

4. Sticking to the facts during discussions.
5. Deferring all media requests to the spokesperson.
6. Comforting and supporting each other.

#### J. Required Notices

A school staff member shall immediately notify the Building Principal when he or she:

1. Observes any person in possession of a firearm on or around school grounds; however, such action may be delayed if immediate notice would endanger students under his or her supervision. 105 ILCS 5/10-27.1A(a).
2. Has reason to suspect that any person on school grounds is or was involved in a drug-related incident. 105 ILCS 5/10-27.1B.
3. Observes an attack on any staff member or is subject to an attack. 105 ILCS 5/10-21.7, amended by P.A. 102-894.

Upon receiving a report of No. 1, above, the Building Principal or designee shall immediately notify local law enforcement. In addition, upon receiving a report on any of the above Nos. 1-3, the Building Principal or designee must notify the Superintendent or designee. See 3:60-E, *Event Reporting and Notice Requirements for Building Principals Concerning School Safety and Security*.

Upon receiving a report of Nos. 1-3, above, the Superintendent or designee shall immediately notify local law enforcement. The Superintendent will also report incidents involving attacks on staff members to 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. SIRS is available at [www.isbe.net/Pages/School-Incident-Reporting-System.aspx](http://www.isbe.net/Pages/School-Incident-Reporting-System.aspx) or by going to ISBE's home page and accessing the District's Web Application Security (IWAS) account.

#### K. Resources

Guide for Developing High-Quality School Emergency Operations Plans: At a Glance  
[www.rems.ed.gov/K12GuideForDevelHQSchool.aspx](http://www.rems.ed.gov/K12GuideForDevelHQSchool.aspx)

Guide for Developing High-Quality School Emergency Operations Plans  
[www.rems.ed.gov/docs/REMS\\_K-12\\_Guide\\_508.pdf](http://www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf)

The Role of Districts in Developing High-Quality School Emergency Operations Plans: A Companion to the School Guide [https://rems.ed.gov/docs/District\\_Guide\\_508C.pdf](https://rems.ed.gov/docs/District_Guide_508C.pdf)

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center Tool Box [www.rems.ed.gov/toolbox.aspx](http://www.rems.ed.gov/toolbox.aspx)

ALICE (Alert, Lockdown, Inform, Counter, Evacuate) Training Institute [www.alicetraining.com](http://www.alicetraining.com)

ISBE/OSFM All Hazard Preparedness Guide for Illinois Schools [www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx](http://www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx)

Illinois Emergency Management Agency (IEMA) [www2.illinois.gov/ready/Pages/default.aspx](http://www2.illinois.gov/ready/Pages/default.aspx)

Schools/Campus—Resources, including School Safety Information Sharing  
[www2.illinois.gov/ready/plan/Pages/Schools.aspx](http://www2.illinois.gov/ready/plan/Pages/Schools.aspx)

Safe2Help Illinois, designed to offer students a safe, confidential way in which to share information that might help prevent suicides, bullying, school violence, or other threats to school safety, [www.safe2helpil.com/](http://www.safe2helpil.com/)

Illinois Terrorism Task Force (ITTF) [www2.illinois.gov/iema/ITTF/Pages/default.aspx](http://www2.illinois.gov/iema/ITTF/Pages/default.aspx)

National Association of School Psychologists (NASP) - Recommendations for Comprehensive School Safety and Crisis Policies [www.nasponline.org/resources-and-publications/resources/school-safety-and-crisis](http://www.nasponline.org/resources-and-publications/resources/school-safety-and-crisis)

U.S. Secret Service (USSS) National Threat Assessment Center  
[www.secretservice.gov/protection/ntac](http://www.secretservice.gov/protection/ntac)

Bomb Threat Response Planning Tool, developed by the U.S. Dept. of Justice's Bureau of Alcohol, Tobacco, Firearms and Explosives and the U.S. Dept. of Education's Office of Safe and Drug Free Schools [www.threatplan.org/default.htm](http://www.threatplan.org/default.htm)

School Crisis Guide - Help and Healing in a Time of Crisis, published by NEA Health Information Network [www.nea.org/resource-library/neas-school-crisis-guide](http://www.nea.org/resource-library/neas-school-crisis-guide)

## Attachment A

### School Emergency Operations and Crisis Response Plan Format

#### Basic Plan

- |  |  |
|--|--|
| 1. Introductory Material                               | 3. Concept of Operations                               |
| 1.1 Promulgation Document and Signatures               | 4. Organization and Assignment of Responsibilities     |
| 1.2 Approval and Implementation                        | 5. Direction, Control, and Coordination                |
| 1.3 Record of Changes                                  | 6. Information Collection, Analysis, and Dissemination |
| 1.4 Record of Distribution                             | 7. Training and Exercises                              |
| 1.5 Table of Contents                                  | 8. Administration, Finance, and Logistics              |
| 2. Purpose, Scope, Situation Overview, and Assumptions | 9. Plan Development and Maintenance                    |
| 2.1 Purpose  | 10. Authorities and References                         |
| 2.2 Scope  |  |
| 2.3 Situation Overview                                 |  |
| 2.4 Planning Assumptions                               |  |

#### Functional Annexes

**Note:** This is not a complete list, but it is recommended that all SEOCRPs include at least the following functional annexes:

- |                               |                                    |
|-------------------------------|------------------------------------|
| 1. Communications             | 6. Reunification                   |
| 2. Evacuation                 | 7. Continuity of Operations (COOP) |
| 3. Shelter-in-Place           | 8. Security                        |
| 4. Lockdown                   | 9. Recovery                        |
| 5. Accounting for All Persons | 10. Health and Medical             |

#### Threat- or Hazard-Specific Annexes

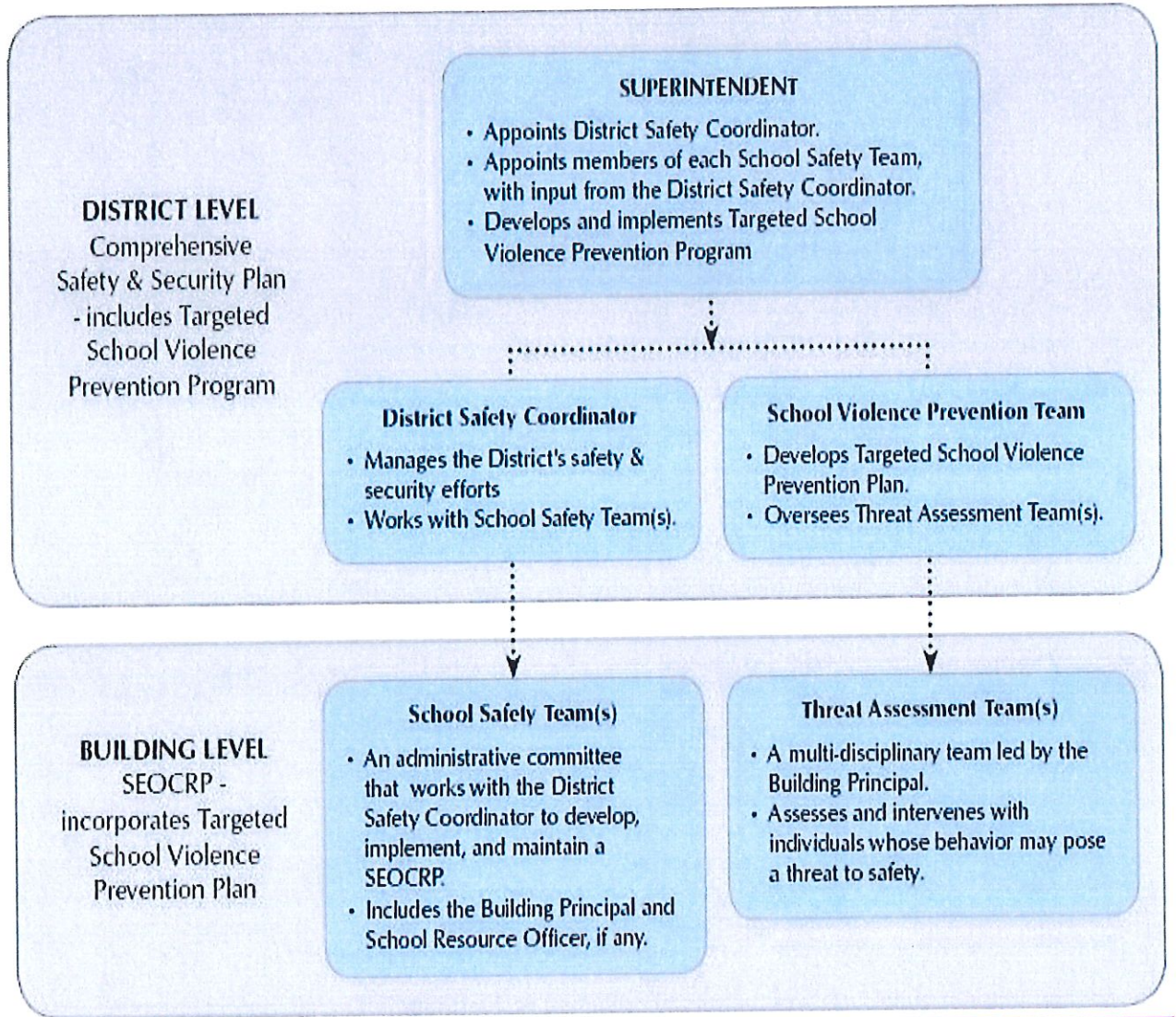
**Note:** This is not a complete list. Each school's annexes will vary based on its hazard analysis.

- |                                 |                                 |
|---------------------------------|---------------------------------|
| 1. Hurricane or Severe Storm    | 5. Mass Casualty Incident       |
| 2. Earthquake                   | 6. Active Shooter               |
| 3. Tornado                      | 7. Pandemic or Disease Outbreak |
| 4. Hazardous Materials Incident |                                 |



Attachment B

Alignment of Comprehensive Safety and Security Plan with Targeted School Violence Prevention Program





## Operational Services

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

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

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

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

<sup>1</sup> While this sample policy is optional, 105 ILCS 128/45, added by P.A. 101-455 and amended by P.A. 102-791, requires school districts to implement a threat assessment *procedure* “no later than 120 days after [8-26-19]” 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*, Second Edition (August 2016), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: [www.dcs.virginia.gov/sites/dcs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf](http://www.dcs.virginia.gov/sites/dcs.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf). *Threat Assessment in Virginia Public Schools* is based upon a synthesis of established research and recognized standards of practice regarding threat assessment and management in school and workplace settings, including *Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates*, a 2004 publication of the U.S. Secret Service and the U.S. Dept. of Education, at: [www2.ed.gov/admns/lead/safety/threatassessmentguide.pdf](http://www2.ed.gov/admns/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](http://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](http://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 requirements of 105 ILCS 128/45, added by P.A. 101-455 and amended by P.A. 102-791. Its goals and program will be most effective when they reflect local conditions and circumstances.

<sup>2</sup> To balance the requirement to implement a threat assessment procedure (105 ILCS 128/45, added by P.A. 101-455 and amended by P.A. 102-791) 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/](http://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](http://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).<sup>3</sup>
2. Establish Building-level Threat Assessment Team(s)<sup>4</sup> to assess and intervene with individuals whose behavior may pose a threat to safety. This team may serve one or more schools.
3. Comply with State and federal law and align with Board policies.

The Local Governmental and Governmental Employees Tort Immunity Act protects the District from liability. The Program does not: (1) replace the care of a physician licensed to practice medicine in all of its branches or a licensed medical practitioner or professional trained in violence prevention, assessments and counseling services, (2) extend beyond available resources within the District, (3) extend beyond the school day and/or school-sponsored events, or (4) guarantee or ensure the safety of students, District staff, or visitors.<sup>5</sup>

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

<sup>4</sup> 105 ILCS 128/45, added by P.A. 101-455 and amended by P.A. 102-791, requires school districts to establish a threat assessment team “no later than 180 days after [8-26-19].” 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. *Id.* 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. 102-791. 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 Ill. Freedom of Information Act. 5 ILCS 140/7(II), added by P.A. 102-791.

<sup>5</sup> **Consult the board attorney for guidance concerning liability in this area.** Except for cases of willful and wanton conduct, the Local Governmental and Governmental Employees Tort Immunity Act (TIA) likely protects districts from liability for failure to properly identify and/or respond to a student’s behavior that results in injury or suicide. See 745 ILCS 10/3-108 and *Grant v. Board of Trustees of Valley View School Dist. No. 365-U*, 286 Ill.App.3d 642 (3rd Dist. 1997). Every situation is fact specific, and the issues require careful evaluation. A disclaimer, such as the one presented here, may not be sufficient. A district may take several actions, after discussion with its board attorney, to minimize liability, such as adding limiting phrases and ensuring other policies are followed.

In addition to the TIA, school officials and districts may also be entitled to qualified immunity in civil rights lawsuits that seek to hold them liable for a suicide. For further discussion, see f/n 14 in policy 7:290, *Suicide and Depression Awareness and Prevention*.

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 Agencies)

## Operational Services

### Administrative Procedure - Targeted School Violence Prevention Program

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

This administrative procedure contains three sections as follows:

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

#### Glossary of Terms

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

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

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

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

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

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



**Targeted School Violence Prevention Plan (TSVP Plan)** – For purposes of policy 4:190, *Targeted School Violence Prevention Program*, and this procedure, a District-wide plan that is incorporated into each School Emergency Operations and Crisis Response Plan (SEOCR) in 4:170-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 poses a danger to the safety of school staff or students through acts of violence or other behavior that could cause harm to self or others. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means; it is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat or observed by or communicated to a third party, and regardless of whether the target of the threat is aware of the threat. For more information on types of threats, see the subhead entitled **Assessing and Classifying Threats** in 4:190-AP2, *Threat Assessment Team (TAT)*.

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

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

Establishment and Function of Targeted School Violence Prevention Plan

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

Actor	Action
Superintendent	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, <i>Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities</i> ) Teachers Law enforcement representatives Board attorney <sup>2</sup> 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

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

Actor	Action
	<p>a TSVP Plan.</p> <p>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).</p> <p>Informs the Board of the SVP Team's progress, needs, and recommendations by adding information items to the Board's agendas as needed.<sup>3</sup></p> <p>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. 102-791. Informs the Board that this filing was completed.</p>
SVP Team	<p>Meets when called by the Superintendent for the purpose of: (1) developing a TSVP Plan, and (2) creating, implementing, and monitoring TATs.</p> <p>For more information about the function of TATs, see 4:190-AP2, <i>Threat Assessment Team (TAT)</i>. See Recommendation #1 from the <i>Recommendations of the Illinois Terrorism Task Force School Safety Working Group</i>, encouraging districts to establish TATs, at <a href="http://www.iasb.com/IASB/media/School-Safety/ITTFSchoolSafetyRecommendations.pdf">www.iasb.com/IASB/media/School-Safety/ITTFSchoolSafetyRecommendations.pdf</a>.</p> <p>Ensures that the District's TSVP Plan complies with applicable civil rights and other State and federal laws.</p> <p>Ensures that all District staff are annually trained<sup>4</sup> and understand the TSVP Plan, the role of the SVP Team, and the role a TAT.</p> <p>Ensures that procedures are maintained for effective information sharing between the District and local law enforcement agencies and community services agencies, including defining the threshold for law enforcement intervention.</p> <p>Regularly assesses the effectiveness of the TSVP Plan throughout the District, including the establishment of resources for central reporting mechanisms at the District-wide and school-building level.</p>

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

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



Actor	Action
	<p>Identifies policies and procedures or equivalent topics that possibly affect a TSVP Plan, including but not limited to:</p> <ul style="list-style-type: none"> <li>1:20, <i>District Organization, Operations, and Cooperative Agreements</i></li> <li>2:150, <i>Committees</i></li> <li>2:240, <i>Board Policy Development</i></li> <li>3:40, <i>Superintendent</i></li> <li>3:60, <i>Administrative Responsibility of the Building Principal</i></li> <li>4:170, <i>Safety</i></li> <li>4:190, <i>Targeted School Violence Prevention Program</i></li> <li>5:100, <i>Staff Development Program</i></li> <li>5:130, <i>Responsibilities Concerning Internal Information</i></li> <li>5:230, <i>Maintaining Student Discipline</i></li> <li>6:65, <i>Student Social and Emotional Development</i></li> <li>6:120, <i>Education of Children with Disabilities</i></li> <li>6:235, <i>Access to Electronic Networks</i></li> <li>7:20, <i>Harassment of Students Prohibited</i></li> <li>7:130, <i>Student Rights and Responsibilities</i></li> <li>7:140, <i>Search and Seizure</i></li> <li>7:150, <i>Agency and Police Interviews</i></li> <li>7:170, <i>Vandalism</i></li> <li>7:180, <i>Prevention of and Response to Bullying, Intimidation, and Harassment</i></li> <li>7:190, <i>Student Behavior</i></li> <li>7:200, <i>Suspension Procedures</i></li> <li>7:210, <i>Expulsion Procedures</i></li> <li>7:230, <i>Misconduct by Students with Disabilities</i></li> <li>7:250, <i>Student Support Services</i></li> <li>7:340, <i>Student Records</i><sup>5</sup></li> <li>8:10, <i>Connection with the Community</i></li> <li>8:95, <i>Parental Involvement</i></li> </ul>

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

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

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

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

Actor	Action
	<p>8:100, <i>Relations with Other Organizations and Agencies</i></p> <p>Recommends, through the Superintendent, proposed policy changes to the Board for consideration. See Board policy 2:240, <i>Board Policy Development</i>.</p> <p>Recommends and procures resources for stakeholder training.</p>
Building Principal	<p>Ensures 4:170-AP1, <i>Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCR)</i>, is:</p> <ul style="list-style-type: none"> <li>Available throughout schools (do <b>not</b> limit to office);</li> <li>Distributed to and discussed with local law enforcement; and</li> <li>Regularly reviewed with building staff.</li> </ul> <p>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.</p> <p>Notifies and educates staff, parent(s)/guardian(s), students, and community members: (1) to report individuals and situations of concern to any school administrators or other authorities, i.e., local law enforcement, and (2) how school officials will address these concerns. Distributes Board policy 4:190, <i>Targeted School Violence Prevention Program</i>; 4:190-AP2, E6, <i>Targeted School Violence and Threat Assessment Education</i>; and 7:180-AP1, E2, <i>Be a Hero by Reporting Bullying</i>; and discusses what TATs are and what they do when they learn of threats and/or school violence.<sup>6</sup></p> <p>Assesses the feasibility of forming an anonymous tip line and organizing its management.</p> <p>When a tip or concern is raised, ensures TATs are trained to engage in their work. See 4:190-AP2, <i>Threat Assessment Team (TAT)</i>.</p>
All District staff, volunteers, and	Read 4:190-AP2, E6, <i>Targeted School Violence and Threat Assessment</i>

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

For more school climate discussions, see *Guide for Developing High-Quality School Emergency Operations Plans*, U.S. Depts. of Education, Health and Human Services, Homeland Security, Justice, Federal Bureau of Investigation, and Federal Emergency Management Agency (June 2013): [rems.ed.gov/docs/REMS\\_K-12\\_Guide\\_508.pdf](https://www.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
contractors	<p><i>Education.</i></p> <p>Immediately report to the Building Principal or designee any expression of intent to harm another person, concerning communication, or concerning behavior that suggests an individual may intend to commit an act of targeted violence.</p> <p>Upon belief that an individual/situation poses a clear and immediate threat of serious violence that requires containment, notify school security and/or law enforcement in accordance with the SEOCR. See 4:170-AP1, <i>Comprehensive Safety and Security Plan</i>.</p>
School Board	<p>Monitors 4:190, <i>Targeted School Violence Prevention Program</i>, and considers adopting changes recommended by the SVP Team. See Board policy 2:240, <i>Board Policy Development</i>.</p> <p>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. 102-791.</p> <p>Provides both the SVP Team and TATs with appropriate resources, which may include providing resources and access for staff professional development opportunities. These opportunities should train staff to properly respond to individuals who provide them with information about a threat or school safety concern.<sup>7</sup></p>
Superintendent/Building Principal	<p>Ensures the student behavior policies referred to in student handbooks notify students that threatening behavior could subject a student to disciplinary consequences. See Board policies 7:180, <i>Prevention of and Response to Bullying, Intimidation, and Harassment</i>, and 7:190, <i>Student Behavior</i>.</p> <p>Ensures that staff responds to students who provide them with information about a threatening or concerning individual/situation.</p>

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 trainings related to each existing SEOCR.

Actor	Action
Superintendent, Building Principal, and SVP Team	Examine 4:170-AP1, <i>Comprehensive Safety and Security Plan</i> , and recommend any changes to existing procedures to the Superintendent or District Safety Coordinator.

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

Actor	Action
District Safety Coordinator	<p>Meets with SVP Team to foster an understanding of what additional items each 4:170-AP1 Safety Team (see 4:170-AP1, <i>Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities</i>) might add to its procedures to accomplish a response and recovery.</p> <p>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.</p> <p><b>Note:</b> During a crisis, legal counsel will be a crucial part of crisis response and management (but not necessarily public relations and communication) because school officials must make split-second decisions, often with legal consequences to the District. Local law enforcement’s familiarity with the identity of the District’s legal counsel <i>before</i> a crisis occurs will assist with a faster connection between legal counsel and the school officials involved in the early stages of a Targeted School Violence Crisis and the immediate response to it.</p> <p>Considers designating a trained public relations and communication manager to inform parent(s)/guardian(s) and the community during a crisis and to keep pace with social media information.</p>
Superintendent and Building Principal(s)	<p>For crisis preparedness and response, ensure that:</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCRCP)</i>, reflects each individual building’s needs.</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Part F, School Safety Drill Plan</i>, supports a TSVP Plan.</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Parts G and H</i>, reflects each building’s needs. Also ensure that multiple copies of these plans exist, and direct that appropriate persons have access to the plans, e.g., local law enforcement authorities, etc. One copy in the Building Principal’s office is insufficient.</p> <p>For crisis recovery, ensure that 4:170-AP1, <i>Comprehensive Safety and Security Plan, Parts I, J, and K</i>, reflects District needs and that the Board Attorney is aware of the plans.</p> <p>Recommend to the District Safety Coordinator any other additional crisis recovery items that the 4:170-AP1 Safety Team deems necessary.</p>



## Operational Services

### Administrative Procedure - Threat Assessment Team (TAT) <sup>1</sup>

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

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

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

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

4. Glossary of Terms
5. TAT Formation, Development, and Responsibilities
6. Assessing and Classifying Threats
7. Responding to and Managing Threats
8. Reporting Threats to Outside Agencies

#### Glossary of Terms

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

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

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<sup>1</sup> Required by 105 ILCS 128/45, added by P.A. 101-455 and amended by P.A. 102-791. School districts had to implement a threat assessment procedure “no later than 120 days after [8-26-19]” and establish a threat assessment team “no later than 180 days after [8-26-19].” *Id.*

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

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

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

**Threat Assessment Team (TAT)** – A multidisciplinary Building-level team lead by the Building Principal to perform specific threat assessments 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. <sup>3</sup>

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

**Types of Threats –**

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

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

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

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

TAT Formation, Development, and Responsibilities

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

Actor	Action
Superintendent or designee	Ensures TATs are trained in threat assessment by a threat assessment expert. <sup>4</sup> Free statewide training is available through the Ill. School and Campus Safety Program, at: <a href="http://www2.illinois.gov/ready/plan/Pages/schools-training.aspx">www2.illinois.gov/ready/plan/Pages/schools-training.aspx</a> .  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. 102-791. Informs the Board that this filing was completed.
Building Principal	Selects TAT members with expertise in:

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<sup>3</sup> 105 ILCS 128/45(a), added by P.A. 101-455. Districts that are unable to establish a threat assessment team with school district staff and resource may use a regional behavioral threat assessment and intervention team that includes mental health professionals, a representative from the Ill. Law Enforcement Alarm System, a safety education officer from the Ill. State Police, and local law enforcement representatives. *Id.*

<sup>4</sup> Many threat assessment publications outline that the best practice is for the entire TAT, as a team, to attend in-person threat assessment training by a threat assessment expert.



Actor	Action
	<p>School administration, e.g., a principal or other senior administrator from the school(s) covered by the TAT and human resource professionals;</p> <p>Instruction, e.g., a teacher or administrator with recent instructional experience;</p> <p>Counseling, e.g., a school counselor, school psychologist and/or school social worker;</p> <p>Law enforcement, e.g., a school resource officer;</p> <p>Being a staff member in the building; and</p> <p>Other community resource persons (as members or consultants as determined by the TAT).</p> <p>Designates a TAT triage team. See 4:190-AP2, E2, <i>Threat Assessment Documentation</i>.</p> <p>When a tip or concern is raised, activates the TAT and uses this procedure.</p>
TAT	<p>Receives education and seeks training resources, including 4:190-AP2, E1, <i>Principles of Threat Assessment</i>.</p> <p>Receives threat assessment training by a threat assessment expert.</p> <p>Commits to work collaboratively with each other, with other school staff, and (as appropriate) with community resource persons to support the safety of the school, its students, and its staff.</p> <p>Actively, lawfully, and ethically communicates with each other, District administrators, and other school staff who have a need to know particular information to support the safety of the school, its students, and its staff.</p> <p>Trains staff, students, parents/guardians, and other members of the school community to recognize and report possible threats by conducting presentations, broadly disseminating relevant information, and ensuring access to consultation from the TAT.</p> <p>Identifies and trains members of the school community who can take reports of possible threats.</p> <p>Effectively implements Board policy 4:190, <i>Targeted School Violence Prevention Program</i>.</p>

Assessing and Classifying Threats

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

Actor	Action
Building Principal	<p>Educates him/herself about <i>types</i> of threats.</p> <p>Determines if an imminent threat exists. If an imminent threat exists, notifies law enforcement in accordance with 4:170-AP1, <i>Comprehensive Safety and Security Plan, Part G, School Emergency</i></p>

Actor	Action
Building Principal and/or TAT Triage Team	<p><i>Operations and Crisis Response Plan (SEOCRCP).</i></p> <p>If no imminent threat exists, or once an imminent threat is contained, triages threat (with the TAT Triage Team, if one is designated by the Building Principal) to determine if the full TAT must be involved. See 4:190-AP2, E2, <i>Threat Assessment Documentation</i>.</p> <p>Triage may include:</p> <ul style="list-style-type: none"> <li>Reviewing the threatening communication and/or behavior.</li> <li>Reviewing school and other records for any prior history or interventions with the individual(s) involved.</li> <li>Evaluating the threat in context so that the meaning of the threat and intent can be determined by, among other things, conducting timely and thorough interviews (as necessary) with the person(s) who reported the threat, the threat recipient(s)/target(s), other witnesses who have knowledge of the threat, and when reasonable, the subject of concern (subject) who allegedly engaged in the threatening communication and/or behavior.</li> </ul> <p>If the full TAT needs to be involved, convenes it as soon as possible.</p>
TAT	<p>Assesses the threat. See 4:190-AP2, E3, <i>Threat Assessment Key Areas and Questions; Examples</i>, for key questions to ask the person(s) who reported the threat, the threat recipient(s)/target(s), other witnesses, and the subject in order to assess the threat.</p> <p>Once the assessment is complete, classifies the threat using the following basic criteria:</p> <p>Documents the threat assessment and classification using 4:190-AP2, E2, <i>Threat Assessment Documentation</i>, and ensures that TAT documentation follows the acronym FORT:<sup>5</sup></p> <ul style="list-style-type: none"> <li><b>F Fair</b> – sought to understand situations and give individuals an opportunity to be heard and understood;</li> <li><b>O Objective</b> – sought information based on facts and observations of the case and not speculation or bias;</li> <li><b>R Reasonable</b> – engaged in responses that were effective and proportionate to the situation; and</li> <li><b>T Timely</b> – quickly and responsively addressed reports of threatening behavior.</li> </ul>

#### Responding to and Managing Threats

Actor	Action
TAT	<p>Identifies appropriate responses to the threat based upon its level. See 4:190-AP2, E4, <i>Responding to Types of Threats</i>, for guidance on responses to each threat level.</p> <p>Develops, implements, and monitors an individualized, fact-based case</p>

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<sup>5</sup> Source: © G. Deisinger (1996).