>Appoints a staff member to coordinate the operations in this Procedure who will be known as the <i>Plan Coordinator</i>. <sup>1</sup></p> <p>Plan Coordinator:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-bottom: 1px solid black;">Name</td> <td style="width: 50%; border-bottom: 1px solid black;">Position</td> </tr> </table> <p>Files this plan with the <del>Dept. of Public Health</del> IDPH, Division of EMS &amp; Highway Safety, 500 E. Monroe - 8<sup>th</sup> Floor, Springfield, IL 62701. Files an updated plan with the IDPH after a change in the facility that affects the ability to comply with a medical emergency, such as the facility was closed for more than 45 days. 77 Ill.Admin.Code §527.400(a) and &amp;(c).</p> <p>Dates plan submitted:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-bottom: 1px solid black;"></td> <td style="width: 50%; border-bottom: 1px solid black;"></td> </tr> <tr> <td style="width: 50%; border-bottom: 1px solid black;"></td> <td style="width: 50%; border-bottom: 1px solid black;"></td> </tr> </table> <p>Decides, with input from the Plan Coordinator, the schedule for purchasing <del>and maintenance of new</del> AEDs. <a href="#">See 210 ILCS 74/50 withfor compliance date schedule(s)</a>.</p> <p style="padding-left: 40px;">If the AED becomes inoperable, the district must replace or repair it within <del>3</del>10 days. Persons using the facility must be notified if an operable AED is not on the premises. <a href="#">The AED shall be mobile and accessible at all times when the AED is operable.</a> 77 Ill.Admin.Code §527.600.</p> <p>Designates each Building Principal as the individual who must be notified in the event of a medical emergency. <sup>2</sup> 77 Ill.Admin.Code §527.400(a).</p>	Name	Position				
Name	Position						

**The footnotes should be removed before the material is used.**

<sup>1</sup> According to sample procedure 4:170-AP1, *Comprehensive Safety and Security Plan*, the Superintendent appoints a *District Safety Coordinator*. If a district uses 4:170-AP1, consider giving that person the responsibilities of the *Plan Coordinator* and substituting *District Safety Coordinator* for *Plan Coordinator* throughout this procedure.

<sup>2</sup> The IDPH Rules only require that an *office contact* for a specific facility be designated to receive notification of a medical emergency; the Rules do not assign any responsibilities to this individual. Someone other than the building principal could be named.

Actor	Action																	
	Building _____ _____ _____	Office Contact _____ _____ _____																
Plan Coordinator	<p data-bbox="565 443 1419 667">Follows the requirements of 77 Ill.Admin.Code §525.500 upon receiving a completed report that an AED was used. <a href="#">Cooperates to provide information that may be necessary for non-transport vehicle (defined at 77 Ill.Admin.Code §515.825) in compliance with 77 Ill.Admin.Code §515.350 (requires documentation of all medical care provided and a report to the EMS System within 24 hours for the EMS System to review) and provides information to IDPH upon request.</a></p> <p data-bbox="565 684 1192 716"><b>Responsibilities Concerning Emergency Responders</b></p> <p data-bbox="565 726 1414 821">With the Building Principal, identifies all staff members who, through their education or training, are appropriate emergency responders for specific facilities. If possible, train all emergency responders in CPR and AED use.</p> <table data-bbox="565 831 1390 978"> <thead> <tr> <th data-bbox="565 831 1019 863">Facility</th> <th data-bbox="1019 831 1390 863">Emergency Response Providers</th> </tr> </thead> <tbody> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> </tbody> </table> <p data-bbox="565 989 1040 1020"><b>Responsibilities Concerning AED Users</b></p> <p data-bbox="565 1031 1430 1220">Determines the appropriate number of trained AED users and anticipated rescuers or users needed for each facility equipped with an AED. Each facility with an AED must have at least one trained AED user on staff during staffed business hours (210 ILCS 74/15 and 77 Ill.Admin.Code §527.600) and take reasonable measures to ensure that anticipated rescuers or users are trained pursuant to 410 ILCS 4/15 and 77 Ill.Admin.Code §527.800.</p> <p data-bbox="565 1230 1382 1325">Working with the Building Principal, identifies trained AED users and requests that other appropriate staff members and anticipated rescuers or users become trained.</p> <table data-bbox="565 1335 1390 1482"> <thead> <tr> <th data-bbox="565 1335 1019 1367">Facility</th> <th data-bbox="1019 1335 1390 1367">Trained AED Users</th> </tr> </thead> <tbody> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> </tbody> </table> <p data-bbox="565 1493 1122 1524"><b>Responsibilities Concerning AED Registration</b></p> <p data-bbox="565 1535 1414 1598">Coordinates with local emergency medical services systems. 77 Ill.Admin.Code §527.500.</p> <p data-bbox="565 1608 1430 1703">Notifies an agent of the local emergency communications or vehicle dispatch center of the existence, location, and type of the automated external defibrillator. (410 ILCS 4/20(b) <del>and</del>; 77 Ill.Admin.Code §527.500).</p> <p data-bbox="565 1713 1422 1797">Cooperates and provides any information requested by the local emergency communications or vehicle dispatch, so they can complete the Data Collection and Submission report about the use of the AED (77 Ill.Admin.Code</p>		Facility	Emergency Response Providers	_____	_____	_____	_____	_____	_____	Facility	Trained AED Users	_____	_____	_____	_____	_____	_____
Facility	Emergency Response Providers																	
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Facility	Trained AED Users																	
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Actor	Action						
	<p>§515.350). 77 Ill.Admin.Code §525.500.</p> <p><b>Responsibilities Concerning Location of AED and Other First Aid Equipment</b></p> <p><b>Indoor Facility</b> - Decides, with input from the Building Principal or designee, where to place the AED and other first aid equipment so that their location will be conspicuous, easily accessible, and convenient; the AED must be mobile and accessible at all times.- 77 Ill.Admin.Code §527.600.</p> <p><b>Outdoor Facility</b> - Ensures that the AED is placed within 300 feet of the outdoor facility in an open building with unimpeded access that has marked directions to the location of the AED at its entrances. <a href="#">210 ILCS 74/15 and 77 Ill.Admin.Code §527.600(c).</a> <sup>3</sup></p> <table border="0" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center; border-bottom: 1px solid black;">Facility</td> <td style="width: 50%; text-align: center; border-bottom: 1px solid black;">First Aid &amp; AED Location</td> </tr> <tr> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> </tr> </table> <p>Keeps a copy of the AED’s manual with the AED. 77 Ill.Admin.Code §527.700(b).</p> <p><b>Responsibilities Concerning Notification and Posting</b></p> <p>Along with the Building Principal, notifies all staff members of the location of any AEDs as well as the instructions for responding to medical emergencies. 77 Ill.Admin.Code §527.800(b).</p> <p><b>Responsibilities Concerning Training</b></p> <p>Coordinates, with input from the Building Principal, the training of: (1) all staff members who regularly supervise students in physical fitness facilities in the use of CPR and, if appropriate, AEDs, and (2) any non-employee coaches, instructors or other similarly situated anticipated rescuers or users. 77 Ill.Admin.Code §527.800 and 210 ILCS 74/15(b-5) and (b-10).</p> <p><b>Responsibilities Concerning Instructions for Responding to Medical Emergencies</b></p> <p>Along with the Building Principal, notifies all facility staff of the location of any AEDs and the <i>Step-by-Step Emergency Response Plan</i> described below. 77 Ill.Admin.Code §527.800(b).</p> <p>Coordinates, along with the Building Principal, the posting of the <i>Step-by-Step Emergency Response Plan</i> described below. 77 Ill.Admin.Code §527.800(b).</p> <p><b>Responsibilities Concerning Maintenance and Testing of AEDs</b></p> <p>Ensures that all AEDs are maintained and tested according to manufacturer’s guidelines. 77 Ill.Admin.Code §527.700(a).</p>	Facility	First Aid & AED Location				
Facility	First Aid & AED Location						

The footnotes should be removed before the material is used.

~~[3 210 ILCS 74/15, AED legislation and rules have been amended several times in as many years. Rule-making by administrative agencies always lags behind legislation.](#)~~

Actor	Action
	Keeps a copy of the maintenance and testing manual at the facility and keeps a copy of the manual with each AED. 77 Ill.Admin.Code §527.700(b).
Building Principal	In a conspicuous place in the physical fitness facility, posts: (1) the list of all staff members who are emergency responders, and (2) the <i>Step-by-Step Emergency Response Plan</i> described below. 77 Ill.Admin.Code §527.400(a). Posts a notice at the facility’s main entrance stating that an AED is located on the premises. Receives notice in the event of a medical emergency. 77 Ill.Admin.Code §527.400(a).
School Nurse(s)	Along with the Plan Coordinator, helps staff members understand the instructions for responding to medical emergencies.  These instructions must provide that the AED should be operated only by trained AED users, unless the circumstances do not allow time to be spent waiting for a trained AED user to arrive. 77 Ill.Admin.Code §527.800(c).
Trained AED User(s) and/or Other Emergency Responder(s)	According to their training, uses appropriate emergency responses upon the occurrence of any sudden, serious, and unexpected sickness or injury that would lead a reasonable person, possessing an average knowledge of medicine and health, to believe that the sick or injured person required urgent or unscheduled medical care. 77 Ill.Admin.Code §527.400(a). According to their training, uses the AED to help restore a normal heart rhythm. 77 Ill.Admin.Code §527.400(a). Calls <del>9-1-1</del> 911 for medical emergencies and whenever an AED is used. 77 Ill.Admin.Code §527.400(b). Informs the Building Principal whenever the AED or other emergency response is used. 77 Ill.Admin.Code §527.400(b). Whenever an AED is used, cooperates and provides any information requested by the local emergency communications or vehicle dispatch, so they can complete a Data Collection and Submission report about the use of the AED (77 Ill.Admin.Code §515.350). 77 Ill.Admin.Code §525.500.
All Facility Staff Members and Users	Follow the <i>Step-by-Step Emergency Response Plan</i> described below: 1. Immediately notify the building’s emergency responder(s) whose contact information is posted in the facility. Under life and death circumstances call <del>9-1-1</del> 911 without delay. 2. Bring the first aid equipment and AED to the emergency scene. The AED should be operated only by trained AED users for the intended purpose of the AED, unless the circumstances do not allow time for a trained AED user to arrive. 3. Immediately inform the Building Principal or designee of the emergency. 4. The emergency responder will take charge of the emergency. This person will apply first aid, CPR, and/or the AED, as appropriate. 5. If necessary, the emergency responder instructs someone to call <del>9-1-1</del> 911, providing the location in the building and which entrance to use. This person should make sure someone is sent to open the door for

Actor	Action
	<p>paramedics and guide them to the scene.</p> <ol style="list-style-type: none"> <li data-bbox="555 310 1445 405">6. When paramedics arrive and assume care of the victim, the emergency responder or other staff person notifies the victim's parent/guardian or relative.</li> <li data-bbox="555 405 1445 569">7. If an AED was used, the person using it cooperates and provides any information requested by the local emergency communications or vehicle dispatch, so they can complete the Data Collection and Submission report about the use of the AED. If appropriate, a supervising staff member completes an accident report.</li> <li data-bbox="555 569 1445 674">8. If an adult refuses treatment, the emergency responder documents the refusal and, if possible, asks the adult to sign a statement stating that he or she refused treatment.</li> </ol>

DRAFT

## **Operational Services**

### **Exhibit - Notification to Staff and Parents/Guardians of CPR and AED Video**

*On District letterhead, website, in student handbook, newsletters, bulletins, and/or calendars*

Date:

To: Parent(s)/Guardian(s) and Staff

Re: CPR and AED Video

State law requires the [Illinois III](#). High School Association to post a hands-only cardiopulmonary resuscitation (CPR) and automated external defibrillators (AED) training video on its website. The law also requires the District to notify staff members and parents/guardians about the video. You are encouraged to view the video, which will take less than 15 minutes of your time, at:

[www.ihsa.org/Resources/SportsMedicine/CPRTraining.aspx](http://www.ihsa.org/Resources/SportsMedicine/CPRTraining.aspx).

## Operational Services

### Administrative Procedure - Targeted School Violence Prevention Program

Threat assessment procedures work best when incorporated into an overall Targeted School Violence Prevention Program. The procedures are designed to help school officials identify, assess, and manage threats to school safety. The Targeted School Violence Prevention Program is a comprehensive, multi-tiered procedure that includes a threat assessment procedure that contains four sections as follows:

1. Glossary of Terms
2. Targeted School Violence Plan
3. Preparedness for a Targeted School Violence Crisis, Response, and Recovery
4. Threat Assessment (Three Phases):
  - Phase One: Identification
  - Phase Two: Investigation
  - Phase Three: Response

#### Glossary of Terms

**Threat** - An expression of intent to harm someone that may be spoken, written, or communicated in some other way.

**Targeted School Violence** - Includes school shootings and other school-based attacks where the school was deliberately selected as the location for the attack and was not simply a random site of opportunity.

**Targeted School Violence Prevention Program (Program)** - The overall process used to create a District and school environment that is conducive to learning by identifying, managing, and preventing threats and acts of Targeted School Violence.

**Targeted School Violence Prevention Plan (TSVP Plan)** - The strategic procedures used to integrate a Targeted School Violence Prevention Program into a District's existing policies and procedures.

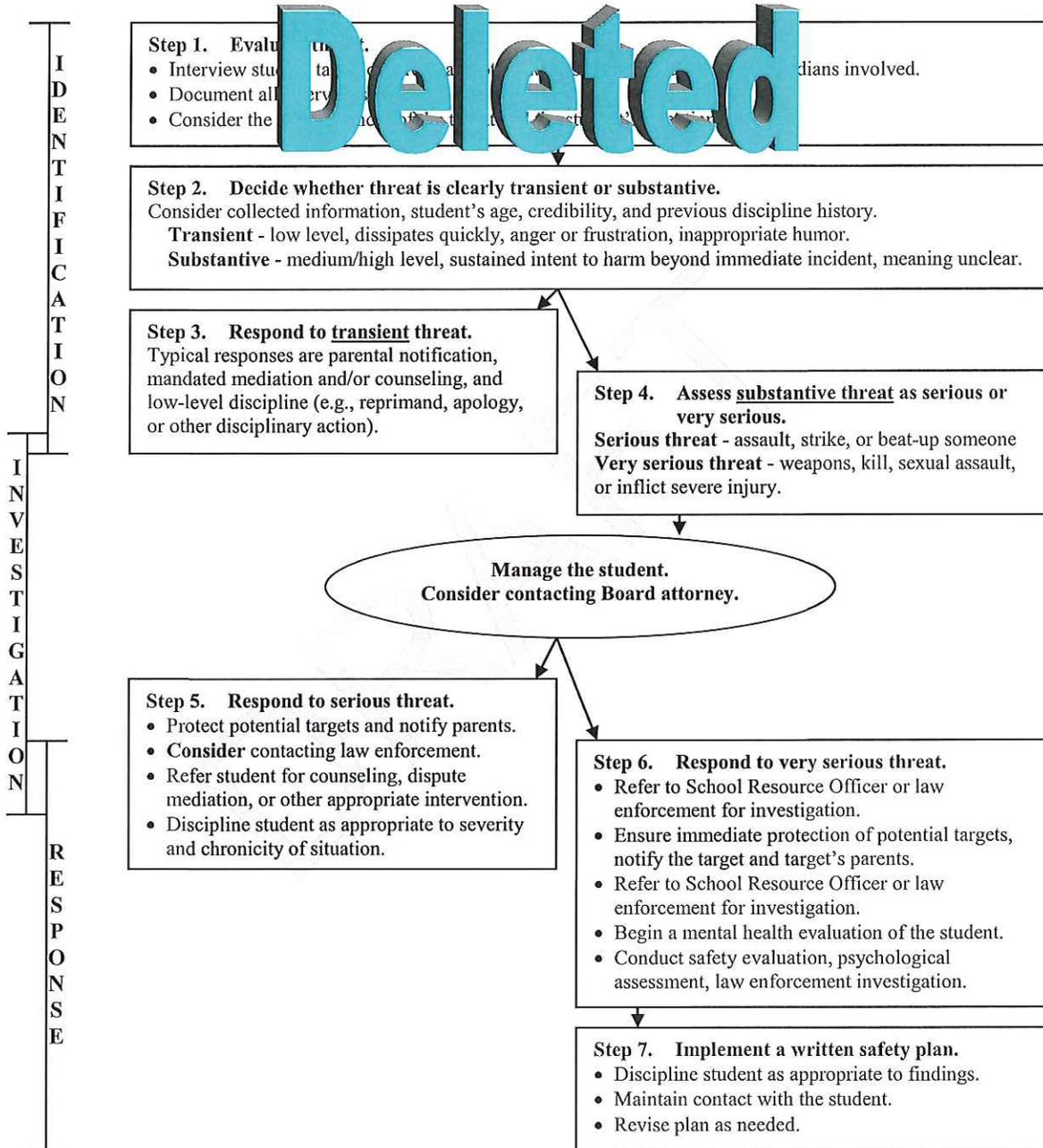
**The footnotes should be removed before the material is used.**

<sup>1</sup> Hanks, J. (2004). School Violence: From Discipline to Due Process. *Section of State and Local Government Law, American Bar Association*, p. 145, citing *U.S. Secret Service & U.S. Department of Education, Threat Assessment In School: A Guide to Managing Threatening Situations and To Creating Safe School Climates* (Washington, D.C., May 2002), p. 5-6. Several resources to assist with the collective implementation of a targeted school violence prevention program are available. They include but are not limited to:

1. *School Violence: Prevention*, developed by the Centers for Disease Control (CDC). Its materials state that “[n]o one factor in isolation causes school violence, so stopping school violence involves using multiple prevention strategies that address the many individual, relationship, community, and societal factors that influence the likelihood of violence. Prevention efforts should ultimately reduce risk factors and promote protective factors at these multiple levels of influence.” See [www.cdc.gov/violenceprevention/youthviolence/schoolviolence/prevention.html](http://www.cdc.gov/violenceprevention/youthviolence/schoolviolence/prevention.html).
2. *Youth and School Violence Prevention*, developed by the Safe Schools/Healthy Students (SS/HS) Initiative, created through collaboration between the U.S. Depts. of Health and Human Services, Education, and Justice. See [www.sshs.samhsa.gov/initiative/about.aspx](http://www.sshs.samhsa.gov/initiative/about.aspx).
3. *School Connectedness: Strategies for Increasing Protective Factors Among Youth*, developed by the CDC. See [www.cdc.gov/healthyyouth/protective/pdf/connectedness.pdf](http://www.cdc.gov/healthyyouth/protective/pdf/connectedness.pdf) and [www.cdc.gov/healthyyouth/protective/connectedness.htm](http://www.cdc.gov/healthyyouth/protective/connectedness.htm).

## Operational Services

### Exhibit - Threat Assessment Decision Tree 1



1 Adapted from Cornell, D., Sheras, P., (Sopris West 2006). *Guidelines for Responding to Student Threats of Violence*, p. 16.

### Operational Services

#### Exhibit - Threat Assessment Documentation and Response

Below is a sample threat assessment documentation and response form. Each section contains investigation questions designed to gather information to evaluate, manage and prevent threats. Assessment teams should modify the questions and form to fit their school policy, 7:340, Student Records, for appropriate recordkeeping procedures or placement of this information in the student's temporary record. Adapted from Cornell, D., Sheras, P., (Sopris West 2006). Guidelines for Responding to Student Threats of Violence, p. 110.



Your name	Title
Student who made threat	School
Date learned of threat	Date threat occurred
Threat reported by (or circle anonymous)	Location of threat

**Threat type:**     Transient         Serious Substantive         Very Serious Substantive

What student said or did to express a threat (quote student if possible, write exact content of threat):

#### Interview Guidelines

##### **Interview of Student who made threat**

*Use interview for investigation; modify and use additional pages as needed and attach to this form.*

1. Do you know why I wanted to talk with you? Tell me.
2. What happened today when you were (refer to place of incident)?
3. What exactly did you say? And what exactly did you do? (write down student's exact words)
4. What did you mean when you said/did that? (ascertain the student's motives/goals)

## Operational Services

### Exhibit - Targeted School Violence Prevention and Threat Assessment Education

On District Letterhead

Date:

To: District Staff and Parents

From: Building Principal

Re: Targeted School Violence Prevention Program

Student safety is our District's top priority. To maximize safety, the District must have a process to identify *threats* and prevent *targeted school violence*. This process is part of the Targeted School Violence Prevention Program (Program). The Program is a portion of the preparedness and response phases of the District's Safety Plan for emergency operations plans and disaster management.

The District wishes to create a climate that encourages sharing *any* information about a safety concern with a trusted adult who can help. Sharing information about threats and safety concerns is everyone's responsibility: students, parents, staff, and community members. The question and answer section below is designed to help students, staff and parents understand when school officials want individuals to share information about a safety concern with the Building Principal.

#### What Is a Threat?

A threat expresses intent to harm someone or something. It may be spoken, written, or expressed in another way. Threats may be direct ("I'm going to beat you up" or "I'm going to blow this place up!") or indirect ("Come and watch what I am going to do to him/her."). A threat can be vague ("I'm going to hurt him.") or implied ("You better watch out."). Any possession of a weapon or mention of one is a possible threat. Sometimes students make threats that may seem funny or "just kidding," but sometimes a threat is very serious and/or criminal. When you are in doubt as to whether the statement is kidding or serious, the responsible thing to do is to tell a trusted adult who can help.

#### What Is Targeted School Violence?

Targeted School Violence includes school shootings and other school-based attacks where the school was deliberately selected as the location for the attack and was not simply a random site of opportunity.

#### What Is the Connection Between Targeted School Violence and Bullying?

The Ill. State Board of Education's School Bullying Prevention Taskforce report identifies bullying and targeted school violence as "part and parcel of the same issue: *interpersonal aggression*." In all its forms, interpersonal aggression negatively impacts students, school personnel, and communities and should be reported, investigated, and responded to with appropriate interventions.

#### What Can Staff and Parents Do?

Educate students about what a threat is, encourage students not to make threats or "just kidding" statements in the first place, and reiterate that seeking help to prevent someone from getting hurt or hurting another is appropriate. See 7:180 AP1, E2, *Be a Hero by Reporting Bullying and School Violence*.

**Operational Services**

**Administrative Procedure - Movable Soccer Goal Safety 1**

Actor	Action
Superintendent	Requires all Building Principals to: <ol style="list-style-type: none"> <li>1. Identify any movable soccer goal that <a href="#">the District owns or controls and</a> is on school grounds; and</li> <li>2. Ensure that supervisors comply with the Movable Soccer Goal Safety Act <a href="#">a/k/a Zach's Law</a>. (430 ILCS 145/).</li> </ol>
Building Principal	Reviews the Ill. Department of Public Health's assistance materials found at <a href="http://www.idph.state.il.us/soccer_goal_safety/index.htm">www.idph.state.il.us/soccer_goal_safety/index.htm</a> . Identifies any movable soccer goals on school grounds, or that the school owns or controls. Implements the Movable Soccer Goal Safety Act (430 ILCS 145/) by, among other things, instructing staff members to properly secure or anchor a movable soccer goal when installing, setting up, maintaining, or moving one.

The footnotes should be removed before the material is used.

<sup>1</sup> This procedure is needed only by a school district that owns or controls a movable soccer goal. The Movable Soccer Goal Safety Act [a/k/a Zach's Law](#), 430 ILCS 145/420 ILCS 145/. ~~Added by P.A. 97-234,~~ This law requires organizations that own or control a movable soccer goal to create a soccer goal safety and education policy that outlines how the organization will specifically address the safety issues associated with movable soccer goals. See f/n [138](#) of policy 4:170, *Safety*.

## Operational Services

### Exhibit - Informing Parents/Guardians About Offender Community Notification Laws

*On District letterhead, website, and/or in student handbook*

Date:

To: Parent(s)/Guardian(s)

Re: Offender Community Notification Laws

State law requires schools to notify parent(s)/guardian(s) during school registration or parent-teacher conferences that information about sex offenders and violent offenders against youth is available to the public on the Illinois [Dept. of State Police's \(ISP\)](#) website. The ~~ISP~~ Illinois State Police website contains the following:

Illinois Sex Offender Registry, [www.isp.state.il.us/sor/](http://www.isp.state.il.us/sor/)

Illinois Murderer and Violent Offender Against Youth Registry, [www.isp.state.il.us/cmvo/](http://www.isp.state.il.us/cmvo/)

Frequently Asked Questions Concerning Sex Offenders, [www.isp.state.il.us/sor/faq.cfm](http://www.isp.state.il.us/sor/faq.cfm)

## Operational Services

### Targeted School Violence Prevention Program <sup>1</sup>

Threats and acts of targeted school violence harm the District's environment and school community, diminishing students' ability to learn and a school's ability to educate. Providing students and staff with access to a safe and secure District environment is an important Board goal. While it is not possible for the District to completely eliminate threats in its environment, a Targeted School Violence Prevention Program (Program) using the collective efforts of local school officials, staff, students, families, and the community helps the District reduce these risks to its environment.

The Superintendent or designee shall develop and implement the Program.<sup>2</sup> The Program oversees the maintenance of a District environment that is conducive to learning and working by identifying, assessing, classifying, responding to, and managing threats and acts of targeted school violence. The Program shall be part of the District's Comprehensive Safety and Security Plan, required by Board policy 4:170, *Safety*, and shall:

1. Establish a District-level School Violence Prevention Team to: (a) develop a District-level Targeted School Violence Prevention Plan, and (b) oversee the District's Building-level Threat Assessment Team(s). <sup>3</sup>

**The footnotes are not intended to be part of the adopted policy; they should be removed before the policy is adopted.**

<sup>1</sup> This policy is optional. It contains items from *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Second Edition (August 2016), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: [www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf](http://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf). *Threat Assessment in Virginia Public Schools* is based upon a synthesis of established research and recognized standards of practice regarding threat assessment and management in school and workplace settings, including *Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates*, a 2002 publication of the U.S. Secret Service and the U.S. Dept. of Education, at: [www.secretservice.gov/data/protection/ntac/ssi\\_guide.pdf](http://www.secretservice.gov/data/protection/ntac/ssi_guide.pdf). The July 2018 update of this document was renamed *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*, published by the U.S. Secret Service, at: [www.dhs.gov/sites/default/files/publications/18\\_0711\\_USSS\\_NTAC-Enhancing-School-Safety-Guide.pdf](http://www.dhs.gov/sites/default/files/publications/18_0711_USSS_NTAC-Enhancing-School-Safety-Guide.pdf).

Boards are authorized to adopt a policy on targeted school violence prevention programs even though State and federal law provide little guidance. State law grants boards broad authority to formulate, adopt, and modify school board policies, at the board's sole discretion, subject only to mandatory collective bargaining agreements and State and federal law. 105 ILCS 5/10-20.5 and 115 ILCS 5/1 et seq. See policies 2:20, *Powers and Duties of the School Board; Indemnification*, and 2:240, *Board Policy Development*.

Adopting a policy that addresses targeted school violence prevention provides (a) a way for boards to monitor that it is being done, and (b) an opportunity for each board and the superintendent to examine all current policies, collective bargaining agreements, and administrative procedures on this subject. Before adoption of this policy, each board may want to have a conversation with the superintendent to determine whether local conditions and resources and current practices will support full implementation of this policy and its accompanying administrative procedures. Its goals and program will be most effective when they reflect local conditions and circumstances.

<sup>2</sup> Ensuring school safety begins with establishing a comprehensive targeted school violence prevention program, which "includes forming a multidisciplinary threat assessment team, establishing central reporting mechanisms, identifying behaviors of concern, defining the threshold for law enforcement intervention, identifying risk management strategies, promoting safe school climates, and providing training to stakeholders." *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*, published by the U.S. Secret Service, at: [www.dhs.gov/sites/default/files/publications/18\\_0711\\_USSS\\_NTAC-Enhancing-School-Safety-Guide.pdf](http://www.dhs.gov/sites/default/files/publications/18_0711_USSS_NTAC-Enhancing-School-Safety-Guide.pdf).

<sup>3</sup> The establishment of threat assessment teams in K-12 public schools is Recommendation #1 of the *Recommendations of the Illinois Terrorism Task Force School Safety Working Group*, presented to the Office of the Governor on 4-5-18, at: [www.iasb.com/safety/](http://www.iasb.com/safety/). Illinois higher education institutions have required threat assessment teams since the passage of the Campus Security Enhancement Act of 2008 (110 ILCS 12/20(b)(2), eff. 1-1-09) in response to the shootings that took place at Virginia Polytechnic Institute and State University on 4-16-07 and Northern Illinois University on 2-14-08.

2. Establish Building-level Threat Assessment Team(s) to assess and intervene with individuals whose behavior may pose a threat to safety. This team may serve one or more schools.
3. Comply with State and federal law and align with Board policies.

The Local Governmental and Governmental Employees Tort Immunity Act protects the District from liability. The Program does not: (1) replace the care of a physician licensed to practice medicine in all of its branches or a licensed medical practitioner or professional trained in violence prevention, assessments and counseling services, (2) extend beyond available resources within the District, (3) extend beyond the school day and/or school-sponsored events, or (4) guarantee or ensure the safety of students, District staff, or visitors. 4

LEGAL REF.: 105 ILCS 5/10-20.14, 5/10-21.7, 5/10-27.1A, 5/10-27.1B, 5/24-24, and 5/27-23.7.  
105 ILCS 128/, School Safety Drill Act.  
745 ILCS 10/, Local Governmental and Governmental Employees Tort Immunity Act.  
29 Ill.Admin.Code Part 1500.

CROSS REF.: 2:240 (Board Policy Development), 4:170 (Safety), 5:90 (Abused and Neglected Child Reporting), 5:100 (Staff Development Program), 5:230 (Maintaining Student Discipline), 6:65 (Student Social and Emotional Development), 7:140 (Search and Seizure), 6:270 (Guidance and Counseling Program), 7:150 (Agency and Police Interviews), 7:180 (Prevention of and Response to Bullying, Intimidation, and Harassment), 7:185 (Teen Dating Violence Prohibited), 7:190 (Student Behavior), 7:250 (Student Support Services), 7:290 (Suicide and Depression Awareness and Prevention), 7:340 (Student Records), 8:30 (Visitors to and Conduct on School Property), 8:100 (Relations with Other Organizations and Agencies)

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**The footnotes are not intended to be part of the adopted policy; they should be removed before the policy is adopted.**

**4 Consult the board attorney for guidance concerning liability in this area.** Except for cases of willful and wanton conduct, the Local Governmental and Governmental Employees Tort Immunity Act (TIA) likely protects districts from liability for failure to properly identify and/or respond to a student's behavior that results in injury or suicide. See 745 ILCS 10/3-108 and Grant v. Board of Trustees of Valley View School Dist. No. 365-U, 286 Ill.App.3d 642 (3rd Dist. 1997). Every situation is fact specific, and the issues require careful evaluation. A disclaimer, such as the one presented here, may not be sufficient. A district may take several actions, after discussion with its board attorney, to minimize liability, such as adding limiting phrases and ensuring other policies are followed.

In addition to the TIA, school officials and districts may also be entitled to qualified immunity in civil rights lawsuits that seek to hold them liable for a suicide. For further discussion, see f/n 13 in policy 7:290, *Suicide and Depression Awareness and Prevention*.

## Operational Services

### Administrative Procedure - Targeted School Violence Prevention Program

Use this procedure to establish a Targeted School Violence Prevention Program (Program). It defines terms important to the Program, outlines actions for specific staff members to execute, and is adapted from the premier best practice model as of this publication: *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Second Edition (2016), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: [www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf](http://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf).

This administrative procedure contains three sections as follows:

1. Glossary of Terms
2. Establishment and Function of Targeted School Violence Prevention Plan
3. Preparedness for a Targeted School Violence Crisis, Response, and Recovery

#### Glossary of Terms

**Aberrant Behavior** – Behavior that is atypical for the person or situation and causes concern for the safety or well-being of those involved. Aberrant behavior involves actions, statements, communications, or responses that are unusual for the person or situation; actions that could lead to violence toward self or others; or actions that are reasonably perceived as threatening or causing concern for the well-being of the person. These can include (but are not limited to):

- Unusual social distancing or isolation of subjects from peers and family members;
- Sullen or depressed behavior from a usually friendly and positive person;
- Out-of-context outbursts of verbal or physical aggression;
- Increased levels of agitation, frustration, and anger;
- Confrontational, accusatory, or blaming behavior;
- An unusual interest in or fascination with weapons; and/or
- Fixation on violence as a means of addressing a grievance.

**District Environment** – broadly characterized as the District’s learning and working environment; it includes the physical environment of school buildings and grounds, all services and programs provided by the District, and the overall school climate.

**School Climate** – a part of the District environment, school climate is the quality and character of school life. School climate is based on patterns of students’, parents’, and staff’s experience of school life; it also reflects norms, goals, values, interpersonal relationships, teaching and learning practices, and organizational structures. <sup>1</sup>

**Targeted School Violence** – Includes school shootings and other school-based attacks where a school or a member of the school community was deliberately selected as the target of the attack and was not simply a random target of opportunity.

**Targeted School Violence Prevention Plan (TSVP Plan)** – For purposes of policy 4:190, *Targeted School Violence Prevention Program*, and this procedure, a District-wide plan that is incorporated into each School Emergency Operations and Crisis Response Plan (SEOCR) in 4:170-API,

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The footnotes should be removed before the material is used.

<sup>1</sup> Definition adapted from the National School Climate Center. See [www.schoolclimate.org/about/our-approach/what-is-school-climate](http://www.schoolclimate.org/about/our-approach/what-is-school-climate).

*Comprehensive Safety and Security Plan.* A TSVP Plan is collectively implemented by local school officials, District staff, students, families, and the community with the goal of preventing and identifying threats and targeted school violence. Under a properly implemented TSVP Plan, schools can respond to individuals/situations that raise safety concerns.

**Threat** – A concerning 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 could cause harm to self or others. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means; it is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat or observed by or communicated to a third party, and regardless of whether the target of the threat is aware of the threat. For more information on types of threats, see the subhead entitled **Assessing and Classifying Threats** in 4:190-AP2, *Threat Assessment Team (TAT)*.

**Threat Assessment** – A fact-based process emphasizing an appraisal of observed (or reasonably observable) behaviors to identify potentially dangerous or violent individuals/situations, to assess them, and to manage/address them.

**Threat Assessment Team (TAT)** – A multidisciplinary Building-level team lead by the Building Principal to perform specific threat assessments. For information about the function of TATs and their procedures, see 4:190-AP2, *Threat Assessment Team (TAT)*.

Establishment and Function of Targeted School Violence Prevention Plan

Following are the strategic procedures to integrate a TSVP Plan into the District’s existing policies and procedures.

Actor	Action
Superintendent	<p>Selects School Violence Prevention Team (SVP Team) members from throughout the community to include:</p> <ul style="list-style-type: none"> <li>Building Principals (Building Principals are mandatory for successful implementation of a TSVP Plan).</li> <li>District Safety Coordinator (see 4:170-API, <i>Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities</i>)</li> <li>Teachers</li> <li>Law enforcement representatives</li> <li>Board attorney <sup>2</sup></li> <li>District psychologist(s), social worker(s), and/or counselor(s)</li> <li>Other mental health workers and/or social service agencies</li> <li>Faith leaders</li> <li>Community members</li> <li>Students</li> </ul> <p>Chairs and convenes SVP Team meetings for the purpose of developing a TSVP Plan.</p> <p>Determines whether to recommend that the Board assess the District’s conditions for development and learning (see 7:180-API, <i>Prevention,</i></p>

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<sup>2</sup> Consult the board attorney about creating methods for exchanging information in a manner that complies with applicable State and federal laws. See f/n 4 below.

Actor	Action
	<p><i>Identification, Investigation, and Response to Bullying</i>, for resources and more discussion).</p> <p>Informs the Board of the SVP Team’s progress, needs, and recommendations by adding information items to the Board’s agendas as needed. <sup>3</sup></p>
SVP Team	<p>Meets when called by the Superintendent for the purpose of: (1) developing a TSVP Plan, and (2) creating, implementing, and monitoring TATs.</p> <p>For more information about the function of TATs, see 4:190-AP2, <i>Threat Assessment Team (TAT)</i>. See Recommendation #1 from the <i>Recommendations of the Illinois Terrorism Task Force School Safety Working Group</i>, encouraging districts to establish TATs, at <a href="http://iasb.mys1cloud.com/ITTFSchoolSafetyWorkingGroupRecs.pdf">iasb.mys1cloud.com/ITTFSchoolSafetyWorkingGroupRecs.pdf</a>.</p> <p>Ensures that the District’s TSVP Plan complies with applicable civil rights and other State and federal laws.</p> <p>Ensures that all District staff are annually trained<sup>4</sup> and understand the TSVP Plan, the role of the SVP Team, and the role a TAT.</p> <p>Ensures that procedures are maintained for effective information sharing between the District and local law enforcement agencies and community services agencies, including defining the threshold for law enforcement intervention.</p> <p>Regularly assesses the effectiveness of the TSVP Plan throughout the District, including the establishment of resources for central reporting mechanisms at the District-wide and school-building level.</p> <p>Identifies policies and procedures or equivalent topics that possibly affect a TSVP Plan, including but not limited to:</p> <ul style="list-style-type: none"> <li>1:20, <i>District Organization, Operations, and Cooperative Agreements</i></li> <li>2:150, <i>Committees</i></li> <li>2:240, <i>Board Policy Development</i></li> <li>3:40, <i>Superintendent</i></li> <li>3:60, <i>Administrative Responsibility of the Building Principal</i></li> <li>4:170, <i>Safety</i></li> <li>4:190, <i>Targeted School Violence Prevention Program</i></li> <li>5:100, <i>Staff Development Program</i></li> <li>5:130, <i>Responsibilities Concerning Internal Information</i></li> <li>5:230, <i>Maintaining Student Discipline</i></li> </ul>

The footnotes should be removed before the material is used.

<sup>3</sup> See policy 2:240, *Board Policy Development*. Resources may include providing resources to and access for staff to professional development opportunities. These opportunities should train staff to properly respond to students who provide them with information about a threat or school safety concern. See *Prior Knowledge of Potential School-Based Violence: Information students learn may prevent a targeted attack*, U.S. Secret Service and U.S. Dept. of Education, p. 10, at: [www.secretservice.gov/ntac/bystander\\_study.pdf](http://www.secretservice.gov/ntac/bystander_study.pdf).

<sup>4</sup> Annual training is not required. At the time of this material’s publication, several school violence prevention-related bills were pending before the 101<sup>st</sup> General Assembly that may include an annual training requirement. Amend the training requirement to reflect local conditions and/or the law at the time of implementation.

Actor	Action
	<p>6:65, <i>Student Social and Emotional Development</i>  6:120, <i>Education of Children with Disabilities</i>  6:235, <i>Access to Electronic Networks</i>  7:20, <i>Harassment of Students Prohibited</i>  7:130, <i>Student Rights and Responsibilities</i>  7:140, <i>Search and Seizure</i>  7:150, <i>Agency and Police Interviews</i>  7:170, <i>Vandalism</i>  7:180, <i>Prevention of and Response to Bullying, Intimidation, and Harassment</i>  7:190, <i>Student Behavior</i>  7:200, <i>Suspension Procedures</i>  7:210, <i>Expulsion Procedures</i>  7:230, <i>Misconduct by Students with Disabilities</i>  7:250, <i>Student Support Services</i>  7:340, <i>Student Records 5</i>  8:10, <i>Connection with the Community</i>  8:95, <i>Parental Involvement</i>  8:100, <i>Relations with Other Organizations and Agencies</i></p> <p>Recommends, through the Superintendent, proposed policy changes to the Board for consideration. See Board policy 2:240, <i>Board Policy Development</i>.</p> <p>Recommends and procures resources for stakeholder training.</p>
Building Principal	<p>Ensures 4:170-AP1, <i>Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCR)</i>, is:  Available throughout schools (do <b>not</b> limit to office);  Distributed to and discussed with local law enforcement; and  Regularly reviewed with building staff.</p> <p>Notifies and educates all staff, volunteers, and contractors of their duty to immediately report to the Building Principal or designee any</p>

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<sup>5</sup> Consult the board attorney for guidance about the application of State (Ill. School Student Records Act, 105 ILCS 10/) and federal (Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. §1232g) student privacy laws, a crucial element of implementing a successful TSVP Plan, which relies upon school officials sharing confidential information. **Note:** information kept by law enforcement professionals working in a school is not considered a *school student record*. 105 ILCS 10/2. School officials may also need guidance about the release of confidential information given by a student to a therapist, e.g., school counselor or psychologist, but note that those issues are governed by the Mental Health and Developmental Disabilities Confidentiality Act, 740 ILCS 110/.

The following resource from the State of Ill. Campus Security Task Force Report to the Governor, Appendix C, Part II, pp. 227-233 (2008), at: [www2.illinois.gov/ready/sitecollectiondocuments/cstf\\_report\\_partii.pdf](http://www2.illinois.gov/ready/sitecollectiondocuments/cstf_report_partii.pdf), may be helpful. A multidisciplinary task force comprised of Illinois' top leaders in education, mental health, public safety, and law enforcement created the report in response to the shooting at Northern Ill. University on 2-14-08. While the document addresses many issues pertaining to higher education campus security, it contains helpful information for school officials regarding student privacy and other prevention of targeted school violence management issues.

An additional resource that may be helpful is *School Resource Officers, School Law Enforcement Units, and the Family Educational Rights and Privacy Act (FERPA)*, from the Privacy Technical Assistance Center of the U.S. Department of Education (2019), at <https://studentprivacy.ed.gov/resources/school-resource-officers-school-law-enforcement-units-and-ferpa>. Disclosure of confidential student records to threat assessment team members is address on p. 12-14.

Actor	Action
	<p>expression of intent to harm another person, concerning communication, or concerning behavior that suggests an individual may intend to commit an act of violence.</p> <p>Notifies and educates staff, parent(s)/guardian(s), students, and community members: (1) to report individuals and situations of concern to any school administrators or other authorities, i.e., local law enforcement, and (2) how school officials will address these concerns. Distributes Board policy 4:190, <i>Targeted School Violence Prevention Program</i>; 4:190-AP2, E6, <i>Targeted School Violence and Threat Assessment Education</i>; and 7:180-AP1, E2, <i>Be a Hero by Reporting Bullying</i>; and discusses what TATs are and what they do when they learn of threats and/or school violence. <sup>6</sup></p> <p>Assesses the feasibility of forming an anonymous tip line and organizing its management.</p> <p>When a tip or concern is raised, ensures TATs are trained to engage in their work. See 4:190-AP2, <i>Threat Assessment Team (TAT)</i>.</p>
All District staff, volunteers, and contractors	<p>Read 4:190-AP2, E6, <i>Targeted School Violence and Threat Assessment Education</i>.</p> <p>Immediately report to the Building Principal or designee any expression of intent to harm another person, concerning communication, or concerning behavior that suggests an individual may intend to commit an act of targeted violence.</p> <p>Upon belief that an individual/situation poses a clear and immediate threat of serious violence that requires containment, notify school security and/or law enforcement in accordance with the SEOCR. See 4:170-AP1, <i>Comprehensive Safety and Security Plan</i>.</p>
School Board	<p>Monitors 4:190, <i>Targeted School Violence Prevention Program</i>, and considers adopting changes recommended by the SVP Team. See Board policy 2:240, <i>Board Policy Development</i>.</p> <p>Provides both the SVP Team and TATs with appropriate resources, which may include providing resources and access for staff professional development opportunities. These opportunities should train staff to</p>

The footnotes should be removed before the material is used.

<sup>6</sup> Creating a school climate in which students believe the school staff wants to hear from them about threats is critical to ensuring that students come forward. Encourage students to come forward regardless of the amount of information they have, and convey to students that their reports are taken seriously. Also communicate to students that their reports may stay anonymous. If students do not feel that they will be treated with respect and listened to in a non-judgmental manner, or that the information will not be protected, they will not come forward and the school will lose an opportunity to intervene in a possible attack, as well as to assist a troubled student. See *Prior Knowledge of Potential School-Based Violence: Information students learn may prevent a targeted attack*, U.S. Secret Service and U.S. Dept. of Education (May 2008), at: [rems.ed.gov/docs/DOE\\_BystanderStudy.pdf](https://rems.ed.gov/docs/DOE_BystanderStudy.pdf).

For more school climate discussions, see *Guide for Developing High-Quality School Emergency Operations Plans*, U.S. Depts. of Education, Health and Human Services, Homeland Security, Justice, Federal Bureau of Investigation, and Federal Emergency Management Agency (June 2013): [rems.ed.gov/docs/REMS\\_K-12\\_Guide\\_508.pdf](https://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf); and 7:180-AP1, *Prevention, Identification, Investigation, and Response to Bullying*, 7:180-AP1, E1, *Resource Guide for Bullying Prevention*, 7:180-AP1, E3, *Memo to Staff Regarding Bullying*, and 7:180-AP1, E5, *Report Form for Bullying*.

Actor	Action
	properly respond to individuals who provide them with information about a threat or school safety concern. <sup>7</sup>
Superintendent/Building Principal	Ensures the student behavior policies referred to in student handbooks notify students that threatening behavior could subject a student to disciplinary consequences. See Board policies 7:180, <i>Prevention of and Response to Bullying, Intimidation, and Harassment</i> , and 7:190, <i>Student Behavior</i> .  Ensures that staff responds to students who provide them with information about a threatening or concerning individual/situation.

Preparedness for a Targeted School Violence Crisis, Response, and Recovery

Following is an extension of 4:170-API, *Comprehensive Safety and Security Plan*. It outlines additional tasks for the Superintendent, District Safety Coordinator, and Building Principal(s) preparing for a targeted school violence crisis that school officials can incorporate into trainings related to each existing SEOCR. <sup>7</sup>

Actor	Action
Superintendent, Building Principal, and SVP Team	Examine 4:170-API, <i>Comprehensive Safety and Security Plan</i> , and recommend any changes to existing procedures to the Superintendent or District Safety Coordinator.
District Safety Coordinator	Meets with SVP Team to foster an understanding of what additional items each 4:170-API Safety Team (see 4:170-API, <i>Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities</i> ) might add to its procedures to accomplish a response and recovery.  Adds an agenda item to the 4:170-API Safety Team meetings specific to Targeted School Violence; considers inviting the Board Attorney and local law enforcement and emergency responders to this meeting.  <b>Note:</b> During a crisis, legal counsel will be a crucial part of crisis response and management (but not necessarily public relations and communication) because school officials must make split-second decisions, often with legal consequences to the District. Local law enforcement’s familiarity with the identity of the District’s legal counsel <i>before</i> a crisis occurs will assist with a faster connection between legal counsel and the school officials involved in the early stages of a Targeted School Violence Crisis and the immediate response to it.  Considers designating a trained public relations and communication manager to inform parent(s)/guardian(s) and the community during a crisis and to keep pace with social media information.
Superintendent and Building Principal(s)	For crisis preparedness and response, ensure that:

The footnotes should be removed before the material is used.

<sup>7</sup> See *Prior Knowledge of Potential School-Based Violence: Information students learn may prevent a targeted attack*, p. 10, at: [rems.ed.gov/docs/DOE\\_BystanderStudy.pdf](https://rems.ed.gov/docs/DOE_BystanderStudy.pdf).

Actor	Action
	<p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCR)</i>, reflects each individual building's needs.</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Part F, School Safety Drill Plan</i>, supports a TSVP Plan.</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Parts G and H</i>, reflects each building's needs. Also ensure that multiple copies of these plans exist, and direct that appropriate persons have access to the plans, e.g., local law enforcement authorities, etc. One copy in the Building Principal's office is insufficient.</p> <p>For crisis recovery, ensure that 4:170-AP1, <i>Comprehensive Safety and Security Plan, Parts I, J, and K</i>, reflects District needs and that the Board Attorney is aware of the plans.</p> <p>Recommend to the District Safety Coordinator any other additional crisis recovery items that the 4:170-AP1 Safety Team deems necessary.</p>

DRAFT

## Operational Services

### Exhibit - Targeted School Violence Prevention Program Resources

#### General Resources

- Virginia Center for School and Campus Safety: [www.dcjs.virginia.gov/virginia-center-school-and-campus-safety](http://www.dcjs.virginia.gov/virginia-center-school-and-campus-safety)
- Readiness and Emergency Management for Schools Technical Assistance Center: [rems.ed.gov](http://rems.ed.gov)
- School Violence: Prevention, Centers for Disease Control and Prevention: [www.cdc.gov/violenceprevention/youthviolence/schoolviolence/prevention.html](http://www.cdc.gov/violenceprevention/youthviolence/schoolviolence/prevention.html).
- School Violence Prevention Resources, Substance Abuse and Mental Health Services Administration: [www.samhsa.gov/safe-schools-healthy-students/resources/violence-prevention](http://www.samhsa.gov/safe-schools-healthy-students/resources/violence-prevention)
- Suicide Prevention Resource Center: [www.sprc.org/](http://www.sprc.org/)
- Final Report of the Federal Commission on School Safety*, Federal Commission on School Safety (December 2018): [www2.ed.gov/documents/school-safety/school-safety-report.pdf](http://www2.ed.gov/documents/school-safety/school-safety-report.pdf)
- Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*, U.S. Secret Service (July 2018): [www.secretservice.gov/data/protection/ntac/USSS\\_NTAC\\_Enhancing\\_School\\_Safety\\_Guide\\_7.11.18.pdf](http://www.secretservice.gov/data/protection/ntac/USSS_NTAC_Enhancing_School_Safety_Guide_7.11.18.pdf)
- A Study of the Pre-Attack Behaviors of Active Shooters in the United States Between 2000 and 2013*, Federal Bureau of Investigation (June 2018): [www.fbi.gov/file-repository/pre-attack-behaviors-of-active-shooters-in-us-2000-2013.pdf](http://www.fbi.gov/file-repository/pre-attack-behaviors-of-active-shooters-in-us-2000-2013.pdf)
- Call for Action to Prevent Gun Violence in the United States of America*, Interdisciplinary Group on Preventing School and Community Violence (February 2018): [curry.virginia.edu/prevent-gun-violence](http://curry.virginia.edu/prevent-gun-violence)
- Making Prevention a Reality: Identifying, Assessing, and Managing the Threat of Targeted Attacks*, Federal Bureau of Investigation (November 2016): [www.fbi.gov/file-repository/making-prevention-a-reality.pdf/view](http://www.fbi.gov/file-repository/making-prevention-a-reality.pdf/view)
- Guide for Developing High-Quality School Emergency Operations Plans*, U.S. Depts. of Education, Health and Human Services, Homeland Security, Justice, Federal Bureau of Investigation, and Federal Emergency Management Agency (June 2013): [rems.ed.gov/docs/REMS\\_K-12\\_Guide\\_508.pdf](http://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf)
- School Connectedness: Strategies for Increasing Protective Factors Among Youth*, Centers for Disease Control and Prevention (2009): [www.cdc.gov/healthyyouth/protective/pdf/connectedness.pdf](http://www.cdc.gov/healthyyouth/protective/pdf/connectedness.pdf).
- Prior Knowledge of Potential School-Based Violence: Information Students Learn May Prevent a Targeted Attack*, U.S. Secret Service and U.S. Dept. of Education (May 2008): [rems.ed.gov/docs/DOE\\_BystanderStudy.pdf](http://rems.ed.gov/docs/DOE_BystanderStudy.pdf)

*Guidelines for Responding to Student Threats of Violence*, Cornell, D. & Sheras, P. (2006).  
<https://curry.virginia.edu/uploads/resourceLibrary/8-2003-apa-guidelines-for-responding-to-student-threats-of-violence.pdf>

*The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States*, U.S. Secret Service (July 2004):  
[www2.ed.gov/admins/lead/safety/preventingattacksreport.pdf](http://www2.ed.gov/admins/lead/safety/preventingattacksreport.pdf)

### Illinois Resources

Ill. State Board of Education, School Emergency and Crisis Response Plan Guide:  
[www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx](http://www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx)

Ill. School and Campus Safety Resource Center: <http://ilschoolsafety.org/>

Ill. Emergency Management Agency, Ready Illinois Schools/Campus – Resources:  
[www2.illinois.gov/ready/plan/Pages/schools-resources.aspx#WorkingGroup](http://www2.illinois.gov/ready/plan/Pages/schools-resources.aspx#WorkingGroup)

*Recommendations of the Illinois Terrorism Task Force School Safety Working Group* (April 5, 2018): [iasb.mys1cloud.com/ITTFSchoolSafetyWorkingGroupRecs.pdf](http://iasb.mys1cloud.com/ITTFSchoolSafetyWorkingGroupRecs.pdf)

Ill. Attorney General, School Violence Tipline, 1 (800) 477-0024:  
[www.illinoisattorneygeneral.gov/children/schoolviolence.html](http://www.illinoisattorneygeneral.gov/children/schoolviolence.html)

Ill. Association of School Boards, School Safety and Security page:  
[www.iasb.com/safety/index.cfm](http://www.iasb.com/safety/index.cfm)

### School Climate Resources

National Center on Safe Supportive Learning Environments:  
[safesupportivelearning.ed.gov/index.php?id=133](http://safesupportivelearning.ed.gov/index.php?id=133)

World Health Organization Information Series on School Health's *Document 10, Creating an Environment for Emotional and Social Well-Being*:  
[www.who.int/school\\_youth\\_health/media/en/sch\\_childfriendly\\_03\\_v2.pdf](http://www.who.int/school_youth_health/media/en/sch_childfriendly_03_v2.pdf)

National School Climate Center: [www.schoolclimate.org](http://www.schoolclimate.org)

Rachel's Challenge, programs for creating a school climate less susceptible to harassment, bullying, and violence: [rachelschallenge.org](http://rachelschallenge.org)

Sandy Hook Promise, gun violence prevention programs:  
[www.sandyhookpromise.org/prevention\\_programs](http://www.sandyhookpromise.org/prevention_programs)

Serve 2 Unite, programs for combating hate, cultivating kindness, and creating student peacemakers: [www.giftofourwounds.com/serve2unite/](http://www.giftofourwounds.com/serve2unite/)

## Operational Services

### Administrative Procedure - Threat Assessment Team (TAT) 1

This procedure implements Threat Assessment Teams (TATs). TAT members are professional educators, mental health professionals, law enforcement professionals, and professionals from other disciplines as necessary who are trained in behavioral threat assessment. See p. 3 of 4:190-AP1, *Targeted School Violence Prevention Program*, for authority encouraging the establishment of TATs.

TATs function at the Building level, taking direction from the District-level School Violence Prevention Team. They address potential or developing threatening behavior exhibited not only by students, but from a broad range of individuals affecting the District environment, including: <sup>2</sup>

- Students: current and former (and potentially prospective)
- Employees: current and former (and potentially prospective)
- Parents/guardians of students
- Persons who are (or have been) in relationships with staff or students
- Contractors, vendors or other visitors
- Unaffiliated persons

Customize this procedure to each TAT's building-specific needs, and use it in conjunction with 4:190-AP1, *Targeted School Violence Prevention Program*; 4:190-AP2, E1, *Principles of Threat Assessment*; 4:190-AP2, E2, *Threat Assessment Documentation*; 4:190-AP2, E3, *Threat Assessment Key Areas and Questions; Examples*; 4:190-AP2, E4, *Responding to Types of Threats*; and 4:190-AP2, E5, *Threat Assessment Case Management Strategies*. This procedure contains five sections as follows:

1. Glossary of Terms
2. TAT Formation, Development, and Responsibilities
3. Assessing and Classifying Threats
4. Responding to and Managing Threats
5. Reporting Threats to Outside Agencies

#### Glossary of Terms

**Subject of Concern (Subject)** – an individual who has been identified to pose a threat of violence or serious harm to self/others.

**Target** – an individual who is the intended target of the threat posed by the subject of concern.

**Threat Assessment** – A fact-based process emphasizing an appraisal of observed (or reasonably observable) behaviors to identify potentially dangerous or violent individuals/situations, to assess them, and to manage/address them.

**Threat Assessment Team (TAT)** – A multidisciplinary Building-level team lead by the Building Principal to perform specific threat assessments.

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*The footnotes should be removed before the material is used.*

<sup>1</sup> Adapted from *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Second Edition (2016), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: [www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf](http://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf).

<sup>2</sup> See *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, p. 2.

**TAT Triage Team** – Consists of at least two members of the TAT designated by the Building Principal to triage reported cases of threatening behavior. Screens cases to determine if sufficient resources exist to address concerns or if review and/or action by the full TAT is appropriate.

**Types of Threats** –

**Low-Risk Threat:** Subject/situation does not appear to pose a threat of violence or serious harm to self/others, and any exhibited issues/concerns can be resolved easily.

**Moderate-Risk Threat:** Subject/situation does not appear to pose a threat of violence or serious harm to self/others at this time, but exhibits behaviors that indicate a continuing intent and potential for future violence or serious harm to self/others, and/or exhibits other concerning behaviors that require intervention.

**High-Risk Threat:** Subject/situation appears to pose a threat of violence, exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the plan, and may also exhibit other concerning behaviors that require intervention.

**Imminent Threat:** Subject/situation appears to pose a clear and immediate threat of serious violence toward self/others that requires containment and action to protect the District’s environment and/or identified or identifiable target(s), and may also exhibit other concerning behaviors that require intervention

TAT Formation, Development, and Responsibilities

Following are tasks to integrate TATs into the District’s Targeted School Violence Prevention Plan.

Actor	Action
Superintendent or designee	Ensures TATs are trained in threat assessment by a threat assessment expert. <sup>3</sup> Free statewide training is available through the Ill. School and Campus Safety Program, at: <a href="http://www2.illinois.gov/ready/plan/Pages/schools-training.aspx">www2.illinois.gov/ready/plan/Pages/schools-training.aspx</a> .
Building Principal	<p>Selects TAT members with expertise in:</p> <ul style="list-style-type: none"> <li>School administration, e.g., a principal or other senior administrator from the school(s) covered by the TAT and human resource professionals;</li> <li>Instruction, e.g., a teacher or administrator with recent instructional experience;</li> <li>Counseling, e.g., a school counselor, school psychologist and/or school social worker;</li> <li>Law enforcement, e.g., a school resource officer;</li> <li>Being a staff member in the building; and</li> <li>Other community resource persons (as members or consultants as determined by the TAT).</li> </ul> <p>Designates a TAT triage team. See 4:190-AP2, E2, <i>Threat Assessment Documentation</i>.</p> <p>When a tip or concern is raised, activates the TAT and uses this procedure.</p>
TAT	Receives education and seeks training resources, including 4:190-AP2, E1, <i>Principles of Threat Assessment</i> .

The footnotes should be removed before the material is used.

<sup>3</sup> Many threat assessment publications outline that the best practice is for the entire TAT, as a team, to attend in-person threat assessment training by a threat assessment expert.

Actor	Action
	<p>Receives threat assessment training by a threat assessment expert.</p> <p>Commits to work collaboratively with each other, with other school staff, and (as appropriate) with community resource persons to support the safety of the school, its students, and its staff.</p> <p>Actively, lawfully, and ethically communicates with each other, District administrators, and other school staff who have a need to know particular information to support the safety of the school, its students, and its staff.</p> <p>Trains staff, students, parents/guardians, and other members of the school community to recognize and report possible threats by conducting presentations, broadly disseminating relevant information, and ensuring access to consultation from the TAT.</p> <p>Identifies and trains members of the school community who can take reports of possible threats.</p> <p>Effectively implements Board policy 4:190, <i>Targeted School Violence Prevention Program</i>.</p>

**Assessing and Classifying Threats**

When a threat is reported, the Building Principal and TAT assess and classify the threat using the criteria and process outlined below.

Actor	Action
Building Principal	<p>Educates him/herself about <i>types</i> of threats.</p> <p>Determines if an imminent threat exists. If an imminent threat exists, notifies law enforcement in accordance with 4:170-AP1, <i>Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCR)</i>.</p>
Building Principal and/or TAT Triage Team	<p>If no imminent threat exists, or once an imminent threat is contained, triages threat (with the TAT Triage Team, if one is designated by the Building Principal) to determine if the full TAT must be involved. See 4:190-AP2, E2, <i>Threat Assessment Documentation</i>.</p> <p>Triage may include:</p> <ul style="list-style-type: none"> <li>Reviewing the threatening communication and/or behavior.</li> <li>Reviewing school and other records for any prior history or interventions with the individual(s) involved.</li> <li>Evaluating the threat in context so that the meaning of the threat and intent can be determined by, among other things, conducting timely and thorough interviews (as necessary) with the person(s) who reported the threat, the threat recipient(s)/target(s), other witnesses who have knowledge of the threat, and when reasonable, the subject of concern (subject) who allegedly engaged in the threatening communication and/or behavior.</li> </ul> <p>If the full TAT needs to be involved, convenes it as soon as possible.</p>
TAT	<p>Assesses the threat. See 4:190-AP2, E3, <i>Threat Assessment Key Areas and Questions; Examples</i>, for key questions to ask the person(s) who</p>

Actor	Action
	<p>reported the threat, the threat recipient(s)/target(s), other witnesses, and the subject in order to assess the threat.</p> <p>Once the assessment is complete, classifies the threat using the following basic criteria:</p> <p>Documents the threat assessment and classification using 4:190-AP2, E2, <i>Threat Assessment Documentation</i>, and ensures that TAT documentation follows the acronym FORT: 4</p> <ul style="list-style-type: none"> <li><b>F Fair</b> – sought to understand situations and give individuals an opportunity to be heard and understood;</li> <li><b>O Objective</b> – sought information based on facts and observations of the case and not speculation or bias;</li> <li><b>R Reasonable</b> – engaged in responses that were effective and proportionate to the situation; and</li> <li><b>T Timely</b> – quickly and responsively addressed reports of threatening behavior.</li> </ul>

Responding to and Managing Threats

Actor	Action
TAT	<p>Identifies appropriate responses to the threat based upon its level. See 4:190-AP2, E4, <i>Responding to Types of Threats</i>, for guidance on responses to each threat level.</p> <p>Develops, implements, and monitors an individualized, fact-based case management plan to intervene with, address, and reduce the threat by:</p> <ul style="list-style-type: none"> <li>Designating a TAT member as case manager to monitor the status of the subject and to notify the TAT of any change in status, response to interventions/referrals, or additional information that would be cause for reassessment and/or changes in interventions strategies;</li> <li>Assisting the subject, and any impacted staff or students, in accessing appropriate school and community-based resources for support and/or further intervention;</li> <li>Appointing one or more TAT members to engage directly with the subject to prevent the subject from becoming isolated; and</li> <li>Using the least intrusive interventions and strategies that are sufficient, fair, and reasonable to address the concerns identified. See 4:190-AP2, E5, <i>Threat Assessment Case Management Strategies</i>, for interventions and strategies, including those that are subject-based, target-based, and environmental/systems-based.</li> </ul> <p>Documents this process and any case updates using 4:190-AP2, E2, <i>Threat Assessment Documentation</i>.</p> <p>Submits updates regularly, e.g., at least every 30 days, until the case is resolved and the subject no longer poses a threat to the school, its students, or its staff.</p>

The footnotes should be removed before the material is used.

<sup>4</sup> Source: © G. Deisinger (1996).

Actor	Action
	Maintains documentation in accordance with Board policy, State records laws, and administrative procedures.

Reporting Threats to Outside Agencies

Following is the process to notify the Local Law Enforcement Agency (LLEA) and/or the Ill. Dept. of State Police (ISP) about certain types of threats:

Actor	Action
Superintendent or designee	<p>Reports to the LLEA batteries committed against teachers, teacher personnel, administrative personnel, or educator support personnel. 105 ILCS 5/10-21.7.</p> <p>Immediately notifies the LLEA and the ISP upon receiving a report from any school personnel regarding a verified incident involving:</p> <ul style="list-style-type: none"> <li>A firearm in a school or on school-owned or leased property. 105 ILCS 5/10-21.7A(c).</li> <li>Drugs in a school or on school-owned or leased property, including any conveyance owned, leased, or used by the school for the transport of students or school personnel. 105 ILCS 5/10-21.7B(b).</li> </ul>
Building Principal	<p>Reports to the LLEA threats to the safety and welfare of students and teachers by illegal use of drugs and alcohol, by illegal use or possession of weapons, or by gang activity. 105 ILCS 5/10-21.4a.</p> <p>Reports other threats to the LLEA as necessary and appropriate.</p> <p>Immediately notifies the LLEA upon receiving a report that any person has been observed in possession of a firearm on school grounds (other than a law enforcement official engaged in the conduct of his or her official duties).</p> <p>If the person found to be in possession of a firearm on school grounds is a student, the Building Principal or designee shall also immediately notify the student's parent/guardian. 105 ILCS 5/10-21.7A(b).</p> <p>Reports directly to the ISP within 24 hours of a determination that a student or other person poses a clear and present danger to himself, herself, or others. 430 ILCS 66/105 and 405 ILCS 5/6-103.3; 20 Ill.Admin.Code §1230.120(b).</p>

## Operational Services

### Exhibit - Principles of Threat Assessment 1

This exhibit is a resource to educate Building-level Threat Assessment Team (TAT) members about the assumptions and principles underlying behavioral threat assessment.

#### Assumptions

The following assumptions are informed by findings of the U.S. Secret Service and U.S. Dept. of Education's *Safe School Initiative*, as well as other research about targeted violence occurring in or related to educational settings. Key assumptions include:

1. Incidents of targeted violence at school/workplaces are rarely sudden, impulsive acts.
2. In addition to students, others also engage in targeted violence in schools, including administrators, teachers, other staff, parent(s)/guardian(s) of students, contractors, people in relationships with staff or students, and even people with no connection with the school.
3. Prior to most incidents of targeted violence, other people knew about the individual's idea and/or plan to attack.
4. Most individuals who perpetrated violence engaged in some behavior, prior to the incident, which caused others to have serious concerns about their behavior and/or well-being.
5. Many individuals who perpetrated violence had significant difficulties with losses or failures. Many were suicidal.
6. Many individuals who perpetrated violence felt bullied, persecuted, or injured by others prior to engaging in violence.
7. In many cases, others, e.g., staff, students, peers, family members, etc., were involved in some way, such as helping with plans or preparation for violence, encouraging violence, or failing to report (or take other steps) to prevent violence.
8. Most individuals who perpetrated violence did not threaten their targets directly prior to engaging in violence.
9. Violence is a dynamic process. No one is either always dangerous or never dangerous. Rather, the risk for violence is an interaction between the individual, the situation, circumstances, provocations, and inhibitory factors that are present.

The fact that most individuals engaged in pre-incident planning and preparation, and frequently shared their intentions, plans and preparations with others, suggests that the information about targeted violence is likely to be uncovered through a sound threat assessment process.

Targeted violence is the end result of a process of thinking and behavior that begins with an **idea**, e.g., to use violence to address a real or perceived grievance. The process of thinking and behavior progresses to the development of a **plan** and moves on to **preparation** and acquiring the means, e.g., weapons, training, capacity, access, to carry out the plan. The culmination, regrettably, can be in **violence**. A graphic representation of this process, the *Pathway to Violence*, is shown in Figure 1.

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**The footnotes should be removed before the material is used.**

<sup>1</sup> Adapted from *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Second Edition (2016), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: [www.dcls.virginia.gov/sites/dcls.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf](http://www.dcls.virginia.gov/sites/dcls.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf).

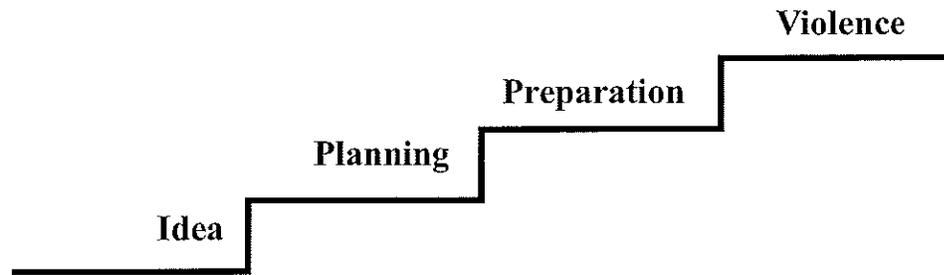


Figure 1: the *Pathway to Violence*

This process indicates opportunities to observe, identify, and intervene with threatening and/or aberrant behaviors that cause concern for violence by, or for the well-being of, the individual. Frequently, information about an individual's ideas, plans, and preparations for violence can be observed before violence occurs. However, information is likely to be scattered and fragmented. For example, a teacher may see a certain set of behaviors of an individual in her class, a coach observes other behaviors or expressed thoughts by the individual, a school resource officer has other concerns, and a school administrator is aware of certain conduct violations. The challenge, and the key, is to act quickly upon initial reports of concern, gather other pieces of the puzzle, and assemble them to determine what picture emerges.

#### Principles

To determine the risk of a threat, the TAT focuses on actions/behaviors, communications, and specific circumstances that might suggest that an individual intends to engage in violence and is planning or preparing for that event. The threat assessment process is centered upon an analysis of the known (or reasonably knowable) behavior(s) in a given situation.

TATs train to focus on the following core principles of threat assessment:

1. **The central question in a threat assessment inquiry is whether an individual poses a threat (i.e., is building the capability to cause harm), not just whether the person has made a threat (directly expressed intent to harm).** Research on targeted violence in schools and workplaces has found that fewer than 20 percent of violent perpetrators communicated a direct or conditional threat to their target before the violence. In the majority of incidents, perpetrators did not directly threaten their targets, but they did communicate their intent and/or plans to others before the violence. This indirect expression or third party communication of intent to cause harm is often referred to as *leakage*. The absence of a direct threat should not, by itself, cause a team to conclude that a subject does not pose a threat to others.
2. **Targeted violence is the end result of an understandable, and often discernable, process of thinking and behavior, often referred to as the *Pathway to Violence*, noted above in Figure 1.** Individuals who committed targeted violence did not “just snap,” but engaged in a process of thought and escalation of action over days, weeks, months, and even years.
3. **Targeted violence stems from an interaction among the Subject(s), Target(s), Environment, and Precipitating Events (STEP).** Identifying, preventing, and intervening with acts of violence requires a focus on these four components and their interaction. A focus on the *Subject* of concern should provide insight into how the individual perceives and deals with conditions, often stressful, in his or her life and the intensity of effort they direct toward planning and preparation for violence. A focus on the *Target* examines choices and coping strategies they are using or responding with that may increase or decrease their risk for harm.

A focus on the *Environment* examines the school/workplace climate and systemic issues that contribute to the risk of violence, or do not discourage it. A focus on *Precipitating* events examines critical stressors or events such as bullying, personal losses, enforcement actions, or even TAT interventions that may increase or decrease the risk for violence.

4. **An investigative, skeptical, inquisitive mindset is critical to successful threat assessment.** Those who carry out threat assessment must strive to be both accurate and fair, continuing throughout the assessment process both to gather pieces of information and to fit the pieces into a larger picture to gain understanding of the context and situation.
5. **Effective assessment is based upon facts and observations of behavior, rather than on characteristics, traits, or profiles. Perpetrator profiles do not provide a reliable basis for making judgments of the threat posed by a particular individual.**
6. **An integrated systems approach, coordinating between local agencies and service systems within the school and community, should guide the threat assessment and management process.** Relationships with agencies and service systems within the school (e.g., school psychologist, school social worker, school counselor, school-based mental health clinicians, administrators, disciplinary officers, human resources, etc.) and community (e.g., mental health providers, juvenile justice system, child welfare agencies, law enforcement, etc.) are critical to identifying, assessing, and managing individuals who are on the *Pathway to Violence*.

## Operational Services

### Exhibit - Threat Assessment Documentation

*Imminent threats require immediate containment and action to protect the District's environment and/or identified or identifiable target(s). A Threat Assessment Team (TAT) does not document its activities in response to an imminent threat until after the threat is contained.*

The Virginia Center for School and Campus Safety has created a model *Threat Assessment Triage and Assessment Form* (Form) containing eight parts, on pages 31-41 in a publication entitled *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Second Edition (2016), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services at: [www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf](http://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf).

The Form contains investigation questions designed to help a TAT gather information to identify, assess, classify, respond to, and manage threats of targeted violence to the District's environment. Modify the questions on the Form to reflect the District's local conditions and each TAT's specific building needs. Members of the TAT should use the Form to document threat assessment activities and in conjunction with 4:190-AP1, *Targeted School Violence Prevention Program*; 4:190-AP2, *Threat Assessment Team (TAT)*; 4:190-AP2, E1, *Principles of Threat Assessment*; 4:190-AP2, E3, *Threat Assessment Key Areas and Questions; Examples*; 4:190-AP2, E4, *Responding to Types of Threats*; and 4:190-AP2, E5, *Threat Assessment Case Management Strategies*.

Consult the Board Attorney for recordkeeping procedures when or if the information gathered and entered in the Form is placed in a student's temporary record. See also Board policy 7:340, *Student Records*.

## Operational Services

### Administrative Procedure - Threat Assessment Key Areas and Questions; Examples 1

This exhibit provides examples for Building-level Threat Assessment Team (TAT) members to use when assessing reports of threats to the District's environment. TAT members use this exhibit to assess a threat while following 4:190-AP2, *Threat Assessment Team (TAT)*.

#### Key Areas of Assessment

Review and use the following **key areas** of assessment. This is not intended as an exhaustive or complete list of areas of inquiry. Additional questions may be asked for clarification and/or to probe more deeply to fully understand the circumstances.

Before conducting an interview with a subject of concern (subject): (1) learn the facts that brought the subject to the attention of school administrators and others; and (2) review information about the subject's background, interests, and behaviors.

**Key Area: Interview with person(s) who reported the threat, threat recipient(s)/target(s), and other witness(es):** Interview, when possible, all persons who witnessed the reported and/or concerning behavior, including the subject and all recipients/targets. Inform the subject that the primary purpose of the interview is to gather information about a possible situation of concern and, when possible, prevent harm to staff members and/or students.

Ask potential targets of the threat about their relationship to the subject and any recent interactions with him or her. Gather information about grievances and grudges that may exist in these relationships. Conduct interviews of potential targets with special sensitivity and gather information without alarming them. If you believe a risk of violence to a potential target exists, offer him/her any available assistance and support for their safety.

Because the process provides a revised understanding of the situation in real time, always review new incoming information and re-evaluate the threat. Maintain contact with the targets to obtain information about any more concerning behaviors, improvements to the situation, or other developments.

**Key Area: Review records and consult with staff who know the subject:** Background information may assist with the approach to and questioning of the subject. It may also help determine whether the subject poses a threat to particular targets. Knowing background information before the interview may help determine whether the subject is honest. Areas that may contain helpful background information include:

1. Recent or historical work or school performance history
2. Disciplinary or personnel actions
3. Prior TAT contacts
4. Law enforcement or security contacts at school and/or in the community
5. Any involvement with mental health or social services
6. Presence of problems in the subject's life
7. Current or historical grievances that may be related to the behavior of concern

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<sup>1</sup> Adapted from *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Second Edition (2016), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: [www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf](http://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf).

8. Electronic searches: Internet, social media, email, etc.

**Key Area: Interview with the subject:** Directly ask a subject who is a staff member or student about his/her reported actions and/or intentions. Many subjects will respond truthfully to direct questions when they are asked in a non-judgmental manner. This interview could elicit important information to understand a subject's situation and identify possible targets, which can assist the assessment of the risk of violence. More leads for further assessment may also arise.

Interviews send the message to the subject that the District noticed his/her behavior, and it caused concern. They also provide the subject an opportunity to: (1) tell his/her perspective, background, and intent; (2) be heard and experience support; and (3) reassess and redirect his/her behavior away from concerning activities. To a subject who has mixed feelings about attacking, an interview may suggest people are interested in his/her welfare, and that there are better, more effective, ways to deal with challenges or with specific people.

While interviewing a subject might provide valuable information, relying solely on that interview to make judgments about whether the subject poses a threat likely presents problems. Information offered during the interview may be incomplete, misleading, or inaccurate; and seeking corroboration and verifying information learned during the interview is very important.

#### Key Questions to Ask

Thoughtful consideration of the answers to the following key questions will produce a foundation for the TAT's response to the main question in its assessment: Does the subject pose a threat of targeted violence toward the District's environment?

Examine information gathered for evidence of behavior and conditions that suggest the subject is planning and preparing for an act of violence and/or to cause harm to him/herself or others in the District environment. Based on a review of the totality of the information available, try to answer the following questions:

- 1. What are the subject's motive(s) and goal(s)? What first brought him/her to someone's attention?**
  - Does the subject have a major grievance or grudge? If so, against whom?
  - Does the situation or circumstance that led to these statements or actions still exist?
  - What efforts have been made to resolve the problem and what was the result?
  - Does the subject feel that any part of the problem is resolved or see any alternatives?
  - Has the subject previously come to someone's attention or raised concern in a way that suggested he or she needs intervention or supportive services?
- 2. Have there been any communications suggesting ideas, intent, planning, or preparation for violence?**
  - What, if anything, has the subject communicated to someone else (targets, friends, co-workers, others) or written in a diary, journal, email, or website concerning his/her grievances, ideas and/or intentions?
  - Do the communications provide insight about ideation, planning, preparation, timing, grievances, etc.?
  - Has anyone been alerted or *warned away*?
- 3. Has the subject shown any inappropriate interest in, fascination, and/or identification with other perpetrators and/or incidents of mass or targeted violence, e.g., terrorism, school/workplace shootings, mass murderers:**
  - Previous perpetrators of targeted violence?
  - Grievances of perpetrators?

Weapons/tactics of perpetrators?  
Effect or notoriety of perpetrators?

**4. Does the subject have, or is he/she developing, the capacity to carry out an act of targeted violence?**

How organized is the subject's thinking and behavior?  
Does the subject have the means, e.g., access to a weapon, to carry out an attack?  
Is he/she trying to get the means to carry out an attack?  
Has he/she developed the will and ability to cause harm?  
Has he/she practiced or rehearsed for the violence?  
What is the *intensity of effort* expended in attempting to develop the capability?

**5. Is the subject experiencing hopelessness and/or desperation?**

Is there information to suggest that the subject is feeling hopeless or desperate?  
Has the subject experienced a recent failure, loss, and/or loss of status?  
Is the subject having significant difficulty coping with a stressful event?  
Has the subject engaged in behavior that suggests that he/she has considered suicide?

**6. Does the subject have a positive, trusting, sustained relationship with at least one responsible person?**

Does the subject have at least one friend, colleague, family member, or other person that he/she trusts and can rely upon for support, guidance or assistance?  
Is that trusted person someone that would work collaboratively with the TAT for the well-being of the subject?  
Is the subject emotionally connected to other people or becoming more socially isolated?

**7. Does the subject see violence as an acceptable, desirable – or the only – way to solve a problem?**

Does the subject still perceive alternatives to violence to address his/her grievances?  
Does the setting around the subject (friends, colleagues, family members, others) explicitly or implicitly support or endorse violence as a way of resolving problems or disputes?  
Has the subject been “dared” by others to engage in an act of violence?  
Has the subject expressed sentiments of finality or desperation to address grievances?

**8. Are the subject's conversation and story consistent with his/her actions?**

Does information from other interviews and the subject's own behavior confirm or dispute what the subject says is happening and how he/she is dealing with it?  
Is there corroboration across sources or are the subject's statements at odds with his/her actions?

**9. Are other people concerned about the subject's potential for violence?**

Are those who know the subject concerned about him/her: (a) taking action based on violent ideas or plans; (b) targeting a specific person; or (c) engaging in protective actions, e.g., distancing, avoiding, minimizing conflict, etc.?

**10. What circumstances might affect the likelihood of an escalation to violent behavior?**

What events or situations in the subject's life, now or in the near future, may increase or decrease the likelihood that the subject will engage in violent behavior?  
Are TAT interventions escalating, de-escalating, or having no effect on movement toward violence?  
What is the response of others who know about the subject's ideas or plans? Do others: (a) actively discourage the subject from acting violently; (b) encourage the subject to attack; (c) deny the possibility of violence; or (d) passively collude with an attack, etc.?

## Operational Services

### Exhibit - Responding to Types of Threats <sup>1</sup>

After a threat is assessed, use this exhibit with subhead **Responding to and Managing Threats** in 4:190-AP2, *Threat Assessment Team (TAT)*. Each threat level listed provides research-based appropriate responses for TATs.

#### Imminent Threat Responses

Imminent threats require immediate: containment and action to protect the target, referral to law enforcement, and consultation with school security. Following containment and action to protect the target, the TAT becomes involved and follows the procedures set forth in High-Risk Threat Responses.

#### Low-Risk Threat Responses

Resolve a low-risk threat case with any of the following, as appropriate:

1. No further action;
2. Have involved individuals issue a clarification, explanation, retraction and/or an apology;
3. Refer the subject for disciplinary action in accordance with Board policy; and/or
4. Refer the subject and/or target to school and/or community-based resources.

If the subject and/or target is referred for resources or services, a member of the TAT is designated to monitor the subject's/target's reactions for a short period of time, to ensure the referral was effective.

When the target is a student the TAT may, at its discretion, notify the target and his/her parent(s)/guardian(s). If the parent(s)/guardian(s) are notified, contact them promptly and reassure them that the threat has been resolved. That TAT may also notify parent(s)/guardian(s) of the subject, so they are aware of the situation and that it has been resolved.

If new information comes to the attention of the TAT, reassess and update the case management plan.

#### Moderate-Risk Threat Responses

Resolve a moderate-risk threat case with any of the following, as appropriate:

1. Protect the target with the following precautions:
  - a. Direct supervision to prevent the threat while at school, at school functions, or on the bus.
  - b. Caution the subject about the consequences of carrying out the threat.
  - c. Notify the target and (if he/she is a student) the target's parent(s)/guardian(s) of the threat, the seriousness of the threat, the identity of the subject who made the threat, and what actions are being taken to support the safety of the target and the school as a whole.
  - d. When the subject is a student, contact the subject's parent(s)/guardian(s) to assume responsibility for supervising the subject and to enlist their support to prevent the subject from carrying out the threat.
2. Consult with the school resource officer to assist in monitoring and supervising the subject and determine the need, if any, for law enforcement action.
3. Refer the subject for disciplinary action in accordance with Board policy.

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The footnotes should be removed before the material is used.

<sup>1</sup> Adapted from *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Second Edition (2016), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: [www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf](http://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf).

4. Refer the subject and/or target for counseling, conflict mediation, or other interventions to reduce the threat and to address the underlying conflict/issues that led to the threat. The Building Principal will involve school-based professionals and/or community-based professionals who can provide assistance and appropriate intervention.
5. Conduct a mental health risk assessment when the TAT reasonably believes that mental health or disability issues are causing or contributing to the risk of violence. Follow parameters for the mental health risk assessment as outlined in High-Risk Threat Responses, below.

#### High-Risk Threat Responses

Resolve a high-risk threat with any of the following, as appropriate:

1. Notify law enforcement to contain the threat and to consult regarding school safety and security.
2. Immediately protect the target with the following precautions:
  - a. Direct supervision to prevent the threat while at school, at school programs, or on the bus.
  - b. Caution the subject about the consequences of carrying out the threat.
  - c. Notify the target and (if he/she is a student) the target's parent(s)/guardian(s) of the threat, the seriousness of the threat, the identity of the subject who made the threat, and what actions are being taken to support the safety of the target and the school as a whole.
  - d. When the subject is a student, contact the subject's parent(s)/guardian(s) to enlist their support to prevent the subject from carrying out the threat; have either law enforcement or the subject's parent(s)/guardian(s) assume responsibility for supervising the subject.
3. Refer the subject for disciplinary action in accordance with Board policy.
4. Conduct a mental health risk assessment when the TAT reasonably believes that mental health or disability issues are causing or contributing to the risk of violence. The mental health risk assessment will be conducted by a qualified independent medical/psychological professional who does not have a treatment relationship with the subject. The professional will base his/her assessment on a review of all available information, including but not limited to an interview of the subject by the professional. The professional will prepare a written report that identifies the problem/conflict that prompted the threat and recommends strategies to address the problem/conflict and to reduce the risk of violence.
  - a. The Building Principal will determine the conditions for the subject's readmission to school, which may include requiring the subject to cooperate in a mental health evaluation. If the subject is a student, the parent(s)/guardian(s) will be notified of all readmission requirements and of any failure to comply. A readmission meeting will be held prior to the subject's return to school.
  - b. The TAT will attempt to obtain any required signed permission for release and exchange of information with mental health provider(s), if any, and where appropriate, LLEAs.
  - c. After receiving the mental health risk assessment report, the TAT will convene to complete and implement a written safety plan that includes immediate steps to prevent the threat from being carried out and a plan for further action before the subject is permitted to return to school or an alternative educational environment. The safety plan will include:
    - Readmission conditions;
    - Interventions, such as counseling or medication, that are needed to reduce risk;
    - Scheduled follow-up contact with the subject (and parent(s)/guardian(s) if subject is a student) to assess changes in risk and update the safety plan over time, until the perceived threat is resolved; and
    - The identities of person(s) responsible for monitoring and verifying that the safety plan is being followed.

A student/staff member should only be removed if the threatening behaviors engaged in by the subject are a violation of the code of conduct/Board policy, and when all applicable disciplinary procedures are followed.

In the event that applicable disciplinary procedures are not available to school-based staff, and the school administration or TAT believes the subject poses a significant risk to the health or safety of others that cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of auxiliary aids or services as provided in federal regulations implementing the Americans with Disabilities Act of 1990 (ADA) at 28 C.F.R. §35.139, the ADA's direct threat standard may be applied. Before applying the ADA's direct threat standard, the Building Principal will contact the District's Director of Special Education and Board Attorney (through the Superintendent, if not authorized to contact the Board Attorney directly).

## Operational Services

### Exhibit - Threat Assessment Case Management Strategies 1

Case management is a critical component of Building-level Threat Assessment Team (TAT) work. TATs use this exhibit to examine four types of research-based case management strategies when developing a case management plan in response to a threat. Types include: subject-based, target-based, environmental/system, and monitoring for the impact of precipitating events. See subhead **Responding to and Managing Threats** in 4:190-AP2, *Threat Assessment Team (TAT)*.

Case management integrates interventions, as appropriate, across the following relevant domains: 2

- S** De-escalate, contain, or control the **subject** who may take violent action;
- T** Decrease vulnerabilities of the **target**;
- E** Modify physical and cultural **environment** and systems to discourage escalation; and,
- P** Prepare for and mitigate against **precipitating events** that may trigger adverse reactions.

#### Subject-Based Case Management Strategies

Schools regularly use many of the following examples of interventions or strategies to address inappropriate behavior including, but not limited to, threatening behavior. TATs focus on interventions that de-escalate, contain, control, and redirect the subject away from plans and preparation for violence; and toward engaging with others, problem solving, adapting, and improving their coping skills and well-being. Examples include, but are not limited to:

1. Maintain channel of communication and engagement (with subject) to:
  - a. Gather information
  - b. Build rapport and relationship
  - c. Decrease isolation
  - d. De-escalate volatile reactions
  - e. Provide feedback and mentoring
  - f. Monitor reactions to grievances, interventions, and precipitating events
2. Problem-solving about legitimate grievances
3. Referral for assistance or support services, such as:
  - a. Academic assistance or accommodations
  - b. Social skills training
  - c. Behavioral contracting
  - d. Modification of student classroom assignment or schedule
  - e. Modification of work schedule or assignments
  - f. Alternative schooling/home schooling
  - g. Involvement in extra-curricular activities
  - h. Performance improvement plans
  - i. Peer coaching/mentoring

**The footnotes should be removed before the material is used.**

<sup>1</sup> Adapted from *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Second Edition (2016), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: [www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf](http://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf).

<sup>2</sup> Source: © G. Deisinger & M. Randazzo (2008).

4. Counseling/mental health services, such as:
  - a. Check-in/check-out with school counseling staff
  - b. Outpatient counseling/mental health care
  - c. Emergency psychiatric evaluation
5. Disciplinary measures, such as:
  - a. Subject confrontation or warning
  - b. Administrative orders for no contact or communication
  - c. Detention
  - d. Suspension
  - e. Termination/expulsion
  - f. Law enforcement involvement
  - g. Court-issued protective orders
  - h. Diversion programs

TATs select intervention strategies with the greatest potential for addressing short-term crises as well as longer-term preventive power. While holding students and staff accountable for their actions, school administrators will be fair and reasonable in disciplinary responses. Disciplinary responses may be combined with other actions such as parent/guardian conferences, modifications of student classroom assignment or schedule, and referrals to in-school and community-based programs.

TATs recognize that even fair and reasonable discipline can be perceived by the subject as punitive discipline, which may lead to escalating threatening behavior. Suspension, expulsion or termination may risk triggering an immediate or delayed violent response unless they are coupled with containment and support. Suspension, expulsion, or termination options that focus solely on accountability and controlling the subject do not address the ongoing challenges of:

1. Moving the subject away from thoughts and plans of, and capacity for, violence and/or disruption;
2. Connecting the subject to resources (when needed);
3. Mitigating organizational/systemic factors; and
4. Monitoring the subject when he/she is no longer connected to the District.

In addition, a student who is suspended or expelled is often under less supervision than if he/she were to remain in a school setting. A student who is expelled may conclude: "I have lost everything. I have only a short time to act. I will give them what they deserve." TATs consider and plan for those responses by using separation strategies intentionally, being aware of their limitations, and anticipating their consequences.

#### Target-Based Case Management Strategies

TATs attempt to minimize risk and negative impact on targets and seek to maintain contact with targets (where appropriate) to help monitor the actions and impact of the subject. Examples of target-based case management strategies include, but are not limited to:

1. Coaching regarding personal safety approaches in dealing with the subject:
  - a. Clear statements to the subject, e.g., "relationship/contact is unwanted" or "stop all contact and/or communication"
  - b. Avoid subsequent contact/response
  - c. Document all further contacts
  - d. Do not engage emotionally, monitor "buttons" getting pushed
2. Minimize publicly available information, e.g., by scrubbing internet information, checking privacy settings on social media applications

3. Maintain awareness of surroundings
4. Vary routine
5. Develop contingency plans for escape, shelter, and support
6. Encourage use of support systems, e.g., counseling/mental services and victim assistance programs

#### Environmental/System Case Management Strategies

TATs take a holistic view of the situation, monitoring for underlying systemic causes that may be contributing not just to a given case, but perhaps to a range of cases over time. This level of intervention focuses on group and subgroup behavior, not just that of the subject or target. Strategies include, but are not limited to:

1. Address systemic, policy, or procedural problems that may serve as precipitating events across cases
2. Bullying prevention/intervention programs
3. Enhance school/workplace climate – build and support a caring community
4. Intervene with associates that support or encourage violent behavior
5. Enhance conflict management skills of subgroups
6. Identify and address gaps in awareness of reporting and intervention options
7. Identify and address gaps in the threat assessment and management process

#### Monitoring for the Impact of Precipitating Events on Case Management

TATs recognize that cases do not occur in a vacuum and that life continues while they are assessing and intervening with a given case. TATs maintains an ongoing, long-term approach to anticipating, monitoring for, and (to the extent possible) managing the impact of potential precipitating events such as:

1. Loss impacting the subject, e.g., job or income, status, relationship, health, rejection/ostracization
2. Injustice
3. Implementation of administrative notices/court orders
4. Violation of administrative notices/court orders
5. Anniversary events, e.g., date of beginning of relationship, date of end of relationship, date served with court orders/separation documents, birthdays, holidays
6. Contagion effect of other high-profile or locally significant acts of violence

# REPLACES 4:170-AP7, E3

July 2013/February/March 2019

4:170-AP7, E34:190-AP2, E6

## Operational Services

### Exhibit - Targeted School Violence Prevention and Threat Assessment Education

*On District letterhead*

Date:

To: District Staff and Parent(s)/Guardian(s)

From: Building Principal

Re: Targeted School Violence Prevention Program

Student safety is our District's top priority. To maximize safety, the District uses a threat assessment process to identify *threats* and prevent *targeted school violence*. This process is part of the Targeted School Violence Prevention Program (Program). For more information, see Board policy 4:190, *Targeted School Violence Prevention Program*. The Program is part of the preparedness and response phases of the School Emergency Operations and Crisis Response Plan, which in turn is part of the District's Comprehensive Safety and Security Plan.

The District wishes to create a climate that encourages sharing *any* information about a safety concern with a trusted adult who can help. **Sharing information about threats and safety concerns is everyone's responsibility: students, parents/guardians, staff, and community members.** The question-and-answer section below is designed to help students, parents/guardians, and staff understand when school officials want individuals to share information about a safety concern.

#### What Is a Threat?

A threat is a concerning 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 could cause harm to self or others. It may be expressed/communicated orally, visually, in writing, electronically, or in another way. Threats may be direct ("I'm going to beat you up" or "I'm going to blow this place up!") or indirect ("Come and watch what I am going to do to her."). A threat can be vague ("I'm going to hurt him.") or implied ("You better watch out."). Any possession of a weapon or mention of one is a possible threat.

A threat is a threat *regardless* of whether it is observed by or communicated directly to the target of the threat or is observed by or communicated to a third party; and regardless of whether the target of the threat is aware of the threat.

Sometimes students make threats that may seem funny or "just kidding," but sometimes a threat is very serious and/or criminal. **When you are in doubt as to whether the statement is kidding or serious, the responsible thing to do is to tell the Principal or other responsible staff member.**

#### What Is Targeted School Violence?

Targeted School Violence includes school shootings and other school-based attacks where the school was deliberately selected as the location for the attack and was not simply a random site of opportunity. Individuals who have committed targeted violence did not "just snap," but engaged in a process of thought and escalation of action over days, weeks, months, and even years.

In the majority of incidents of targeted violence, perpetrators did not directly threaten their targets, but they *did* communicate their intent and/or plans to others before the violence. This indirect

4:170-AP7, E34:190-AP2, E6

Page 1 of 2

expression or third party communication of intent to cause harm is often referred to as *leakage*. Reporting *leakage* is key to preventing targeted school violence.

#### Who Is Required to Report Threats?

All District staff, volunteers, and contractors are required to report any expressed threats or behaviors that may represent a threat to the community, school, or self to the Building Principal. Parents/guardians and students are also encouraged to report any such threats to the Building Principal.

Reported threats are assessed by the school's Threat Assessment Team (TAT). Each TAT includes people with expertise in counseling, instruction, school administration, and law enforcement. The goal of the threat assessment process is to take appropriate preventive or corrective measures to maintain a safe and secure school environment, to protect and support potential victims, and to provide assistance, as needed, to the individual being assessed.

**The threat assessment process does not preclude anyone from acting immediately to address an imminent threat.**

#### What Can Staff and Parents/Guardians Do?

The TAT will provide guidance to students and staff regarding recognizing threatening or unusual behavior that may represent a threat to the community, school, or self. Staff and parents/guardians can reinforce this guidance by discussing with students what a threat is, encouraging students not to make threats or "just kidding" statements in the first place, and reiterating that seeking help to prevent someone from getting hurt or hurting another by reporting threats is appropriate.