

Human Resources
Maurene Stanton
Executive Director of Human Resources

Date: January 7, 2020

To: Stanwood Camano School Board

From: Maurene Stanton

RE: Policy 3225 School-Based Threat Assessment

This is the first reading of Student Policy 3225 School-Based Threat Assessment which has been identified as an essential policy by the Washington State School Directors' Association (WSSDA).

This policy will come before the Board for a second reading on January 21, 2020. If you have any questions regarding this policy please contact me.

Recommendation: That the Board approve new policy 3225 School-Based Threat Assessment.

SCHOOL BASED THREAT ASSESSMENT

The Board is committed to providing a safe and secure learning environment for students and staff. This policy establishes a school-based threat assessment program to provide for timely and methodical school-based threat assessment and management.

Threat assessment best occurs in school climates of safety, respect, and emotional support. Student behavior, rather than a student's demographic or personal characteristics will serve as the basis for a school-based threat assessment.

The threat assessment process is distinct from student discipline procedures. The mere fact that the district is conducting a threat assessment does not by itself necessitate suspension or expulsion and the district will not impose suspension or expulsion, including emergency expulsion, *solely* for investigating student conduct or conducting a threat assessment. Further, suspension, or other removal from the school environment can create the risk of triggering either an immediate or a delayed violent response, unless such actions are coupled with containment and support. However, nothing in this policy precludes district personnel from acting immediately to address an imminent threat, including imposing an emergency expulsion, if the district has sufficient cause to believe that the student's presence poses an immediate and continuing danger to other students or school personnel or an immediate and continuing threat of material and substantial disruption of the educational process.

Structure of Threat Assessment Teams

The superintendent shall establish and ensure the training of a multidisciplinary, multiagency threat assessment team or more than one such team to serve district schools. As the threat assessment team must be multidisciplinary and multiagency, it might include persons with expertise in:

- Counseling, such as a school counselor, a school psychologist and/or school social worker,
- Law enforcement, such as a school resource officer,
- School administration, such as a principal or other senior administrator,
- Other district or school staff,
- Community resources,
- Special education teachers, and a
- Practicing educational staff member.

Not every multidisciplinary team member need participate in every threat assessment. When faced with a potential threat by, or directed towards, a student receiving special education services, the threat assessment team must include a team member who is a special education teacher.

Although parents, guardians, or family members are often interviewed as part of the threat assessment process, neither the student nor the student's family members are part of the threat assessment team. This does not diminish the district's commitment that school personnel will make every reasonable attempt to involve parents and the student in the resolution of the student's behavioral violations, consistent with Policy and Procedure 3241 – Student Discipline.

Function of Threat Assessment Team

Each threat assessment team member, whether a teacher, counselor, school administrator, other school staff, contractor, consultant, volunteer, or other individual, functions as a "school official with a

legitimate educational interest” in educational records controlled and maintained by the district. The district provides the threat assessment team access to educational records as specified by the Family Educational Rights and Privacy Act (FERPA). No member of a threat assessment team, including district / school-based members and community resource / law enforcement members, shall use any student record beyond the prescribed purpose of the threat assessment team or re-disclose records obtained by being a member of the threat assessment team, except as permitted by FERPA.

The threat assessment team:

- Identifies and assesses the behavior of a student that is threatening, or potentially threatening, to self, other students, staff, school visitors, or school property. Threats of self-harm or suicide unaccompanied by threats of harm to others should be promptly evaluated according to the district Suicide Prevention plan.
- Gathers and analyzes information about the student’s behavior to determine a level of concern for the threat. The threat assessment team may conduct 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 evaluate the individual’s threat in context to determine the meaning of the threat and intent of the individual. The threat assessment team may request and obtain records in the district’s possession, including student education, health records, and criminal history record information. The purpose of obtaining information is to evaluate situational variables, rather than the student’s demographic or personal characteristics.
- Determines the nature, duration, and level of severity of the risk and whether reasonable modifications of policies, practices, or procedures will mitigate the risk. The threat assessment team will not base a determination of threat on generalizations or stereotypes. Rather, the threat assessment team makes an individualized assessment, based on reasonable judgment, best available objective evidence, or current medical evidence as applicable;
- Communicates lawfully and ethically with each other, school administrators, and other school staff who have a need to know particular information to support the safety and well-being of the school, its students, and its staff; and
- Timely reports its determination to the superintendent or designee.

Depending on the level of concern determined, the threat assessment team develops and implements intervention strategies to manage the student’s behavior in ways that promote a safe, supportive teaching, and learning environment, without excluding the student from the school.

In cases where the student whose behavior is threatening or potentially threatening also has a disability, the threat assessment team aligns intervention strategies with the student’s individualized education program (IEP) or the student’s plan developed under section 504 of the rehabilitation act of 1973 (section 504 plan) by coordinating with the student’s IEP team or section 504 plan team. Although some of the functions of a school-based threat assessment may run parallel to the functions of a student’s IEP team or 504 plan team, school-based threat assessments remain distinct from those teams and processes.

Data Collection, Review and Reporting

School-Based Threat Assessment

Definitions

For purposes of district or school-based threat assessments of students, the following definitions will apply:

- A **school-based threat assessment** means the formal process, established by a school district, of evaluating the threatening, or potentially threatening, behavior of a student, and the circumstances surrounding the threat, to uncover any facts or evidence that the student or other actor is likely to carry out the threat.
- **School-based threat management** means the development and implementation of a plan to manage or reduce the threatening, or potentially threatening, behavior of a student in a way that increases the physical and psychological safety of students, staff, and visitors, while providing for the education of all students.
- A **threat** is an expression of an intent to cause physical harm to self/others. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means; and 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. Threats may be direct, such as “I am going to beat you up.” or indirect, such as, “I’m going to get him.”
 - A **low risk threat** is one in which it is determined that the individual/situation does not appear to pose a threat of serious harm to self/others, and any exhibited issues/concerns can be resolved easily.
 - A **moderate risk** threat is one in which the person/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 behavior that requires intervention.
 - A **high risk threat** is one in which the person/situation appears to pose a threat of violence, exhibiting behaviors that indicate both a continuing intent to harm self/others and efforts to acquire the capacity to carry out the plan; and may also exhibit other concerning behavior that requires intervention.
 - An **imminent threat** exists when the person/situation appears to pose a clear and immediate threat of serious violence toward self/others that requires containment and action to protect identified or identifiable target(s); and may also exhibit other concerning behaviors that require intervention.

Principles

Six principles form the foundation of the threat assessment process. These principles are:

- Targeted violence is the end result of an understandable, and oftentimes discernible, process of thinking and behavior.
- Targeted violence stems from an interaction among the individual, the situation, the setting, and the target.
- An investigative, skeptical, inquisitive mindset is critical to successful threat assessment.

- Effective threat assessment is based upon facts rather than on characteristics or “traits.”
- An “integrated systems approach” should guide threat assessment inquiries and investigations.
- The central question in a threat assessment inquiry or investigation is whether a student *poses* a threat, not whether the student has made a threat.

Identifying and Reporting Threats

Timely reporting of expression to harm is crucial to an effective school-based threat assessment program.

Anyone, including students, families, and community members may report communication or behavior that appears to be threatening or potentially threatening to a building or district level administrator.

All school district employees, volunteers, and contractors should report immediately to a building or district level administrator any expression of intent to harm another person, concerning communications, or concerning behaviors that suggest an individual may intend to commit an act of violence.

Anyone who believes that a person or situation poses an *imminent* threat of serious violence that requires containment should notify school security and/or law enforcement.

Assessing Threats

A School-based threat assessment is distinct from law enforcement investigation (if any). The goal of the threat assessment process is to take appropriate preventive or corrective measures to maintain a safe and secure school environment, to protect and support potential victims, and to provide assistance, as needed, to the individual being assessed. School-based threat assessment is also distinct from student discipline procedures. However, the functions of school-based threat assessment may run parallel to student discipline procedures.

Triage

The superintendent will designate a team leader for each threat assessment team(s), such as a school principal or a district administrator. If it is not feasible for all team members to be involved with the screening of initial reports referred to the team, the threat assessment team leader may designate a subset of team members to triage cases and determine their appropriateness for review and/or action by the full team. If a team implements a triage process, at least two members of the team will review initial reports and determine if the full team should further assess and manage the situation. All triaged cases must be shared with all members of the assessment team to ensure the cases were adequately addressed. All threat assessment team members shall be trained to triage cases effectively.

Imminent

Upon notification of threatening behavior or communications, the school administrator, threat assessment team, or triage team shall first determine if an imminent threat is believed to exist. If the individual appears to pose an imminent threat of serious violence to themselves or to others in the school, the administrator or assessment team shall notify law enforcement.

Moderate or high risk threat

If the threat assessment team cannot determine with a reasonable degree of confidence that the alleged threat is a not a threat, or is a low risk threat, then the threat assessment team will undertake a more in-depth assessment to determine the nature and degree of any safety concerns and to develop strategies to prevent violence and reduce risk, as necessary.

The threat assessment team's review may include but is not limited to, reviews of records; interviews and consultations with staff, students, family members, community members, and others who know the individual; and interviews of the individual and the target/recipient of the threat(s). The threat assessment team will also screen for risk of self-harm and suicidal ideation, regardless of whether the alleged threat also included possible self-harm.

Upon a determination that a student poses a threat of violence or physical harm to self or others, a threat assessment team shall immediately report its determination to the superintendent or designee. The superintendent or designee shall immediately attempt to notify the student's parent or legal guardian. The district will ensure that the notice is in a language the parent and/or guardian understands, which may require language assistance for parents or guardians with limited-English proficiency under Title VI of the Civil Rights Act of 1964.

In instances where the threat is deemed moderate risk or high risk, or requires further intervention to prevent violence or serious harm, the school administrator shall notify the parent and/or guardian of any student who is the target/recipient of a threat as well as the parent and/or guardian of any student who made the threat. See Policy and Procedure 4314 – Notification of Threats of Violence or Harm. The district will ensure that the notice is in a language the parent and/or guardian understands, which may require language assistance for parents or guardians with limited-English proficiency under Title VI of the Civil Rights Act of 1964.

If the threat assessment team determines that an individual poses a threat of violence, based on the information collected, the threat assessment team develops, implements, and monitors intervention strategies to address, reduce, and mitigate the threat and assistance to those involved, as needed. If these strategies include disciplinary consequences, the district will provide notice to the student and their parents or legal guardian consistent with Student Discipline Policy and Procedure 3241.

The threat assessment team may assist individual(s) within the school to access appropriate school and community-based resources for support and/or further intervention. This includes assisting those who engaged in threatening behavior or communication, and any impacted staff or students.

In cases where the student whose behavior is threatening or potentially threatening also has a disability, the threat assessment team must align intervention strategies with the student's individualized education program (IEP) or the student's plan developed under section 504 of the rehabilitation act of 1973 (section 504 plan) by coordinating with the student's IEP team or section 504 plan team.

No identifiable threat or low risk threat

If the threat assessment team concludes that no further assessment is necessary to determine the reported possible threat is not identifiable or constitutes a low threat of violence or harm to self or others, the threat assessment team need not intervene or take further steps.

Data Collection, Review and Reporting

The superintendent shall establish procedures for collecting and submitting data related to the school-based threat assessment program that comply with OSPI's monitoring requirements, processes, and guidelines.

Adoption Date:
Stanwood-Camano School District
Revised Dates: