The following model policies and procedures are consistent with the requirements of the *Texas Education Code (TEC) 37.115* and reflect research-based best practices. Elements of the procedure that are aligned with *TEC* requirements include a cross-reference to the applicable section of the *TEC*. Please note this document is not to be used as a train the trainer model.

MODEL POLICIES AND PROCEDURES TO ESTABLISH AND TRAIN ON THREAT ASSESSMENT

PURPOSE

As part of the Safe and Supportive School Program, the purpose of this document is to provide model policies and procedures for public school districts and charter schools in establishing and training teams that conduct threat assessment in Texas.

POLICY

The Texas School Safety Center (TxSSC) has worked with the Texas Association of School Boards (TASB) in recommending a school board policy [FFB (LEGAL) & (LOCAL)] for Safe and Supportive School Program Teams. School Boards must adopt LOCAL policies. LEGAL policies are required by law.

DEFINITIONS

- A "**Safe and Supportive School Program Team**" is a team that conducts behavioral threat assessments by assessing and reporting individuals who make threats of violence or exhibit harmful, threatening, or violent behavior and who gathers and analyzes data to determine the level of risk and appropriate intervention. The team serves as a safety net for the community and school by:

  1. Conducting a fact-based, systematic, and investigative approach to determining how likely a person is to carry out a threat of violence.
  2. Identifying, assessing, and managing appropriate interventions of individuals who are at risk for violence against themselves and others.
  3. Providing guidance to students and school employees on recognizing harmful, threatening, or violent behavior that may pose a threat to the community, school, or individual.

  When conducting this process with fidelity it leads to a positive and safe school climate. This process is not intended to be punitive or adversarial; rather, it is a way to build trust and situational awareness.

- "**Harmful, threatening, or violent behavior**" includes behaviors such as verbal threats, threats of self-harm, bullying, cyberbullying, fighting, the use or possession of a weapon, sexual assault, sexual harassment, dating violence, stalking, or assault, by a student. [TEC 37.115(a)(1)]

- "**Team**" means a Safe and Supportive School Program Team established by the board of trusteesof a school district. [TEC 37.115(a)(2)]
- A "**threat**" is a concerning communication or behavior that indicates that an individual poses a danger to the safety of school staff or students through acts of violence or other behavior that would cause harm to self or others. The threat may be 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.

SAFE AND SUPPORTIVE SCHOOL PROGRAM TEAM

- The board of trustees of each school district shall establish a Safe and Supportive School Program Team to serve at each campus of the district. [TEC 37.115(c)]
- The superintendent of the district shall ensure, to the greatest extent practicable, that the members appointed to each team have expertise in counseling, behavior management, mental health and substance use, classroom instruction, special education, school administration, school safety and security, emergency management, and law enforcement. [TEC 37.115(d)]
- A team may serve more than one campus of a school district, provided that each district campus is assigned a team. [TEC 37.115(d)]
- Each team must report required information regarding the team's activities to TEA. [TEC 37.115(k)]
- The superintendent of a school district **may** establish a committee or assign to an existing committee established by the district, the duty to oversee the operations of teams established for the district. A committee with oversight responsibility must include members with expertise in human resources, education, special education, counseling, behavior management, school administration, mental health and substance use, school safety and security, emergency management, and law enforcement. [TEC 37.115(e)]
- Team members shall work collaboratively with each other, with other school staff, and (as appropriate) with community resources to support the purposes of the team and the safety of the school and its students and staff.
- All team members should be involved with the assessment and intervention of individuals whose behavior poses a threat to the safety of school staff or students.
- Team members shall actively, lawfully, and ethically communicate with each other; with school administrators; and with other school staff who need to know specific information to support the safety and well-being of the school, students, and staff.
- Each team shall conduct a threat assessment that includes:
  1. Assessing and reporting individuals who make threats of violence or exhibit harmful, threating, or violent behavior. [TEC 37.115(f)(1)(a)]
  2. Gathering and analyzing data to determine the level of risk and appropriate intervention, including referring a student for mental health assessment, and implementing an escalation procedure (if appropriate). [TEC 37.115(f)(1)(b)]

- Each team shall:
    1. Provide guidance to students and school employees on recognizing harmful, threatening, or violent behavior that may pose a threat to the community, school, or individual. [TEC 37.115(f)(2)]
    2. Support the district in implementing the district's multi-hazard emergency operations plan. [TEC 37.115(f)(3)]
    3. Report immediately to the superintendent a team's determination that a student or other individual poses a serious risk of violence to self or others. [TEC 37.115(h)]
    4. Act in accordance with the district's suicide prevention program upon identifying a student at risk of suicide. [TEC 37.115(i)]
    5. Act in accordance with the district policies and procedures related to substance use prevention and intervention upon identifying a student using or possessing tobacco, drugs, or alcohol. [TEC 37.115(j)]
- A team may not provide a mental health care service to a student who is under 18 without written consent from the parent of or person standing in parental relation to the student. [TEC 37.115(g)]

BUILDING A THREAT ASSESSEMENT PROGRAM—8 STEPS

Step One: Create and promote safe school climates
- Assess current school climate
- Enhance current school climate
- Strengthen students' connectedness

Step Two: Establish a multidisciplinary team
- Name it the Safe and Supportive School Program Team
- Identify team membership
- Designate a team leader
- Establish team procedures and protocols
- Meet on a regular basis and as needed

Step Three: Define prohibited and concerning behaviors
- Establish policy defining prohibited behaviors
- Identify other behaviors for screening or intervention
- Define threshold for intervention

Step Four: Create a central reporting mechanism
- Establish one or more anonymous reporting mechanisms
- Provide training and guidance to encourage reporting
- Ensure availability to respond
- Establish trust that reports will be acted upon

Step Five: Determine threshold for law enforcement intervention
- Most reports can be handled by school-based team
- Establish which behaviors should be referred for law enforcement intervention

Step Six: Establish threat assessment procedures
- Decide how to document cases
- Create procedures to screen reports
- Establish procedures for gathering information
- Organize information around 11 Investigative Questions
- Make assessment and decide on intervention

Step Seven: Develop risk management options
- Identify all available resources for creating individualized management plans
- Identify resources to assist targets/victims
- Establish points of contact for all resources

Step Eight: Conduct training for all stakeholders
- Training for threat assessment team
- Training for students, staff, and parents
- Training for students, staff, and community stakeholders to anonymously report dangerous, violent, or unlawful activity

<mark>THREAT ASSESSMENT PROCEDURES</mark>
- Receive report about an individual of concern. Screen for imminency (of the threat or other concern) and whether there is a need for a full threat assessment.
- If the team believes the report **does** present an **imminent danger or safety concern**:
  - Immediately notify law enforcement.
  - Once the emergency has been contained, the team should complete a full threat assessment.
  - If report involves a student, the team should notify the superintendent who will notify the parent or guardian. [TEC 37.115(h)]
  - If report involves a student at risk of suicide, team shall conduct a full threat assessment in addition to actions taken in accordance with the district's suicide prevention program. [TEC 37.115(i)]
  - Make other notifications (i.e., anyone that is or may be directly impacted).
  OR
  If the team **does not** believe the report presents an **imminent danger or safety concern**, determine if there is a need for a full threat assessment.
  - If not, document initial report and screening and add information to threat assessment database.
  - If there is, proceed with a full threat assessment using steps below.

- If a report involves sexual harassment, sexual assault, dating violence, stalking, or a domestic violence assault, notify the District's Title IX Coordinator immediately.
- If the student has a Functional Behavior Assessment (FBA)/Behavior Intervention Plan (BIP), 504 Plan, Individualized Education Program (IEP), and/or health plan, notify the school staff who manage the student's plan(s) to see if this is a known baseline behavior. If not, continue with this process.
- Gather information about the person and situation from various sources, including an internet search.
- Organize and analyze information using the 11 investigative questions detailed in the U.S. Secret Service and U.S. Department of Education threat assessment guide. [Threat Assessment In Schools: A Guide to Managing Threatening Situations And To Creating Safe School Climates]
- Make assessment about whether the individual of concern **poses** a threat of violence or self-harm, or if they are otherwise in need of intervention.
- Develop and implement a case management plan to reduce risk.
- As needed, refer individual of concern to the local mental health authority or healthcare provider for evaluation and/or treatment.
- As needed, refer individual of concern for a full and individual evaluation (FIE) for special education services.
- Monitor, re-evaluate, and modify plan as needed to ensure that the identified intervention(s) is effective, and the individual of concern no longer poses a threat of violence or self-harm.

TRAINING

- Each team must complete training provided by the TxSSC or a regional education service center (ESC). [TEC 37.115(c)]
- On a regular basis, each district should monitor its team membership and quickly replace and train new members as needed.
- Districts should develop a system to ensure all stakeholders receive training on a continual basis.
- If a District or Charter school chooses to contract with a provider to deliver training for their District and/or multiple campus teams, the Texas School Safety Center recommends that training be based on the U.S. Secret Service and Department of Education model (i.e., SIGMA Threat Management Associates LLC, Salem-Keizer Threat Assessment System, Comprehensive School Threat Assessment Guidelines, Virginia Model for Student Threat Assessment).