March 2024 4:190

Operational Services

Targeted School Violence Prevention Program ¹

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.² 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:

The footnotes should be removed before the material is used.

While this sample policy is optional, 105 ILCS 128/45, amended by P.A.s 102-791 and 103-175, required school districts to implement a threat assessment procedure by 12-21-19 that may be part of a school board targeted school violence prevention policy. Thus, regardless of whether the board adopts a policy, an administrative procedure must exist to comply with the law. See the first sentence in f/n 2 below. It contains items from Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines, Fifth Edition (July 2023), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-12 threat assessment management mppg mpd.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 2004 publication of the U.S. Secret Service and the U.S. Dept. of Education, at: www2.ed.gov/admins/lead/safety/threatassessmentguide.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.secretservice.gov/sites/default/files/reports/2020-10/USSS NTAC Enhancing School Safety Guide.pdf. See also Averting Targeted School Violence, a 2021 publication of the U.S. Dept. of Homeland Security and the U.S. Secret Service, at: www.secretservice.gov/sites/default/files/reports/2021-03/USSS%20Averting%20Targeted%20School%20Violence.2021.03.pdf.

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 how local conditions and resources and current practices will support the full implementation of the requirements of 105 ILCS 128/45, amended by P.A.s 102-791 and 103-175. Its goals and program will be most effective when they reflect local conditions and circumstances.

² To balance the requirement to implement a threat assessment procedure (105 ILCS 128/45, amended by P.A.s 102-791 and 103-175) with the practicalities of managing a district and to align with the best practices outlined in IASB's Foundational Principles of Effective Governance (www.iasb.com/conference-training-and-events/training/training-resources/foundational-principles-of-effective-governance/), this sentence delegates the duty to implement a procedure to the superintendent. See 4:190-AP1, Targeted School Violence Prevention Program, for a sample implementation procedure. 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.secretservice.gov/sites/default/files/reports/2020-10/USSS NTAC Enhancing School Safety Guide.pdf.

- 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). ³
- 2. Establish Building-level Threat Assessment Team(s)⁴ to assess and intervene with individuals whose behavior may pose a threat to safety. This team may serve one or more schools.
- 3. Require all District staff, volunteers, and contractors to report any expressed threats or behaviors that may represent a threat to the community, school, or self. ⁵
- 4. Encourage parents/guardians and students to report any expressed threats or behaviors that may represent a threat to the community, school, or self. ⁶
- 5. 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. ⁷

³ 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/policy-services-and-school-law/guidance-and-resources/school-safety-and-security/. 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. See f/n 4, below.

⁴ 105 ILCS 128/45, amended by P.A.s 102-791 and 103-175, required school districts to establish a threat assessment team by 2-19-20. If a school district is unable to establish a threat assessment team with school district staff and resources, it may use a regional behavioral threat assessment and intervention team. <u>Id.</u> The district's threat assessment procedure and a list identifying the members of all district threat assessment teams must be filed with a local law enforcement agency and the regional office of education or appropriate intermediate service center before the start of each school year. 105 ILCS 128/45(b), amended by P.A.s 102-791 and 103-175. See 4:190-AP2, *Threat Assessment Team (TAT)*, and its accompanying exhibits for further information on threat assessment teams and how to connect with a regional behavioral threat assessment team. Records concerning the work of the TAT, including but not limited to any threat assessment procedure, are exempt from disclosure under the III. Freedom of Information Act. 5 ILCS 140/7(II), added by P.A. 102-791.

⁵ In alignment with this policy, sample administrative procedure 4:190-AP2, *Threat Assessment Team (TAT)*, requires the TAT to train staff and other members of the school community to recognize and report possible threats, and sample exhibit 4:190-AP2, E6, *Targeted School Violence Prevention and Threat Assessment Education*, requires all district staff, volunteers, and contractors to report any expressed threats or behaviors that may represent a threat to the community, school, or self.

⁶ In alignment with this policy, sample administrative procedure 4:190-AP2, *Threat Assessment Team (TAT)*, requires the TAT to train parents/guardians and other members of the school community to recognize and report possible threats, and sample exhibit 4:190-AP2, E6, *Targeted School Violence Prevention and Threat Assessment Education*, encourages parents/guardians and students to report any expressed threats or behaviors that may represent a threat to the community, school, or self.

⁷ 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.

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), 6:270 (Guidance and Counseling Program), 7:140 (Search and Seizure), 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

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 14 in sample 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*, Fifth Edition (July 2023), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-

12 threat assessment management mppg mpd.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 withdrawal or isolation of subjects from peers and family members;
- Sullen or depressed behavior from an otherwise friendly and positive person;
- Atypical or out-of-context outbursts of verbal or physical aggression;
- Increased levels of agitation, frustration, or anger;
- Confrontational, accusatory, or blaming behavior;
- An atypical interest in or fascination with weapons or acts of violence; 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.

Pose a Threat – To pose a threat means an individual has, or is in the process of obtaining, the intent and capability to cause harm to self or others through planning and preparation.

Protective Factors – Characteristics or resources that make it less likely that an individual will engage in violence.

Risk Factors – Characteristics that make it more likely that an individual may engage in violence. Risk factors are usually stable over time.

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'/guardians', and school

personnel's experience of school life; it also reflects norms, goals, values, interpersonal relationships, teaching and learning practices, and organizational structures. ¹

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 (SEOCRP) in 4:170-AP1, 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 may pose 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 subheads Glossary of Terms and Assessing and Classifying Threats in 4:190-AP2, Threat Assessment Team (TAT).

Threat Assessment – A systematic, fact-based process emphasizing an appraisal of observed (or reasonably observable) behaviors to identify potentially disruptive, dangerous, or violent 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 TAT members, the function of TATs, and their procedures, see 4:190-AP2, *Threat Assessment Team (TAT)*.

Warning Signs – Characteristics or behaviors that are associated with a current or escalating risk of violence. These tend to be dynamic, acute, and often associated with new stresses, events, losses, or failures.

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	Selects School Violence Prevention Team (SVP Team) members from throughout the community to include: Building Principals (Building Principals are mandatory for
	successful implementation of a TSVP Plan).
	District Safety Coordinator (see 4:170-AP1, Comprehensive
	Safety and Security Plan, Part C, District Safety

¹ Definition adapted from the National School Climate Center. See www.schoolclimate.org/about/our-approach/what-is-school-climate.

Actor	Action
	Coordinator and Safety Team; Responsibilities)
	Teachers
	Law enforcement representatives
	Board Attorney ²
4	District psychologist(s), social worker(s), and/or counselor(s)
	Other mental health workers and/or social service agencies
	Faith leaders
	Community members
	Students
	Chairs and convenes SVP Team meetings for the purpose of developing a TSVP Plan.
	Determines whether to recommend that the Board assess the District's conditions for development and learning (see 7:180-AP1, <i>Prevention, Identification, Investigation, and Response to Bullying</i> , for resources and more discussion).
	Informs the Board of the SVP Team's progress, needs, and recommendations by adding information items to the Board's agendas as needed. ³
	Prior to the start of each school year, files 4:190-AP2, <i>Threat Assessment Team (TAT)</i> , and a list identifying the members of all TATs with: (1) a local law enforcement agency, and (2) the Regional Office of Education or Intermediate Service Center, as applicable. 105 ILCS 128/45(b), amended by P.A.s 102-791 and 103-175. Informs the Board that this filing was completed.
SVP Team	Meets when called by the Superintendent for the purpose of: (1) developing a TSVP Plan, and (2) creating, implementing, and monitoring TATs.
SVP Team, cont'd	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

 $^{^2}$ 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.

³ See sample 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: https://rems.ed.gov/docs/ED_BystanderStudy.pdf.

Actor	Action
	www.iasb.com/IASB/media/School- Safety/ITTFSchoolSafetyRecommendations.pdf.
	Ensures that the District's TSVP Plan complies with applicable civil rights statutes and other State and federal laws.
	Ensures that all District staff are annually trained ⁴ and understand the TSVP Plan, the role of the SVP Team, and the role a TAT.
	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.
	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.
	Identifies Board policies and procedures or equivalent topics that possibly affect a TSVP Plan, including but not limited to:
	1:20, District Organization, Operations, and Cooperative Agreements
	2:150, Committees
	2:240, Board Policy Development
	2:270, Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited
	3:40, Superintendent
SVP Team, cont'd	3:60, Administrative Responsibility of the Building Principal
	4:165, Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors
	4:170, <i>Safety</i>
	4:190, Targeted School Violence Prevention Program
	5:90, Abused and Neglected Child Reporting
	5:100, Staff Development Program
	5:130, Responsibilities Concerning Internal Information
	5:230, Maintaining Student Discipline
	6:65, Student Social and Emotional Development
	6:120, Education of Children with Disabilities

⁴ Annual training is not required. Amend the training requirement to reflect local conditions and/or the law at the time of implementation.

Actor	Action
	6:235, Access to Electronic Networks
	7:20, Harassment of Students Prohibited
	7:130, Student Rights and Responsibilities
	7:140, Search and Seizure
	7:150, Agency and Police Interviews
	7:170, Vandalism
	7:180, Prevention of and Response to Bullying, Intimidation, and Harassment
	7:185, Teen Dating Violence Prohibited
	7:190, Student Behavior
SVP Team, cont'd	7:200, Suspension Procedures
	7:210, Expulsion Procedures
	7:230, Misconduct by Students with Disabilities
	7:250, Student Support Services
	7:340, Student Records ⁵
	8:10, Connection with the Community
	8:95, Parental Involvement
	8:100, Relations with Other Organizations and Agencies
	Recommends, through the Superintendent, proposed policy changes to the Board for consideration. See Board policy 2:240, <i>Board Policy Development</i> .
	Recommends and procures resources for stakeholder training.
Building Principal	Ensures 4:170-AP1, Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response

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 addressed on p. 12-14.

⁵ Consult the board attorney for guidance about the application of State (III. 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 III. 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, 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 III. 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.

Actor	Action
	Plan (SEOCRP), is:
	Available throughout schools (do not limit to office);
	Distributed to and discussed with local law enforcement; and
	Regularly reviewed with building staff.
	Notifies and educates all staff, volunteers, and contractors of their duty to 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 violence.
	Notifies and educates staff, parents/guardians, students, and community members: (1) to report individuals and situations of concern to any school administrators or other authorities, i.e., local law enforcement, or the Safe2Help Illinois helpline (www.safe2helpil.com/) ⁶ , and (2) how school officials will address these concerns.
	Distributes Board policy 4:190, Targeted School Violence Prevention Program; 4:190-AP2, E6, Targeted School Violence Prevention and Threat Assessment Education; and 7:180-AP1, E2, Be a Hero by Reporting Bullying; and discusses what TATs are and what they do when they learn of threats and/or school violence. ⁷
,	Assesses the feasibility of forming a local anonymous tip line and organizing its management. Any locally operated school violence helpline must work in conjunction with Safe2Help Illinois as needed. 5 ILCS 860/10(d), added by P.A. 102-752.
	When a tip or concern is raised, ensures TATs are trained to

⁶ Research published by the American Academy of Pediatrics finds that firearm anonymous reporting systems in schools save lives. See French et al., *Firearm-Related Tips in a Statewide School Anonymous Reporting System*, Pediatrics, Volume 153, Issue 2 (published February 2024). Safe2Help Illinois is a confidential tipline that encourages, but does not require, reporters to provide their name and contact information. See www.safe2helpil.com/about-us/school-faq/.

⁷ 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.

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; 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
	engage in their work. See 4:190-AP2, Threat Assessment Team (TAT).
All District staff, volunteers, and contractors	Read 4:190-AP2, E6, Targeted School Violence Prevention and Threat Assessment Education.
	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.
	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 SEOCRP. See 4:170-AP1, Comprehensive Safety and Security Plan.
School Board	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> .
	Ensures that prior to the start of each school year, the Superintendent files 4:190-AP2, <i>Threat Assessment Team (TAT)</i> , and a list identifying the members of all TATs with: (1) a local law enforcement agency, and (2) the Regional Office of Education or Intermediate Service Center. 105 ILCS 128/45(b), amended by P.A.s 102-791 and 103-175.
	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 properly respond to individuals who provide them with information about a threat or school safety concern. ⁸
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 2:270, Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited, 7:20, Harassment of Students Prohibited, 7:180, Prevention of and Response to Bullying, Intimidation, and Harassment, and 7:190, Student Behavior. Ensures that staff responds to students who provide them with
	information about a threatening or concerning individual/situation.

⁸ 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.

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

Following is an extension of 4:170-AP1, 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 training related to each existing SEOCRP.

Actor	Action
Superintendent, Building Principal, and SVP Team	Examine 4:170-AP1, Comprehensive Safety and Security Plan, 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-AP1 Safety Team (see 4:170-AP1, Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities) might add to its procedures to accomplish a response and recovery.
	Adds an agenda item to the 4:170-AP1 Safety Team meetings specific to Targeted School Violence; considers inviting the Board Attorney and local law enforcement and emergency responders to this meeting.
	Note: 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 parents/guardians and the community during a crisis and to keep pace with social media information.
Superintendent and	For crisis preparedness and response, ensure that:
Building Principal(s)	4:170-AP1, Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCRP), reflects each individual building's needs.
	4:170-AP1, Comprehensive Safety and Security Plan, Part F, School Safety Drill Plan, supports a TSVP Plan.
	4:170-AP1, Comprehensive Safety and Security Plan, Parts G and H, 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.
	For crisis recovery, ensure that 4:170-AP1, Comprehensive Safety and Security Plan, Parts I, J, and K, reflects District needs and that the Board Attorney is aware of the plans.

Actor	Action
	Recommend to the District Safety Coordinator any other additional
	crisis recovery items that the 4:170-AP1 Safety Team deems necessary.

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
- U.S. Dept. of Education Readiness and Emergency Management for Schools Technical Assistance Center: https://rems.ed.gov/
- School Violence: Prevention, Centers for Disease Control and Prevention: https://www.cdc.gov/violenceprevention/youthviolence/schoolviolence/fastfact.html.
- School and Campus Health, Substance Abuse and Mental Health Services Administration: www.samhsa.gov/school-campus-health
- Suicide Prevention Resource Center: 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
- Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence, U.S. Secret Service (July 2018): https://www.secretservice.gov/press/releases/2018/07/ntac-enhancing-school-safety-using-threat-assessment-model
- A Study of the Pre-Attack Behaviors of Active Shooters in the United States Between 2000 and 2013, Federal Bureau of Investigation (June 2018): https://www.fbi.gov/file-repository/pre-attack-behaviors-of-active-shooters-in-us-2000-2013.pdf/view
- Call for Action to Prevent Gun Violence in the United States of America, Interdisciplinary Group on Preventing School and Community Violence (February 2018):

 https://education.virginia.edu/research-initiatives/research-centers-labs/research-labs/youth-violence-project/call-action-prevent-gun-violence-united-states-america
- 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
- 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): https://rems.ed.gov/docs/School Guide 508C.pdf
- School Connectedness: Strategies for Increasing Protective Factors Among Youth, Centers for Disease Control and Prevention (2009): https://stacks.cdc.gov/view/cdc/5767.
- 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
- Comprehensive School Threat Assessment Guidance, Cornell, D. (2018): www.schoolta.com/manual

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

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
- Ill. School and Campus Safety Resource Center: http://ilschoolsafety.org/
- III. Emergency Management Agency, Ready Illinois Schools/Campus Resources: https://ready.illinois.gov/plan/schools-resources.html
- Recommendations of the Illinois Terrorism Task Force School Safety Working Group (April 5, 2018): www.iasb.com/IASB/media/School-Safety/ITTFSchoolSafetyRecommendations.pdf
- Ill. Attorney General, Preventing Mass Shootings in Community Settings:

 https://illinoisattorneygeneral.gov/Safer-Communities/Violence-Prevention-and-Community-Safety/Preventing-Mass-Shootings
- Ill. Association of School Boards, School Safety and Security page: https://www.iasb.com/policy-services-and-school-law/guidance-and-resources/school-safety-and-security/

Safe 2 Help Illinois: www.safe2helpil.com/

School Climate Resources

National Center on Safe Supportive Learning Environments: https://safesupportivelearning.ed.gov/

World Health Organization Information Series on School Health's Document 10, Creating an Environment for Emotional and Social Well-Being: www.who.int/publications/i/item/creating-an-environment-for-emotional-and-social-well-being-an-important-responsibility-of-a-health-promoting-and-child-friendly-school

National School Climate Center: www.schoolclimate.org

Rachel's Challenge, programs for creating a school climate less susceptible to harassment, bullying, and violence: <u>rachelschallenge.org</u>

Sandy Hook Promise, gun violence prevention programs: https://www.sandyhookpromise.org/our-programs/program-overview/

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. 105 ILCS 128/45(a).

TATs function at the Building level, taking direction from the District-level School Violence Prevention Team. They identify, inquire, assess, and manage a range of threats that may be posed to the school community. Threats may be posed from a broad range of individuals affecting the District environment, including: ²

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

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

Pose a Threat – To pose a threat means an individual has, or is in the process of obtaining, the intent and capability to cause harm to self or others through planning and preparation.

Protective Factors – Characteristics or resources that make it less likely that an individual will engage in violence.

Risk Factors – Characteristics that make it more likely that an individual may engage in violence. Risk factors are usually stable over time.

¹ Required by 105 ILCS 128/45, amended by P.A.s 102-791 and 103-175. School districts had to implement a threat assessment procedure by 12-21-19 and establish a threat assessment team by 2-19-20. <u>Id</u>.

Adapted from *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Fifth Edition (July 2023), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-12 threat assessment management mppg mpd.pdf.

² See Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines, p. 2.

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 – A concerning communication or behavior that indicates that an individual may pose 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.

Threat Assessment – A systemic, fact-based process emphasizing an appraisal of observed (or reasonably observable) behaviors to identify potentially disruptive, dangerous, or violent 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 that, if available to serve, must include the following members: an administrator, a teacher, a school counselor, a school psychologist, a school social worker, and at least one law enforcement official. ³

TAT Triage Team — Consists of at least two members of the TAT designated by the Building Principal to triage reported cases of concerning, aberrant, or threatening behavior and/or communication. Considers the nature and level of concern of cases to determine if existing resources and mechanisms are sufficient to address concerns, or whether the full TAT should further assess and manage the situation, and initiates any crisis responses as appropriate.

Types of Threats -

Routine/No Known Concern: Subject/situation does not indicate a threat of violence or harm to self or others, or need for assistance or intervention. No impact on others, environmental factors, or precipitants that need TAT intervention. Close the case.

Low Level: Subject/situation does not indicate a threat of violence or harm to self or others; would or may benefit from intervention or assistance with concerns. Target, environmental/systemic, or precipitating events may be present at low levels. May involve some ongoing assessment management with passive monitoring and/or periodic active monitoring, and referrals as appropriate. Close the case if no team interventions or monitoring are indicated.

Moderate Level: Subject/situation does not pose a threat of serious violence or harm though risk cannot be ruled-out. Subject may be developing the capability for harm and is engaging in aberrant or concerning behaviors that indicate a need for assistance/intervention. Targets/others are likely concerned and impacted. Environmental/systemic or precipitating factors may be present. Consider law enforcement/security notification as appropriate. Requires ongoing assessment and management plan, active monitoring, and referrals as appropriate.

High Level: Subject/situation poses, or is rapidly developing the capability for, a threat of serious violence or harm to self or others; or is in urgent need of hospitalization or treatment. Targets/others are impacted. Typically involves environmental/systemic factors and consideration

³ 105 ILCS 128/45(a). Districts that are unable to establish a threat assessment team with school district staff and resources may use a regional behavioral threat assessment and intervention team that includes mental health professionals, a representative from the III. Law Enforcement Alarm System, a safety education officer from the III. State Police, and local law enforcement representatives. <u>Id</u>.

for precipitating events. Requires immediate notification of school administration and law enforcement, subject containment, target protection and safety plan, activation of crisis response protocols as appropriate, ongoing assessment and management plan, active monitoring, and referrals as appropriate.

Imminent: Subject/situation poses an imminent threat of serious violence or harm to self/others and has or may reasonably have significant impact on others. Requires immediate law enforcement and school administration notification, subject containment, target protection and safety planning, implementation of crisis response and notification protocols, ongoing assessment and management plan, and active monitoring.

Warning Signs – Characteristics or behaviors that are associated with a current or escalating risk of violence. These tend to be dynamic, acute, and often associated with new stresses, events, losses, or failures.

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. ⁴ Free statewide training is available through the III. School and Campus Safety Program, at: https://ready.illinois.gov/plan/schools.html .
	Prior to the start of each school year, files this procedure and a list identifying the members of all TATs with: (1) a local law enforcement agency, and (2) the Regional Office of Education or Intermediate Service Center, as applicable. 105 ILCS 128/45(b), amended by P.A.s 102-791 and 103-175. Informs the Board that this filing was completed.
Building Principal	Leads TAT.
	Selects TAT members with expertise in:
	School administration, e.g., a principal or other senior administrator from the school(s) covered by the TAT;
	Instruction, e.g., a teacher or administrator with instructional experience;
	Counseling, e.g., a school counselor, school psychologist or school social worker;
	Law enforcement, e.g., a school resource officer;
	Being a staff member in the building, e.g., school safety staff, human resources staff, special education staff, school nurse; and
	Other community resource persons (as members or consultants as determined by the TAT).
	When resources allow, selects designated back-up for each core TAT

⁴ 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
	member, from the same or similar areas of expertise, to fulfill their duties in the event of their absence or inability.
	Designates a TAT Triage Team.
	Ensures that any reporting mechanisms used by the school community are kept up to date, work consistently, and are checked on a regular and timely basis.
	Establishes an intake and triage process for reports regarding concerning, aberrant, or threatening behavior and/or communication.
	When a report is received, activates the TAT and uses this procedure.
TAT	Receives education and seeks training resources, including but not limited to 4:190-AP2, E1, <i>Principles of Threat Assessment</i> ; 4:190-AP2, E2, <i>Threat Assessment Documentation</i> ; 4:190-AP2, E3, <i>Threat Assessment Key Areas and Questions; Examples</i> ; 4:190-AP2, E4, <i>Responding to Types of Threats</i> ; and 4:190-AP2, E5, <i>Threat Assessment Case Management Strategies</i> .
	Receives initial and periodic refresher threat assessment training by a threat assessment expert.
	Commits to work collaboratively with each other, with other school staff, and (as appropriate) with community resources to support the purposes of the TAT and the safety of the school, its students, and its staff.
	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.
	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.
	Identifies and trains members of the school community who can take reports of possible threats.
	Effectively implements Board policy 4:190, Targeted School Violence Prevention Program.

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	
		_

Actor	Action
Building Principal and/or TAT Triage	When a potential threat report is received, initiates the following intake and triage process.
Team	<u>Intake</u>
	Obtains basic information about the potential threat, including but not limited to:
	Initial Report of Concern: Date/time reported, date/time reviewed, person receiving report.
	Reporting Party: Name, affiliation, contact information, relationship to subject of concern.
	Incident/Nature of Concern: Date/time occurred, location, nature of threat/concern, weapons involved/threatened, details about concerns, and any relevant background information.
	Subject of Concern: Name, affiliation, contact information, relationship to reporting party or target(s).
	Identified/Identifiable Target(s): Name, affiliation, contact information, relationship to report party or subject.
	Determines if an imminent threat exists. An imminent threat is indicated by such factors as:
	 Subject intends imminent and/or serious harm to self/others; or Subject lacks inhibitions for using violence.
	If an imminent threat exists, initiates School Emergency Operations and Crisis Response Plan (SEOCRP) and notifies law enforcement in accordance with 4:170-AP1, Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCRP).
	If no imminent threat exists, or once an imminent threat is contained, proceeds to triage.
	Triage
	Triages threat to determine if the full TAT must be involved. Triage may include, as necessary and appropriate:
	Reviewing the reported concerning, aberrant, or threatening behavior and/or communication.
	Reviewing school and other records for any prior history or interventions with the individual(s) involved.
	Conducting timely and thorough interviews of the person(s) who reported the threat, the recipient(s) or target(s) of the threat, other witnesses who have knowledge of the threat, and where reasonable, the individual(s) who allegedly engaged in the threatening behavior or communication. The purpose of the interviews is to gain a holistic understanding of the situation, determine the nature and level of the concerns, identify areas where more information may
	be needed, and inform appropriate strategies or interventions to

address any concerns identified.
Determines if the full TAT must be involved.
To determine that the full TAT does not need to be involved, all TAT Triage Team members must concur that there is no identifiable threat/concern, or that there is a low level of concern regarding issues that are being adequately addressed.
If the full TAT must be involved, convenes it as soon as possible.
Documents intake and triage using 4:190-AP2, E2, <i>Threat Assessment Documentation</i> .

Actor	Action	
TAT	Conducts a comprehensive and holistic assessment of the threat using the STEP framework set forth in 4:190-AP2, E1, <i>Principles of Threat Assessment</i> . See 4:190-AP2, E3, <i>Threat Assessment Key Areas and Questions; Examples</i> , for key questions to ask the person(s) who reported the threat, the threat recipient(s)/target(s), other witnesses, are the subject to assess the threat.	t
	Once the assessment is complete, classifies the threat as one of the following: Routine/No Known Concern, Low Level, Moderate Level, High Level, or Imminent.	,
	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: 5	
,	F Fair — sought to understand situations and gindividuals an opportunity to be heard and understood	
	O Objective — sought information based on facts a observations of the case and not speculation or bias;	ınd
	Reasonable – engaged in responses that were effects and proportionate to the situation; and	ive
	T Timely – quickly and responsively addressed reports threatening behavior.	of
Building Principal	Where the TAT classifies the threat as a Moderate, High, or Imminen level of concern and the threat requires further intervention to prevent violence or serious harm, notifies:	
	 The parent(s)/guardian(s) of any student who is the target/recipie of a threat; and The parent(s)/guardian(s) of any student who engaged threatening behaviors. 	ent in

Responding to and Managing Threats

Actor	Action
TAT	Identifies appropriate responses to the threat based upon its level. See 4:190-AP2, E4, <i>Responding to Types of Threats</i> , for examples of responses to each threat level.
	Develops, implements, and monitors an individualized, fact-based case management plan to intervene with, address, and reduce the threat by:
,	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

⁵ Source: © G. Deisinger (1996).

Actor	Action
	would be cause for reassessment and/or changes in interventions strategies;
	Assisting the subject, and any impacted staff or students, in accessing appropriate school and community-based resources for support and/or further intervention;
	Appointing one or more TAT members to engage directly with the subject to prevent the subject from becoming isolated; and
	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.
	Documents this process and any case updates using 4:190-AP2, E2, Threat Assessment Documentation.
	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.
	Maintains documentation in accordance with Board policy, State records laws, and administrative procedures.

Reporting Threats to Outside Agencies

The following is the process to notify the Local Law Enforcement Agency (LLEA) and/or the Ill. State Police (ISP) about certain types of threats. See also 4:170-AP1, *Comprehensive Safety and Security Plan, Part J, Required Notices*.

Actor	Action
Superintendent or designee	Reports batteries committed against teachers, teacher personnel, administrative personnel, or educator support personnel to: (1) the LLEA immediately after the occurrence of the attack, and (2) ISBE through its web-based School Incident Reporting System (SIRS) as they occur during the year and no later than August 1 for the preceding school year. 105 ILCS 5/10-21.7, amended by P.A. 102-894.
	Immediately notifies the LLEA upon receiving a report from any school personnel regarding a verified incident involving:
	A firearm in a school or on school-owned or leased property. 105 ILCS 5/10-27.1A(c), amended by P.A. 103-34.
	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 5/10-27.1B(b); 105 ILCS 127/).
Building Principal	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 illegal gang activity. 105 ILCS 5/10-21.4a.

Actor	Action
	Reports other threats to the LLEA as necessary and appropriate.
	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).
	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).
	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 III.Admin.Code §1230.120(b). See 3:60-E, Event Reporting and Notice Requirements for Building Principals Concerning School Safety and Security, for further information.

March 2024 4:190-AP2, E1

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 and management.

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. There is no one demographic profile of a perpetrator of targeted violence, nor is there a profile for the type of school that has been targeted.
- 2. In addition to students, others also engage in targeted violence in schools, including administrators, teachers, other staff, parents/guardians of students, contractors, people in relationships with staff or students, and even people with no connection with the school.
- 3. Incidents of targeted violence at school/workplaces are rarely sudden, impulsive acts. Perpetrators engage in a process of considering, planning, and preparing for acts of targeted violence.
- 4. Perpetrators usually have multiple motives to act violently, the most common involving an unresolved grievance with a peer.
- Many perpetrators of major acts of violence have experienced psychological, behavioral, or developmental symptoms, but may not have been diagnosed with a mental health condition or benefited from adequate treatment.
- 6. Many perpetrators of major violence impacting schools are suicidal in addition to their violent acts toward others.
- 7. Most individuals who perpetrate violence engage in multiple behaviors, prior to the incident, which cause others to have serious concerns about their behavior and/or well-being.
- 8. Many individuals who perpetrate violence have multiple stressors, including significant difficulties with losses or failures.
- 9. Many student perpetrators have been victims of, or participated in, prior bullying, which was often observed by others.
- 10. Most individuals who perpetrate violence do not threaten their targets directly prior to engaging in violence, though many express their grievances and aspects of their thoughts or plans to others, often through social media or online activities.
- 11. Prior to most incidents of targeted violence, other people know about aspects of the individual's ideas, plans or preparations to cause harm.
- 12. Many bystanders who have knowledge of concerning behaviors do not report them.
- 13. While most perpetrators act alone, in many cases, others, e.g., staff, students, peers, family members, etc., are involved in some way, such as failing to report concerns (or take other

The footnotes should be removed before the material is used.

4:190-AP2, E1

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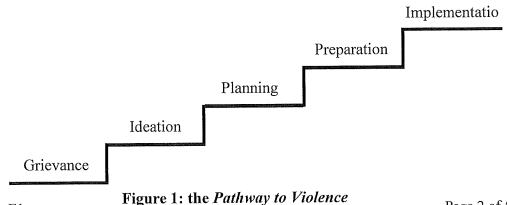
¹ Adapted from *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Fifth Edition (July 2023), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-12 threat assessment management mppg mpd.pdf.

steps) to prevent violence, encouraging violence, and even helping with plans or preparation for violence.

The Pathway to Violence

Individuals who committed targeted violence rarely "just snapped," but engaged in a process of thought and behavior that escalated over days, weeks, months, and even years. A graphic representation of this process, the *Pathway to Violence*, is shown in Figure 1. As with any model, the Pathway reflects a general process for understanding intentional actions. For a given person, the process is not necessarily linear, but may ebb and flow in the rate and direction of movement and cycle between phases of the process. As the subject exerts or demonstrates increased "intensity of effort" around the ideation, planning and preparation, e.g., more attention, time, energy, resources, etc., there is greater risk for harm, and likely a greater impact on others. The steps along the Pathway include:

- **Grievance** A real or perceived sense of loss, mistreatment, or injustice, often fueling a feeling of being wronged. Most people will experience grievances through life and the vast majority do not engage in acts of violence. However, for those who do engage in targeted violence, grievances (or other motivations) are common precursors.
- Ideation Expressing thoughts or fantasies regarding the use of violence to address a real or perceived grievance. Note that many people have occasional or fleeting thoughts of violence in response to perceived grievances, yet most do not act on them or move forward along the Pathway. Knowledge that someone is thinking about violence does not confirm that a danger exists but should raise the possibility that the subject is struggling with a grievance.
- Planning Giving thought and consideration not only to the idea of violence, but also to the who, what, when, where, and how of doing so. Expressions may begin to reference timing, location, targets, means, methods, etc. The subject may seek out and gather information regarding their plan and other incidents of targeted violence to learn from other perpetrators.
- Preparation Beyond just having or acquiring weapons, this stage involves attempts to prepare for the violence and to develop or acquire the capability to cause harm to the intended target(s). Subjects try to obtain the means to fulfill their plans, which may be weapons, tools, and clothing to match their fantasies. Subjects may seek or take advantage of opportunities and circumstances that support their plans. Subjects may conduct surveillance or probe boundaries or security systems to see if they can assess areas where they do not belong or get close to people in ways that are inappropriate or atypical.
- Implementation The subject initiates the operationalized plan once reaching a point where they perceive themselves as capable of doing so. Capability is based on the subject's perceived skill to cause harm and their will to do so.



4:190-AP2, E1

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As a subject moves to the right along the pathway, there is often an escalation in the rate of movement (i.e., a flurry of activity or energy burst), or changes in the frequency of behaviors causing concern (e.g., a number of concerns over time), or a sudden change in their patterns of behavior. Where a subject has caused numerous concerns over time and then suddenly there is no more information about concerns regarding the subject (i.e., they "go off the radar"), the TAT should check whether the concerning behavior has stopped, the subject has become more covert in their actions, or community members have stopped reporting concerns.

Research indicates that while targeted violence incidents are rarely spontaneous and impulsive, they can escalate rapidly from ideation through implementation. That is, the time span between the subject's decision to cause harm and the actual incident may be short. This may be expedited by a sense of desperation for resolution, lack of concern for consequences, or the influences of others encouraging escalation (e.g., through social media or direct communications). Consequently, when there are indications that a subject may pose a threat to the school community, threat assessment teams will need to move quickly to inquire about and intervene in that planning or preparation.

The steps along this pathway indicate opportunities to observe, identify and intervene with threatening and/or aberrant behaviors that cause concern for violence by, or the well-being of, the individual. Frequently, information about an individual's ideas, plans and preparations for violence can be observed before violence can occur. 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.

Guiding Principles

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.

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 and management:

- 1. 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. The threat assessment process examines the behavior of the subject in relation to the context, issues, challenges, and resources involved. This provides for an individualized, holistic, and contextually based assessment of and response to the situation.
- 2. Targeted violence is the result of an understandable, and usually discernable, process of thinking and behavior. This is often referred to as the *Pathway to Violence*, discussed above.

- 3. Violence stems from an interaction among the <u>Subject(s)</u>, <u>Target(s)</u>, <u>Environment/Systems</u>, and <u>Precipitating Incidents (STEP).² Identifying</u>, assessing, and managing potential acts of violence or other harm requires a comprehensive and holistic perspective of the situation involving the following key domains and their interaction:
 - a. S Is the **Subject** engaging in behavior(s) that may pose a threat of violence or harm to self or others, or significant disruption, or otherwise indicate a need for assistance or intervention?
 - b. T Are Targets/others vulnerable to harm, in need of or protective actions, impacted by the situation, or otherwise indicate a need for assistance or intervention?
 - c. \mathbf{E} Are there **Environmental**/systemic issues contributing to or impacting upon the situation?
 - d. P Are there reasonably foreseeable **Precipitating events** that may impact the situation?
 - e. **PLUS** Are there actions the threat assessment team can facilitate (to address any concerns noted), beyond those already being effectively done?
- 4. **Violence is a dynamic process.** No one is either always dangerous or never dangerous. The level of concern depends on the totality of the situation. An assessment is only as good as the quality of information on which it was based at the time that it was made. Threat assessment and management involves ongoing review, re-assessment, and modification of intervention strategies through the point at which the case is adequately resolved.
- 5. Threat assessment is about prevention, not prediction. TATs do not try to predict whether an individual is a violent person. Instead, TATs try to determine under what circumstances an individual might become violent or engage in other harmful or significantly disruptive behaviors, what the impact of the situation is upon others (even when an individual poses no identifiable threat), what environmental/systemic factors may be contributing to the situation, and whether there are any precipitating events on the foreseeable horizon.
- 6. Social media and online activity are critical considerations in many cases. Individuals of concern, and those concerned about them, often use social media to express such concerns. For those who may pose a threat, their expression of grievances, violent intent, planning, and preparation can often be observed in online activities.
- 7. A 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 serious targeted violence in schools and workplaces has found that few perpetrators directly communicated a threat to their target before the violence. In most 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 or danger to self or others.
- 8. The relationship between mental illness and violence is complex. Most people living with mental illness will not be violent toward others. Most people who are violent are not mentally ill. The presence of serious mental illness increases general risk of violence, but it is not the major factor that it is perceived to be and is almost never the sole or primary explanation for a violent act. Other risk factors, e.g., having a history of violence, childhood exposure to

² Source: Deisinger (1996); Deisinger & Nolan (2020).

violence, or substance abuse or dependence, have more significant correlations with violence overall. When considering targeted violence, substantially higher rates of severe mental illness have been observed among adult mass murderers, public figure attackers, and lone actor terrorists than in the general population. However, even for many of these, having a mental illness was less of a factor for violence risk than was the cessation or lack of adequate treatment for the illness. For threat assessors dealing with a subject of concern, the symptoms and behaviors associated with the subject's mental illness (versus the diagnosis) can be significant factors impacting a case.

- 9. An inquisitive, objective, and diligent mindset is critical to successful threat assessment and management. Those who carry out threat assessments must strive to be thorough, diligent, 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. One hallmark of a good inquiry or investigation is corroboration or fact-checking. Where possible, it is important to see where information from one source is confirmed by (or with) information from another source.
- 10. A collaborative and coordinated approach between systems within the school and community are critical for an effective threat assessment and management process. Effective working relationships and collaborations with services and programs both within the school, e.g., school psychologist, school social worker, school counselor, school-based mental health clinicians, administrators, disciplinary officers, human resources, etc., and the broader 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*.
- 11. Essential elements of an effective threat assessment and management process. Research and practice have shown that, to establish and sustain an effective behavioral threat assessment and management process, organizations must have a systemic process that:
 - a. Utilizes an effective and relevant multi-disciplinary approach that enhances the team's ability to address all threats;
 - b. Enables community engagement and centralized awareness of developing concerns through an active outreach program;
 - c. Conducts a thorough holistic and contextual assessment of the situation (e.g., using the STEP framework);
 - d. Implements proactive and integrated case management strategies (e.g., using the STEP framework);
 - e. Monitors and re-assesses cases on a longitudinal basis;
 - f. Conducts all practices in accordance with relevant laws, policies, and standards of practice; and
 - g. Sustains a focus on continuous improvement of the process and adapts to challenges and changing needs.

March 2024 4:190-AP2, E2

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 and Management Form* (Form) containing six parts, on pages 114-126 in a publication entitled *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Fifth Edition (July 2023), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services at: www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-12 threat assessment management mppg mpd.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*.

March 2024 4:190-AP2, E3

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 assessment. 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.

Interview with threat recipient(s)/target(s) and witness(es): Interview, when possible, all persons who witnessed the reported and/or concerning behavior, including the subject and all recipients/targets. Inform the interviewee that the primary purpose of the interview is to gather information about a possible situation of concern with the goals of preventing harm to staff or students, and providing assistance to those involved.

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

Because the process facilitates increased and revised understanding of issues over time, always review new information and re-evaluate the threat accordingly. Maintain contact with the target to obtain information about any further behaviors of concern, improvements to the situation, or other relevant developments.

Review records and consult with staff who know the subject: Background information may assist the TAT's 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 the TAT judge whether the subject is forthcoming and straightforward. Areas that may contain helpful background information include:

- 1. Recent (and perhaps historical) work or school performance history
- 2. Disciplinary or personnel actions
- 3. Prior TAT contacts
- 4. Law enforcement or security contacts at school and in the community
- 5. Prior critical involvement with mental health or social services

The footnotes should be removed before the material is used.

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¹ Adapted from *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Fifth Edition (July 2023), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-12 threat_assessment_management_mppg_mpd.pdf.

- 6. Presence of problems in the subject's life
- 7. Current or historical grievances that may be related to the behavior of concern
- 8. Online searches: Internet, social media, email, etc.

Interview with the subject of concern: Directly ask a subject who is a staff member or student about his/her actions and intentions. Many subjects will respond forthrightly to direct questions when they are asked in a non-judgmental manner. This interview could elicit important information that permits the TAT to understand a subject's situation and identify possible targets, which can assist the assessment of the risk of violence. More leads for further inquiry 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/empathy where appropriate; 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 problems or with specific people.

Although interviewing a subject might provide valuable information, relying too heavily on that interview to make judgments about whether the subject poses a threat is likely to present problems. Information offered by the subject may be incomplete, misleading, or inaccurate; and seeking corroboration and verifying information learned during the interview is 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? Note: this is not intended as an exhaustive or complete list of areas of inquiry, but as core areas that support assessment and understanding of the situation, the nature and severity of any risk, and that may guide TAT interventions. Additional questions may be asked for clarification and/or to probe more deeply to fully understand the situation.

Questions Regarding the Subject of Concern

Inquiry regarding a subject of concern seeks information regarding the nature and severity of concerns, whether the subject may pose a threat of violence or other harm to self or others; or is otherwise in need of assistance or intervention. The inquiry considers all sources of information that may be relevant to gaining as comprehensive an understanding of the subject and their concerns, as circumstance may allow. Consider the presence of risk and protective factors, warning signs, coping skills and support systems that may be relevant to the case.

1. What behaviors are causing concern for or about the subject?

Does the situation or circumstance that led to these statements or actions still exist?

When, where, and in what circumstances do the behaviors tend to occur?

Is there a pattern to the behaviors or a change in pattern of behavior that is causing concern?

If the behaviors have occurred previously, how has the subject dealt with the grievances? What kept them from acting violently?

Has the subject previously come to someone's attention or raised concern in a way that suggested the subject needs intervention or supportive services?

Are the subject's behaviors causing others concern for the welfare of the subject or others?

2. Have there been any concerning, aberrant, threatening, or violent communications?

Were there *directly communicated threats* (threats made directly) to targets or sources of grievances?

Has there been *leakage* (communications to third parties about grievances, ideation, or intent to use violence, planning, or preparation?)

How, e.g., in person, letter, email, diary/journal, social media, website, etc., and to whom, e.g., targets, peers, others, is the subject communicating?

What is the *intensity of effort* (frequency and duration of contact, multiple measures used, multiple recipients or targets of communication) in communications or attempts to address grievance?

Do the subject's communications provide insight about motives/grievances, ideation, planning, preparation, timing, targets, etc.?

Has anyone been alerted or warned away?

3. What are the subject's motives and goals?

Does the subject have a major grievance or grudge?

Against whom? What is the relationship between the subject and any identifiable targets?

Are there other motives that support the use of violence, such as a desire for notoriety/fame?

What does the subject seem to want to achieve with the behavior?

Does the subject seem fixated on the grievance, target, or need for justice through violence? *Fixation* may be exhibited through increasing perseveration on person or cause or need for resolution; increasingly strident opinion and negative characterization of target; impact on family and other associates of subject, if present and aware; and/or angry emotional undertone, accompanied by social or occupational deterioration.

What efforts have been made to resolve the problem and what has been the result?

4. Has the subject shown any inappropriate interest in, fascination, or identification with other incidents or perpetrators of targeted violence (e.g., school/workplace attacks, mass murderers, terrorism, weapons, etc.)?

Do they exhibit a heightened interest, fascination, obsession, or fixation with acts of violence?

Do they immerse themselves in exposure to violence through movies, videos, books, video games, social media, etc., to the detriment of other life activities or in ways that negatively impact others?

Identification - a strong desire or need to emulate or be like others - may be with the perpetrators of targeted violence or powerful figures; grievances of other perpetrators; weapons or tactics of other perpetrators; effect or notoriety of other perpetrators; and/or ideologies or groups that support and encourage the use of violence to address grievances.

5. Does the subject have, or are they developing, the capacity to carry out an act of targeted violence?

Are there *Pathway to Violence* (see 4:190-AP2, E1, *Principles of Threat Assessment*) warning behaviors?

Where is the subject along the Pathway? How quickly are they moving?

Are there changes in activity levels or rate of movement or *energy bursts* (flurries of or changes in frequency/variety of activity)? Do certain circumstances or events tend to impact their movement?

Is the subject's thinking and behavior organized sufficiently to engage in planning and preparation?

Is there a history of violence that speaks to capacity or potential targets?

Are there aspects of *novel aggression* (testing limits/boundaries or atypical aggression) when there is no history of violence?

6. Is the subject experiencing hopelessness, desperation, and/or despair?

Has the subject experienced a recent perceived loss, failure, or injustice?

Do they experience shame or humiliation related to the loss, failure, or injustice?

Is the subject having significant difficulty coping with a stressful event? Are there multiple stressors?

Are there indications of *last resort behaviors* (increasing desperation or distress, pressing subject into violence as a position of last resort)?

Has the subject engaged in behavior that suggests they have considered ending their life?

7. Has the subject's behavior indicated or raised concern of need for intervention or supportive services?

Does the subject have difficulty coping?

Are there symptoms of severe, acute, or untreated mental illness, such as:

Significant lack of contact with reality (hallucinations, delusions, or extreme wariness, distrust, or paranoia)

Symptoms that impact the subject's perception of grievances or how others respond to subject Significant or sustained agitation or anxiousness

Significant or sustained depressed mood

Alcohol or other drug use/abuse

Pervasive patterns of maladaptive behavior

Does the subject have access to treatment resources? If so, are they actively engaged in those services and compliant with the treatment plan and/or prescriptions?

8. Does the subject have protective factors, stabilizers, or buffers that inhibit use of violence?

Several factors may decrease risk or inhibit escalation to violence. Check for these protective factors to see if they are present and stable, absent, or diminishing, or need to be bolstered:

Views violence as unacceptable, immoral

Accepts responsibility for actions

Demonstrates remorse for inappropriate behavior

Respects reasonable limits and expectations

Uses socially sanctioned means of addressing grievances

Values life, job, relationships, freedom

Fears loss of reputation, job, freedom, life

Maintains, uses, and builds effective coping skills

Treatment access, compliance, and engagement

Sustains trusted and valued relationships/support systems

A sustained, trusting, and valued relationship with at least one responsible person can be a key stabilizer and inhibitor to violence. That person can provide support, challenge distorted perceptions or violent ideation and help connect the subject with support. Consider:

Does the subject have at least a friend, colleague, family member, or other person that they trust 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? Does that other person have skill and willingness to monitor, intervene, and support the subject?

Is the subject emotionally connected to and engaged with other people?

Is there a deterioration of support, increased withdrawal, or isolation from, or alienation by prior support systems?

Questions Regarding Potential Targets

Targets (and others impacted by the subject's behavior) may behave or respond in ways that indicate the level of threat they perceive, that increase their vulnerability or diminish their ability to protect themselves, or that reflect needs for assistance or support.

Are targets (or others) indicating vulnerability or concern about, or impact by, the subject's behavior?

Are those who know the subject concerned that he or she might act based on violent ideas or plans?

Are those who know the subject concerned about a specific target?

Are they concerned for the well-being of the subject?

Are targets or others around the subject engaging in protective actions, e.g. distancing, avoiding, minimizing conflict, modifying routines or behaviors, etc., even if they do not define the subject as a threat.

Are targets engaging in behavior or in situations that increase their:

Desirability: A source of the subject's grievances or fuel fantasies for violence.

Availability: The proximity or access between the subject and the target.

Vulnerability: Lack of protective factors or behaviors or coping abilities of the target.

Do targets have adequate coping and support resources?

Are targets or others experiencing stress, trauma, or other symptoms that may benefit from intervention?

Questions Regarding Environmental/Systemic Factors Impacting the Situation

These factors impact or stem from the school/workplace/family environment or systemic issues or challenges that may allow, encourage (or not discourage), or exacerbate the use of violence to address concerns, may inhibit reporting of concerns, or that may impact ability to effectively resolve concerns.

Are there environmental/systemic factors that are impacting the situation?

Systemic, policy, or procedural problems?

Unfair, inconsistent, or biased disciplinary processes?

Silos, gaps, or delays in reporting of concerns?

Poor conflict management skills?

Poor supervisory skills and/or willingness to address?

Inadequate resources to address needs?

School/family/social climate concerns, e.g., harassment, bullying, bias, neglect, or abuse?

Lack of support or treatment resources in the community?

Social influences of others in the environment?

Questions Regarding Precipitating Events

Violence risk is dynamic and situational. It is important to consider not just the current situation involving the subject, target and environment/systems, but also those that may change in the near to mid-term, and whether those changes could make things better or worse for the case.

Are there Precipitating Events that may impact the situation currently and in the foreseeable future?

Common precipitants are related to loss, failures, or injustices, as well as events or circumstances that trigger memories of past grievances, or situations that create unexpected opportunities to act.

Questions Regarding the Integrity of the Threat Assessment Process

What is the consistency, credibility, and completeness of information about the situation?

Are the subject's conversation and story consistent with his or her actions?

Do collateral sources confirm or dispute what the subject says is going on and how they are dealing with it?

Are there multiple sources? If so, are they providing consistent information?

What gaps exist in understanding the situation? What don't we know?

What bias or misperceptions may be influencing witnesses, targets, TAT members? Consider sources of bias/distortion in our thought processes, including but not limited to:

Confirmation Bias: Seeking and integrating information that supports/affirms our prior beliefs Anchoring: Base final judgment on information gained early on – first impressions may bias future perspectives.

Over-Confidence: Failure to spot limits of knowledge and therefore perceive less risk. Too much faith in ability.

In-Group Bias: Overestimate abilities, value, and credibility of people we know (or are similar to) more than people we do not know or who are different.

Availability: Overestimate likelihood of events that have greater availability in memory due to being unusual, recent, or emotionally salient.

Probability Neglect: Overestimate risks of harmless or low probability events, while underestimate risks of high probability events even when they are not harmless (1/84 chance of dying in vehicle accident vs 1/5,000+ of dying in plane crash).

Fundamental Attribution Error: Place blame for own bad outcomes on external events. When others have bad outcomes, make judgements about them – failure to account for interactions between the person and the situation.

Hindsight Bias: Overestimate predictability of past events based on current knowledge of facts and outcome.

March 2024 4:190-AP2, E4

Operational Services

Exhibit - Responding to Types of Threats 1

After a threat is assessed, use this exhibit with subhead **Responding to and Managing Threats** in 4:190-AP2, *Threat Assessment Team (TAT)*. It provides examples of possible responses for TATs to consider and is not intended as an exhaustive or complete list.

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-Level Threat Responses.

Low-Level Threat Responses

Resolve a low-level 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-Level Threat Responses

Resolve a moderate-level 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.

¹ 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: https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf. Note: subsequent editions of this publication have been issued but they do not contain examples of threat responses by level of 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.
- 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-Level Threat Responses

Resolve a high-level 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).

March 2024 4:190-AP2, E5

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 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/systemic, and monitoring for the impact of precipitating events on case management. 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, assist, refer, correct, contain, or control the **Subject** who may pose a threat of violence, harm, or significant disruption to self or others; or otherwise indicate a need for assistance or intervention;
- T Decrease vulnerabilities, provide support and assistance for the **Target**/others impacted or otherwise indicating a need for assistance or intervention;
- E Address Environmental/systemic issues to minimize impact, escalation, or recurrence;
- P Prepare for and mitigate against Precipitating events that may impact the situation; and
- **PLUS** Are there any actions the TAT can or should facilitate to address any concerns noted, beyond those already being effectively done?

Subject-Based Case Management Strategies

Schools regularly use many of the following examples of interventions or strategies to address situations involving concerning, aberrant or threatening behavior. TATs should consider a broad range of interventions that may de-escalate, assist, refer, contain, control or 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. Check-in/check-out to 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

Adapted from *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Fifth Edition (July 2023), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-12 threat assessment management mppg mpd.pdf.

² Source: Deisinger (1996); Deisinger & Nolan (2020).

- 3. Parent/family involvement
- 4. Referral for assistance or support services, such as:
 - a. Academic/work assistance
 - b. Special education IEP or Section 504 accommodations
 - c. Alternative schooling/work
 - d. Social skills training
 - e. Conflict resolution training/anger management
 - f. Behavioral contracting
 - g. Modification of classroom assignment or work schedule
 - h. Involvement in extracurricular activities
 - i. Performance improvement plans
 - j. Peer coaching/mentoring
- 5. Welfare/well-being checks
- 6. Counseling/mental health services, such as:
 - a. Check-in/check-out with school counseling staff
 - b. Ongoing support with school counseling staff
 - c. Outpatient counseling/mental health care
 - d. Emergency psychiatric evaluation
- 7. Independent medical/psychological evaluations, such as:
 - a. Clinical violence risk and direct threat evaluation
 - b. Fitness for duty evaluation
- 8. Referral for disciplinary measures, such as:
 - a. Subject confrontation or warning
 - b. Administrative orders for no contact or communication
 - c. Detention
 - d. Suspension
 - e. Termination/expulsion
- 9. Referral/notification to law enforcement or criminal justice system
 - a. Law enforcement/juvenile justice involvement
 - b. Court-issued protective orders
 - c. 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, 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 identified or identifiable targets and seek to maintain contact with targets (where appropriate) to help monitor the actions and impact of the subject of concern. Examples of target-based case management strategies include, but are not limited to:

- 1. Strategies for Targets
 - a. Set clear limits and boundaries with the subject regarding communications and contact.
 - b. Document all contacts with the subject using a log noting the date/time/means of contact, nature of contact, witnesses, and impact on the target.
 - c. Monitor communications for changes/escalations by the subject.
 - d. Avoid contact with or response to the subject do not reinforce the subject's attempts to get a response.
 - e. Minimize reactivity to the subject's actions.
 - f. Minimize publicly available information especially with social media and phone, e.g., by scrubbing Internet information, checking privacy settings on social media applications.
 - g. Maintain/enhance situational awareness.
 - h. Vary routine be careful about consistent habits.
 - i. Develop contingency plans for avoidance or escape from the subject, shelter, situational awareness, and personal safety.
 - i. Use support systems being/feeling like a target can be stressful.
- 2. Organizational Strategies for Reducing Target Vulnerability
 - a. Engage/liaise with target assign a team member as a point of contact for support and assistance.
 - b. Change work/class schedule (hours and/or location).
 - c. Change/enhance security in work/class location.
 - d. Notify staff who can help monitor if the subject is present or posing a threat to target.
 - e. Security staffing
 - f. Safety escorts
 - g. Fear management
 - h. Counseling/employee assistance program referrals

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.
- 2. Address reporting gaps/delays.
- 3. Intervene with associates that support violent behavior.
- 4. Enhance conflict management skills of groups.
- 5. Bullying prevention/intervention programs

- 6. Enhance supervisory skills and accountability.
- 7. Enhance school/workplace climate by building a safe, caring, and connected community. TATs work best in schools that have an overall safe climate, where students and employees feel respected and feel that situations are handled fairly. Connection through human relationships is a central component of a culture of safety and respect. The principle objective of school violence-reduction strategies is to create cultures and climates of safety, respect, and emotional support within the school. Strategies to support and enhance a positive school/workplace climate include, but are not limited to:
 - a. Effective communication among and between school staff, students, and parents/guardians.
 - b. School climate assessments and intervention with identified issues.
 - c. Emphasis on school connectedness.
 - d. Strong but caring stance against a code of silence.
 - e. Bullying/harassment prevention and intervention.
 - f. School-law enforcement partnerships, including well-trained school resource officers.
 - g. Collaborative relationships with mental health, social services, and other community-based resources.
 - h. Planning and preparation to deal with, respond to, and recover from potential crises.
 - i. Physical security and crime prevention through environmental design.

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 maintain an ongoing, longitudinal approach to anticipating, monitoring for, and (to the extent possible) managing the impact of potential precipitating events such as:

- 1. Minimize unnecessary precipitants where possible (look to systemic issues that unnecessarily impact cases).
- 2. Consider the impact of the timing and location of interviews.
- 3. Monitor and plan for loss/injustice impacting the subject, e.g., job or income, status, relationship, health, rejection/ostracization, etc.
- 4. Monitor and plan for key dates/events in the process of case management, such as:
 - a. Anniversaries, e.g., date of beginning of relationship, date of end of relationship, date served with court orders/separation documents, birthdays, holidays, etc.
 - b. Hearings
 - c. Court dates
 - d. Service of notice about outcomes
- 5. Monitor for reactions to administrative/court actions.
- 6. Monitor for reactions to case management/interventions.
- 7. Monitor for contagion effect of other high profile or locally significant acts of violence.

Operational Services

Exhibit - Targeted School Violence Prevention and Threat Assessment Education

On District letterhead

Date:

To: District Staff and Parents/Guardians

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 may pose 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 behaviorally, 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 "joking," 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

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 concerning, aberrant, threatening, and prohibited behaviors to be reported. While there is no one list of behaviors that may cause concern, examples include, but are not limited to:

- Threatening statements or gestures
- Persons with ongoing, unresolved grievances with members of the school community
- Atypical, unusual, or bizarre communications or behavior
- Significant changes in behavior
- Increased focus or fixation on aspects of violence, harm, or death
- Information about someone expressing thoughts, plans, or preparations for violence
- Concerns that someone may harm themselves
- Behavior that significantly disrupts the learning or working environment
- Behavior that seems troubling or disturbing
- Persons seeming isolated and alienated from others
- Anyone unknown to the school

Staff and parents/guardians can reinforce this guidance by discussing with students what a threat is, encouraging students not to make threats or "joking" statements in the first place, and reiterating that seeking help to prevent someone from getting hurt or hurting another by reporting threats is appropriate.