

OK as is.
Share w/ Scott Meedy
& Trisha Martinez
(page 8)

Operational Services

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Administrative Procedure - Comprehensive Safety and Security Plan

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Attachment A – School Emergency Operations and Crisis Response Plan Format

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A. Safety and Security Related Administrative Procedures and Forms

Administrative material on school safety and security may be implemented under this plan, including, without limitation, any in the following list.

- 4:60-AP3 *Criminal History Records Check of Contractor Employees*
- 4:110-API *School Bus Post-Accident Checklist*
- 4:110-AP3 *School Bus Safety Rules*
- 4:110-E *Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses*
- 4:160-AP *Environmental Quality of Buildings and Grounds*
- 4:170-API, E1 *Accident or Injury Form*
- 4:170-API, E2 *Memo to Staff Members Regarding Contacts by Media About a Crisis*
- 4:170-AP2 *Routine Communications Concerning Safety and Security*
- 4:170-AP2, E1 *Letter to Parents/Guardians Regarding Student Safety*
- 4:170-AP2, E2 *Letter to Parents/Guardians Regarding the Dangers of Underage Drinking*
- 4:170-AP2, E3 *Letter to Parents/Guardians About Disruptive Social Media Apps; Dangers*
- 4:170-AP2, E4 *Letter to Parents/Guardians About Preventing and Reducing Incidences of Sexting*

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This procedure follows the recommendations in the *Guide for Developing High-Quality School Emergency Operations Plans*, produced by a collaboration of federal agencies in 2013, at www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf. The *Guide* informs schools what they need to do, not what to do. It recommends a process for developing, implementing, and continually refining a school emergency operations plan as well as a discussion of its form, function, and content.

| | |
|---------------|---|
| 4:170-AP2, E5 | <i>Notice to Parents/Guardians of Lockdown Drill; Opt-out</i> |
| 4:170-AP4 | <i>National Terrorism Advisory System</i> |
| 4:170-AP5 | <i>Unsafe School Choice Option</i> |
| 4:170-AP6 | <i>Plan for Responding to a Medical Emergency at a Physical Fitness Facility with an AED</i> |
| 4:170-AP6, E1 | <i>School Staff AED Notification Letter</i> |
| 4:170-AP6, E2 | <i>Notification to Staff and Parents/Guardians of CPR and AED Video</i> |
| 4:170-AP8 | <i>Movable Soccer Goal Safety</i> |
| 4:175-AP1 | <i>Criminal Offender Notification Laws; Screening</i> |
| 4:175-AP1, E1 | <i>Informing Parents/Guardians About Offender Community Notification Laws</i> |
| 4:180-AP1 | <i>School Action Steps for Pandemic Influenza or Other Virus/Disease</i> |
| 4:180-AP2 | <i>Pandemic Influenza Surveillance and Reporting</i> |
| 4:190 | <i>Targeted School Violence Prevention Program</i> |
| 4:190-AP1 | <i>Targeted School Violence Prevention Program</i> |
| 4:190-AP1, E1 | <i>Targeted School Violence Prevention Program Resources</i> |
| 4:190-AP2 | <i>Threat Assessment Team (TAT)</i> |
| 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> |
| 4:190-AP2, E5 | <i>Threat Assessment Case Management Strategies</i> |
| 4:190-AP2, E6 | <i>Targeted School Violence Prevention and Threat Assessment Education</i> |
| 6:235-E4 | <i>Keeping Yourself and Your Kids Safe On Social Networks</i> |
| 6:235-E5 | <i>Children's Online Privacy Protection Act</i> |
| 7:140-AP | <i>Use of Metal Detectors and Searches for Student Safety</i> |
| 7:140-E | <i>Letter to Parents/Guardians Regarding the Right to Privacy in the School Setting Act</i> |
| 7:150-AP | <i>Agency and Police Interviews</i> |
| 7:280-AP | <i>Managing Students with Communicable or Infectious Diseases</i> |
| 7:290-AP | <i>Resource Guide for Implementation of Suicide and Depression Awareness and Prevention Program</i> |

B. Definitions

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*SEOCR*P is a School Emergency Operations and Crisis Response Plan (formerly *Emergency Operations Plan*). Each school or facility has an *SEOCR*P.

First responders are local law enforcement, fire department officials, emergency medical services personnel, and any other entity in the community that provides emergency assistance.

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The term *emergency operations and crisis response plan* is used because federal agencies refer to school *emergency operations plans*, and the School Safety Drill Act (105 ILCS 128/) refers to *emergency and crisis response plans*.

4:170-AP1

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Incident means any event or occurrence that threatens the safety and security of individuals on school property or at school events.

District Safety Coordinator is the individual who manages the District's safety and security efforts.

Safety Team is the Superintendent's administrative committee that is responsible for its respective SEOCR. Each school or facility has a Safety Team.

SRO means school resource officer, defined as a law enforcement officer who has been primarily assigned to a school or school district under an agreement with a local law enforcement agency.

C. District Safety Coordinator and Safety Team; Responsibilities

The Superintendent appoints an administrator to be the **District Safety Coordinator** to manage the District's safety and security efforts and serve as the District's spokesperson during a crisis or emergency.

The Superintendent appoints members of a **Safety Team** for each school or facility, with input from the District Safety Coordinator and each school's Building Principal. The Building Principal and SRO, if any, shall be members of the Safety Team.

The District Safety Coordinator and each school's Safety Team are responsible for developing, implementing, and maintaining a **SEOCR** with the following objectives as explained in FEMA's *Guide for Developing High-Quality School Emergency Operations Plans (2013)*, at www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf:

- **Prevention**, meaning the capabilities needed to avoid, deter, or stop an incident. Prevention requires the use of: (a) research-based principles of safety and security, (b) an ongoing analysis of data (e.g., incident and inspection reports, complaints, suggestions), and (c) an ongoing program for identifying and evaluating unreasonable risks.
- **Protection**, meaning the capabilities needed to secure schools against violence and manmade or natural disasters. Protection focuses on ongoing actions that protect students, teachers, staff, visitors, networks, and property from a threat or hazard.
- **Mitigation**, meaning the capabilities needed to reduce the likelihood or impact of an incident or emergency. Mitigation requires, among other things, high-quality training, and instruction programs to execute and improve the SEOCR.
- **Response**, meaning the capabilities needed to stabilize an incident, save lives, establish a safe and secure environment, and facilitate the transition to recovery. Effective response requires, among other things, a clear, rapid, factual, and coordinated system of internal and external communication.
- **Recovery**, meaning the capabilities needed to restore the learning environment.

D. Safety Team Meetings

The District Safety Coordinator chairs the Safety Team meetings. The meetings are held as determined by the District Safety Coordinator. **At least once annually, the Safety Team shall request the participation of first responders and the Board Attorney in a meeting to review and provide input.** The following matters are suggested agenda items:

- Review the agenda and determine who will take meeting notes.
- Review the notes from the previous meeting.
- Discuss the status of previously submitted recommendations.
- Receive, review, and discuss individual and Safety Team committee reports and recommendations concerning one or more items below.
 1. Safety and security data from incidents, investigations, audits, etc.

2. Recommendations received from stakeholders and first responders
 3. Emerging issues
 4. Status of the SEOCR
 5. Status of the safety and security communication system
 6. Status of training programs
 7. Status of programs to build awareness of, and support for, the SEOCR (contests, posters, drives, etc.)
- Clarify information and recommendations for a report to the Superintendent.
 - Confirm the Safety Team meeting schedule and review upcoming meeting dates.

E. Annual Safety Review

The District Safety Coordinator facilitates the annual safety review meeting conducted by the School Board or its designee, as required by 105 ILCS 128/25, amended by P.A.s 102-395 and 103-608, eff. 1-1-25, and 128/30. During the annual safety review, the law requires the School Board or its designee to “review each school building’s emergency and crisis response plans, protocols, and procedures, including procedures regarding the District’s threat assessment team, procedures regarding the District’s cardiac emergency response plan, the efficacy and effects of law enforcement drills, and each building’s compliance with the school safety drill programs.” If the school board uses a designee, it should preferably be someone other than the District Safety Coordinator to assure an unbiased audit. The District Safety Coordinator assists the Board or its designee to comply with annual review requirements, including without limitation, the completion of a report certifying that the review took place. See the Ill. State Board of Education (ISBE) website for an annual review checklist and report at: www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx. The Open Meetings Act (OMA) allows the Board to enter closed session to discuss security procedures, school building safety and security, and the use of personnel and equipment to respond to an actual, a threatened, or a reasonably potential danger to the safety of employees, students, staff, the public, or public property. 5 ILCS 120/2(c)(8). Consult the Board Attorney for assistance with this OMA exception.

F. School Safety Drill Plan

The School Safety Drill Act (105 ILCS 128/, amended by P.A.s 102-395, 102-791, 103-104, 103-197, and 103-780) and any implementing State administrative rules shall supersede this procedure in the event of a conflict.

The Building Principal shall keep the Superintendent or designee informed of when drills are scheduled and/or accomplished. ISBE’s fillable *School Drill Documentation* form for documenting the completion of minimum drill requirements may be used (see www.isbe.net/Documents/91-02_school_drill_documentation.pdf).

Each academic year, each school building that houses students must conduct a minimum of:

1. **Three school evacuation drills.** These drills prepare students and personnel for situations that occur when conditions outside of a school building are safer than inside a school building. Evacuation may be necessary depending on the circumstances. They may include a fire, suspicious item or person, or incident involving a hazardous material, including but not limited to a chemical, incendiary, explosive, and bomb threat.

One of the three school evacuation drills requires the participation of the appropriate local fire department, unless waived as provided below. A date is selected according to the following timeline:

- No later than **September 1** of each year, the local fire department or fire district must contact the Building Principal in order to make arrangements.

- No later than **September 14** of each year, the Building Principal or designee and the local fire department or fire district may agree to waive the provisions concerning participation by the local fire department in a school evacuation drill.
- No later than **September 15** of each year, each Building Principal or designee must contact the responding local fire official and propose to the local fire official four dates within the month of October, during at least two different weeks of October, on which to hold the drill. The fire official may choose any of the four available dates, and if he or she does so, the drill occurs on that date.
- Alternatively, the Building Principal or designee and the local fire official may, by mutual agreement, set any other date for the drill, including a date outside of the month of October.
- If the fire official does not select one of the four offered dates in October or set another date by mutual agreement, the school does not need to include the local fire service in one of its mandatory school evacuation drills.

After a drill in which the local fire service participated, the Building Principal should request certification from the local fire service that the school evacuation drill was conducted. Additional school evacuation drills for fire incidents may involve the participation of the appropriate local fire department. In addition, schools may conduct additional school evacuation drills to account for other evacuation incidents, including without limitation, suspicious items or bomb threats.

2. **One school bus evacuation drill.** This drill prepares students and school personnel for situations that occur when conditions outside of the bus are safer than inside the bus. Evacuation may be necessary, depending on the circumstances, in the event of a fire, suspicious items, and incidents involving hazardous materials. Schools may conduct additional bus evacuation drills.

In addition, instruction on safe bus riding practices should be provided for all students. See administrative procedure 4:110-AP3, *School Bus Safety Rules*.

3. **One severe weather and shelter-in-place drill.** This drill prepares students for situations involving severe weather emergencies or the release of external gas or chemicals. Severe weather and shelter-in-place drills must address and prepare students and school personnel for possible tornado incidents. Other drills shall be based on the needs and environment of particular communities, including severe weather (such as tornadoes, wind shears, lightning, and earthquakes), incidents involving hazardous materials, and incidents involving weapons of mass destruction.

4. **One law enforcement lockdown drill.** This drill addresses a school shooting incident and evaluates the preparedness of school personnel and students for situations calling for the involvement of law enforcement when there is an active threat or an active shooter within a school building. A law enforcement lockdown drill must occur no later than 90 days after the first day of each school year. This drill must be conducted: (a) according to the District's emergency operations and crisis response plan(s), (b) on days and times when students are normally present in the school building, and (c) with the participation of all school personnel and students present at school at the time of the drill, except for those exempted at the discretion of administrators or school support personnel. The appropriate local law enforcement agency must observe administration of the drill.

Schools must notify parents/guardians in advance of any lockdown drill that involves student participation, and must allow parents/guardians to exempt their child from

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105 ILCS 128/20(c), amended by P.A. 102-395. While 105 ILCS 128/20(c) uses both *lockdown drill* and *walk-through lockdown drill*, the terms are synonymous. For brevity, this material uses the term *lockdown drill*.

participating for any reason. The District may, at its discretion, exempt a student from participating in a lockdown drill. 105 ILCS 128/20(c)(4), added by P.A. 102-395. When deciding whether to exempt a student, the District must include the student's individualized education program team or 504 plan team, if any, in the decision. 105 ILCS 128/20(c)(4), amended by P.A. 103-197. For students who do not participate in the lockdown drill, districts must provide alternative safety education and instruction related to an active threat or active shooter event. For students who do participate in the lockdown drill, districts must allow them to ask questions related to it. See exhibit 4:170-AP2, E5, *Notice to Parent/Guardian of Lockdown Drill; Opt-out*. In addition, a law enforcement lockdown drill must meet each of the following criteria:

- During each calendar year, the appropriate local law enforcement agency contacts the Building Principal to request participation in the law enforcement lockdown drill. The Building Principal and the local law enforcement agency shall set, by mutual agreement, a date for the drill.
- The lockdown drill involves the onsite participation of the local law enforcement agency, provided that an agreeable date can be reached between the Building Principal and the local law enforcement agency. If the parties cannot reach an agreeable date, the school shall hold the drill without participation from the local law enforcement agency.
- After a drill in which local law enforcement participated, the Building Principal should request a certification from local law enforcement that the law enforcement lockdown drill was conducted. The local law enforcement agency shall also notify the school of any deficiencies noted during the drill.
- The lockdown drill cannot include any simulations that mimic an actual school shooting incident or active shooter event. Law enforcement may only run an active shooter simulation, including simulated gun fire drills, on school days when students are not present.
- All lockdown drills must be announced in advance to all school personnel and students prior to the commencement of the drill.
- Lockdown drill content must be age and developmentally appropriate, and must include trauma-informed approaches to address the concerns and well-being of school personnel.
- Lockdown drills must include and involve school personnel, including school-based mental health professionals.

The District Safety Coordinator, in cooperation with the Building Principal, shall encourage local law enforcement agencies to establish a school walk-through program. This program encourages local law enforcement officials to walk through school properties during their patrols with the goal of increasing security (school districts are encouraged, but not mandated, to do this by House Resolution 153 (98th General Assembly, 2013)).

G. School Emergency Operations and Crisis Response Plan (SEOCR)

Each Safety Team shall develop, implement, and maintain a SEOCR using the process below, as explained in FEMA's *Guide for Developing High-Quality School Emergency Operations Plans (2013)*, at: www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf:

1. Develop a schedule and invite the participation of first responders.
2. Identify threats and hazards, assess risks, and prioritize threats and hazards.
3. Determine goals and objectives.
4. Develop, review, evaluate, and maintain the SEOCR.

5. Share the SEOCRCP with stakeholders and train them. This includes, without limitation, having the SEOCRCP accessible in a digital format.

Each SEOCRCP shall include a plan for local law enforcement to rapidly enter a school building in an emergency. 105 ILCS 128/55, added by P.A. 103-194 and renumbered by P.A. 103-605.

Each SEOCRCP shall be in the format suggested by and explained in FEMA's *Guide for Developing High-Quality School Emergency Operations Plans (2013)*, at www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf. See also *The Role of Districts in Developing High-Quality School Emergency Operations Plans: A Companion to the School Guide (2019)*, at: https://rems.ed.gov/docs/District_Guide_508C.pdf; and the **Attachment** to this procedure.

H. Material to be Included in Each SEOCRCP

Each school Safety Team annually gathers and/or renews the following material for inclusion in the SEOCRCP:

1. District-level Targeted School Violence Prevention Plan. See Board policy 4:190, *Targeted School Violence Prevention Program*, and administrative procedure 4:190-AP1, *Targeted School Violence Prevention Program*.
2. Building-level Threat Assessment Team procedures. See administrative procedure 4:190-AP2, *Threat Assessment Team (TAT)*.
3. Building evacuation protocol. The Building Principal or designee shall: (a) keep a comprehensive evacuation map - describing main and alternate routes - in the main office, (b) post signs containing main and alternate evacuation routes for each occupied area in a conspicuous place, preferably near the exit, (c) prepare evacuation plans for outdoor areas (playgrounds and stadiums), and (d) keep all staff informed of the evacuation plans.
4. Documents concerning safety drills. The Building Principal shall schedule, execute, and document safety drills as per the School Safety Drill Act (105 ILCS 128/, amended by P.A.s 102-395, 102-791, 103-104, 103-197, and 103-780) and this procedure.
5. Maps and layouts, including: (a) campus map, (b) building floor plan, (c) location of first aid kits, automated external defibrillators (AEDs), fire extinguishers, and any trauma kits (105 ILCS 5/10-20.85, added by P.A. 103-128), and (d) map or plan describing the areas to be used in the event of an emergency or crisis for triage, emergency helicopter landing, media center, non-victim students, and parents/guardians. The Safety Team or Principal shall annually give a copy of these to first responders.
6. A protocol to secure a list of people present in the building at any time.
7. Tornado response plan, including a map showing tornado wall locations (105 ILCS 128/25).
8. Carbon monoxide alarm or detector activation plans, protocols, and procedures (105 ILCS 5/10-20.57 and 430 ILCS 135/).
9. The safety equipment's maintenance schedule and the person(s) responsible.
10. An emergency early dismissal protocol.
11. A plan for inviting warnings or tips, e.g., a hotline or website for individuals to make anonymous tips.
12. A protocol for student supervision in the event of an emergency or crisis.
13. A safety patrol plan (105 ILCS 5/10-22.28).
14. Bicycle use rules.
15. Roadway and parking rules.

16. Emergency procedures to be followed in cases of injury to or sudden illness of students and/or staff at school and school events (23 Ill.Admin.Code §1.530(c)).
17. A cardiac emergency response plan in accordance with guidelines set forth by the American Heart Association or other nationally recognized, evidence-based standard that addresses the appropriate response to incidents involving an individual experiencing sudden cardiac arrest or a similar life-threatening emergency (105 ILCS 128/60, added by P.A. 103-608, eff. 1-1-25). The plan must include:
 - a. Procedures to follow during a cardiac emergency;
 - b. A list of every AED that is present and clearly marked or easily accessible at school athletic venues and events and at school, and the maintenance schedule for the AEDs; and
 - c. The provision of information on hands-only cardiopulmonary resuscitation and use of AEDs to teachers, administrators, coaches, assistant coaches, and other school staff as identified by administrators, in accordance with 105 ILCS 110/3. Id.
18. See the American Heart Association's cardiac emergency response plan template and implementation materials, at www.heart.org/CERP. A plan for giving students instructions on safe school bus riding practices, including the operation and use of emergency doors and windows (as a means of escape), seat belts, and fire extinguisher (105 ILCS 128/20(b)). The District's parent-teacher advisory committee, in cooperation with school bus personnel, establishes and maintains bus safety rules (105 ILCS 5/10-20.14). See administrative procedure 4:110-AP3, *School Bus Safety Rules*.
19. Safety and security related administrative material. See section A, above.
20. The location of any door security locking means and the use of the locking and unlocking means from within and outside the room(s) (105 ILCS 5/10-20.72, renumbered by P.A. 102-558).
21. Other documents identified by the Safety Team.

I. Managing Communications During and About an Emergency or Crisis

The District Safety Coordinator, with assistance from the Safety Team, is responsible for compiling information and preparing communications concerning an emergency or crisis. The District Safety Coordinator serves as the spokesperson during a crisis or emergency. All District communications should come from this source to ensure accuracy, creditability, and compliance with laws granting confidentiality to student records.

The spokesperson shall follow best practices for spokespersons during an emergency or crisis and receive training on public relations. The Board Attorney serves as a resource to the spokesperson. The objective is:

- To provide the maximum amount of verified information to staff members, students' family members, and the media as quickly as possible,
- While simultaneously respecting student privacy and complying with laws granting confidentiality to student records (Ill. School Student Records Act, 105 ILCS 10/; Family Educational Rights and Privacy Act, 20 U.S.C. §1232g). See administrative procedure 7:340-AP1, *School Student Records*.

All staff members are requested to refrain from spreading information about an emergency or crisis unless the information is from the District Safety Coordinator. All inquiries should be directed to the spokesperson.

Everyone in the school community can positively affect an emergency or crisis situation by:

1. Avoiding speculation as to the cause.

2. Avoiding allocation of blame.
3. Helping school and law enforcement officials gather the facts.
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. Observes or 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 a battery committed against any staff member or is subject to a battery. 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. 105 ILCS 5/10-27.1A(b), 5/10-27.1B, and 5/10-21.7. 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 and any involved student’s parent/guardian. See the **Required Notices** subhead of Board policy 7:190, *Student Behavior*, and exhibit 3:60-E, *Event Reporting and Notice Requirements for Building Principals Concerning School Safety and Security*.

Upon receiving a report of any of the above Nos. 1-3, the Superintendent or designee shall immediately notify local law enforcement. 105 ILCS 5/10-27.1A, amended by P.A.s 103-34, 103-609 (first to pass both houses) and 103-780 (second to pass both houses and controlling); 105 ILCS 5/10-27.1B, amended by P.A.s 103-609 (first to pass both houses) and 103-780 (second to pass both houses and controlling); and 105 ILCS 5/10-21.7. The Superintendent or designee will also report these incidents to ISBE through its web-based School Incident Reporting System (SIRS) as they occur during the year but no later than July 31 for the preceding school year. Id. SIRS is available at 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. Reporting on SIRS does not satisfy the requirement to report incidents to local law enforcement authorities.

K. Resources

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The building principal must notify the student’s parent/guardian only when the alleged offense is firearm possession. 105 ILCS 5/10-27.1A(b). The **Required Notices** subhead of sample policy 7:190, *Student Behavior*, and section **J. Required Notices** of this sample administrative procedure expand this notification duty to include drug-related incidents and battery of a staff member. See f/n 56 in sample policy 7:190, *Student Behavior* and f/n 1, above. If your board has not expanded this notification duty in policy 7:190, *Student Behavior*, amend the second sentence as follows:

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 and, if a student is reportedly in possession of a firearm, also any involved student’s parent/guardian.

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105 ILCS 5/10-27.1 requires reporting through SIRS no later than August 1, while 105 ILCS 5/10-27.1A and 5/10-27.1B both require reporting through SIRS no later than July 31. 105 ILCS 5/10-27.1; 105 ILCS 5/10-27.1A and 5/10-27.1B, both amended by P.A.s 103-609 (first to pass both houses) and 103-780 (second to pass both houses and controlling). Since reporting no later than July 31 meets all three reporting requirements, this sample administrative procedure states that all reporting will occur no later than July 31.

Guide for Developing High-Quality School Emergency Operations Plans: At a Glance
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

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

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

ALICE (Alert, Lockdown, Inform, Counter, Evacuate) Training Institute www.alicetraining.com

ISBE/OSFM All Hazard Preparedness Guide for Illinois Schools www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx

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

Schools/Campus – Resources, including School Safety Information Sharing <https://ready.illinois.gov/plan/schools.html>

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/

Illinois Terrorism Task Force (ITTF) <https://ready.illinois.gov/hazards/terrorism.html>

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

U.S. Secret Service (USSS) National Threat Assessment Center (NTAC) www.secretservice.gov/protection/ntac

Improving School Safety Through Bystander Reporting: A Toolkit for Strengthening K-12 Reporting Programs, developed by the USSS NTAC and the Cybersecurity and Infrastructure Security Agency (CISA) www.secretservice.gov/sites/default/files/reports/2023-05/cisa-uss-k-12-bystander-reporting-toolkit-508_final_0.pdf

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.ojp.gov/ncjrs/virtual-library/abstracts/bomb-threat-response-interactive-planning-tool-schools-cd-rom

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

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 |

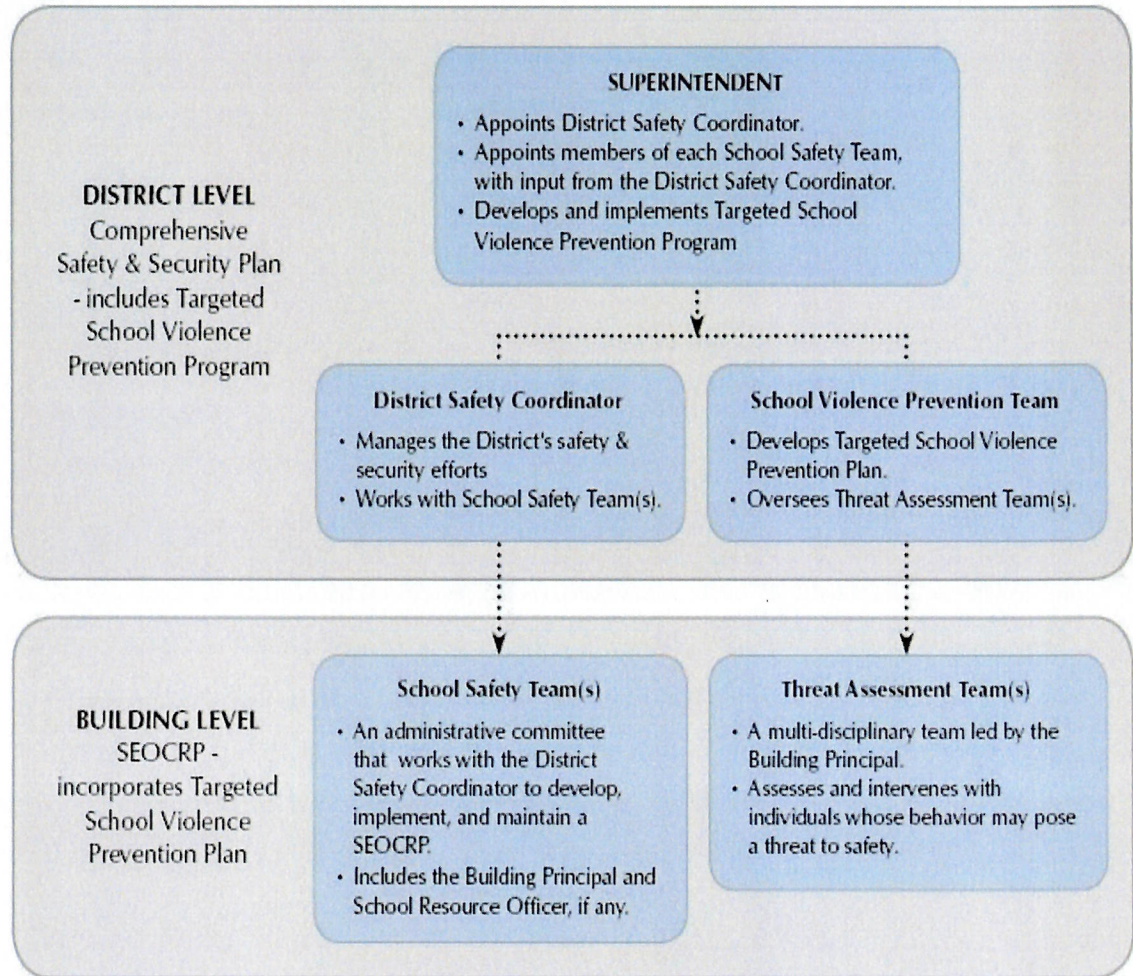
Threat- or Hazard-Specific Annexes

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



OK as IS
Share w/ Scott,
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4:190-AP2

Operational Services

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Administrative Procedure - Threat Assessment Team (TAT)

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:

- 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 administrative procedure 4:190-AP1, *Targeted School Violence Prevention Program*, and exhibits 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.

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

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Required by 105 ILCS 128/45, amended by P.A.s 102-791, 103-175, and 103-780. School districts had to implement a threat assessment procedure by 12-21-19 and establish a threat assessment team by 2-19-20. Id.

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.

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

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 led by the Building Principal to perform specific threat assessments that must include at least one law enforcement official as well as cross-disciplinary representatives of the District who are most directly familiar with the mental and behavioral health needs of students and staff. Such cross-disciplinary representatives may include the following individuals employed by the District or a special education cooperative that serves the District and who are available to serve: an administrator, a teacher, a school counselor, a school psychologist, and a school social worker.

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 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.

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105 ILCS 128/45(a), amended by P.A. 103-780. 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 Ill. Law Enforcement Alarm System, a safety education officer from the Ill. State Police, and local law enforcement representatives. *Id.*

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 | <p>Ensures TATs are trained in threat assessment by a threat assessment expert. Free statewide training is available through the Ill. School and Campus Safety Program, at: https://ready.illinois.gov/plan/schools.html.</p> <p>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.</p> |
| Building Principal | <p>Leads TAT.</p> <p>Selects TAT members, including at least one law enforcement official as well as cross-disciplinary representatives of the District who are most directly familiar with the mental and behavioral health needs of students and staff. Such cross-disciplinary representatives may include the following individuals employed by the District or a special education cooperative that serves the District and who are available to serve:</p> <ul style="list-style-type: none"> An administrator; A teacher; A school counselor; A school psychologist; A school social worker; and Other District employees and/or community resource persons (as members or consultants as determined by the TAT). <p>When resources allow, selects designated back-up for each core TAT member, from the same or similar areas of expertise, to fulfill their duties in the event of their absence or inability.</p> <p>Designates a TAT Triage Team.</p> <p>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.</p> <p>Establishes an intake and triage process for reports regarding concerning, aberrant, or threatening behavior and/or communication.</p> <p>When a report is received, activates the TAT and uses this administrative procedure 4:190-AP2, <i>Threat Assessment Team (TAT)</i>.</p> |

| Actor | Action |
|-------|---|
| TAT | <p>Receives education and seeks training resources, including but not limited to exhibits 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>.</p> <p>Receives initial and periodic refresher 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 resources to support the purposes of the TAT and 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 and/or TAT Triage Team | <p>When a potential threat report is received, initiates the following intake and triage process.</p> <p><u>Intake</u></p> <p>Obtains basic information about the potential threat, including but not limited to:</p> <ul style="list-style-type: none"> 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. <p>Determines if an imminent threat exists. An imminent threat is indicated by such factors as:</p> <ol style="list-style-type: none"> 1. Subject intends imminent and/or serious harm to self/others; or 2. Subject lacks inhibitions for using violence. <p>If an imminent threat exists, initiates School Emergency Operations and Crisis Response Plan (SEOCR) and notifies law enforcement in accordance with administrative procedure 4:170-AP1, <i>Comprehensive Safety and Security Plan</i>, Part G, School Emergency Operations and Crisis Response Plan (SEOCR).</p> <p>If no imminent threat exists, or once an imminent threat is contained, proceeds to triage.</p> <p><u>Triage</u></p> <p>Triages threat to determine if the full TAT must be involved. Triage may include, as necessary and appropriate:</p> <ul style="list-style-type: none"> 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. <p>Determines if the full TAT must be involved.</p> <p>To determine that the full TAT does not need to be involved, all TAT</p> |

| Actor | Action |
|--------------------|--|
| TAT | <p>Conducts a comprehensive and holistic assessment of the threat using the STEP framework set forth in exhibit 4:190-AP2, E1, <i>Principles of Threat Assessment</i>. See exhibit 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 to assess the threat.</p> <p>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.</p> <p>Documents the threat assessment and classification using exhibit 4:190-AP2, E2, <i>Threat Assessment Documentation</i>, and ensures that TAT documentation follows the acronym FORT:</p> <p>F Fair – sought to understand situations and give individuals an opportunity to be heard and understood;</p> <p>O Objective – sought information based on facts and observations of the case and not speculation or bias;</p> <p>R Reasonable – engaged in responses that were effective and proportionate to the situation; and</p> <p>T Timely – quickly and responsively addressed reports of threatening behavior.</p> |
| Building Principal | <p>Where the TAT classifies the threat as a Moderate, High, or Imminent level of concern and the threat requires further intervention to prevent violence or serious harm, notifies:</p> <ol style="list-style-type: none"> 1. The parent(s)/guardian(s) of any student who is the target/recipient of a threat; and 2. The parent(s)/guardian(s) of any student who engaged in threatening behaviors. |

Responding to and Managing Threats

| Actor | Action |
|-------|---|
| TAT | <p>Identifies appropriate responses to the threat based upon its level. See exhibit 4:190-AP2, E4, <i>Responding to Types of Threats</i>, for examples of responses to each threat level.</p> <p>Develops, implements, and monitors an individualized, fact-based case management plan to intervene with, address, and reduce the threat by:</p> <ul style="list-style-type: none">Designating a TAT member as case manager to monitor the status of the subject and to notify the TAT of any change in status, response to interventions/referrals, or additional information that would be cause for reassessment and/or changes in interventions strategies;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; andUsing the least intrusive interventions and strategies that are sufficient, fair, and reasonable to address the concerns identified. See exhibit 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. <p>Documents this process and any case updates using exhibit 4:190-AP2, E2, <i>Threat Assessment Documentation</i>.</p> <p>Submits updates to the Building Principal regularly, e.g., at least every 30 days, until the case is resolved and the subject no longer poses a threat to the school, its students, or its staff.</p> <p>Maintains documentation in accordance with Board policy, State records laws, and administrative procedures.</p> |

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 administrative procedure 4:170-AP1, *Comprehensive Safety and Security Plan, Part J, Required Notices*.

| Actor | Action |
|----------------------------|--|
| Superintendent or designee | <p>Immediately notifies the LLEA upon receiving a report from any school personnel regarding a verified incident involving:</p> <p>Batteries committed against teachers, teacher personnel, administrative personnel, or educational support personnel. 105 ILCS 5/10-21.7, amended by P.A. 102-894.</p> <p>A firearm in a school or on school-owned or leased property. 105 ILCS 5/10-27.1A(c), amended by P.A.s 103-34, 103-609, and 103-780.</p> <p>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), amended by P.A.s 103-609 and 103-780; 105 ILCS 127/).</p> <p>Reports all of the above incidents to ISBE through its web-based School Incident Reporting System (SIRS) as they occur during the year but no later than July 31 for the preceding school year. 105 ILCS 5/10-27.1A, amended by P.A.s 103-34, 103-609 (first to pass both houses), and 103-780 (second to pass both houses and controlling); 105 ILCS 5/10-27.1B, amended by P.A.s 103-609 (first to pass both houses) and 103-780 (second to pass both houses and controlling); and 105 ILCS 5/10-21.7.</p> |
| Building Principal | <p>Reports to the LLEA threats to the safety and welfare of students and teachers by illegal use of drugs and alcohol, by illegal use or possession of weapons, or by illegal gang activity. 105 ILCS 5/10-21.4a.</p> <p>Reports other threats to the LLEA as necessary and appropriate.</p> <p>Immediately notifies the LLEA upon receiving a report that any person has been observed in possession of a firearm on school grounds (other than a law enforcement official engaged in the conduct of his or her official duties).</p> <p>If the person found to be in possession of a firearm on school grounds is a student, the Building Principal or designee shall also immediately notify the student's parent/guardian. 105 ILCS 5/10-21.7A(b).</p> <p>Reports directly to the ISP within 24 hours of a determination that a student or other person poses a clear and present danger to himself, herself, or others. 430 ILCS 66/105 and 405 ILCS 5/6-103.3; 20 Ill.Admin.Code §1230.120(b). See exhibit 3:60-E, <i>Event Reporting and Notice Requirements for Building Principals Concerning School Safety and Security</i>, for further information.</p> |