Calvert County Public Schools
1305 Dares Beach Road
Prince Frederick, MD 20678

Administrative Procedures for Policy 1480.1 Administration
Regarding Behavioral Threat Assessment

I. Purpose

   A. To establish procedures for the reporting, assessment and/or intervention of a student, staff, contractor or visitor who may pose a threat to the safety of themselves and/or any individual(s) attending or working in our schools.

II. Definitions

   A. 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 low-risk threat may be handled by the ordinary school disciplinary process at the discretion of the school administration.

   B. A moderate risk threat is one in which the person/situation does not appear to pose a threat of 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 moderate risk threat may also involve a parallel school disciplinary process.

   C. A high-risk threat is one in which the person/situation appears to pose a threat of serious harm, 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 behavior that requires intervention. A high-risk threat may also involve a parallel school disciplinary process.

   D. An imminent threat exists when the person/situation appears to pose a clear and immediate threat of serious violence toward others that requires containment and action to protect identified or identifiable target(s); and may also exhibit other concerning behavior that require intervention.

   E. A behavioral threat assessment is a structured group process used to identify, assess, and manage the risk of threats of targeted violence posed by an individual or group.

   F. The Mental Health Coordinator is responsible for coordinating existing mental health services and referral procedures for mental health services. The Coordinator should work in collaboration with local departments of health and social services as well as school-based personnel.

III. Structure and Function of Threat Assessment Teams

   A. Individuals on the Team

       1. Mental health professional who has expertise in counseling (school counselor, school psychologist or school social worker)

2. School administration (principal, assistant principal, or human resources professional)

3. Teacher or administrator with instructional experience

4. Safety advocate (middle and high schools)

5. Law enforcement

6. A representative with expertise in special education should be included as a member of the threat assessment team when faced with a threat made by, or directed towards, a student(s) receiving special education services

B. Structure of the Team

1. Establish a team leader – typically the school administrator for a threat to others and a mental health professional for threat to self

2. Team members shall work collaboratively with each other, with other school staff, and as appropriate with community agencies to support the purposes of the team and the safety of the school and its students and staff.

3. The team leader may designate a subset of team members to triage cases reported to the team. If the team elects to triage the case, at least two members of the team will review initial reports of concern to determine if existing resources and mechanisms are enough to address those concerns or whether the full team should further assess and manage the situation. All members of the team should have the opportunity to review triaged cases to ensure they have been adequately addressed.

4. Unless it is not feasible to do so, 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.

5. Team members shall actively, lawfully, and ethically communicate with each other; with school administrators; and with 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.

C. Other Duties of the Assessment Team

1. Each assessment team shall:

   a. Provide guidance to students and staff regarding recognition of threatening behavior that may represent a threat to the community, school, or self;

   b. Identify members of the school community to whom threatening behavior should be reported;

   c. Implement CCPS policies for the assessment of and intervention with individuals whose behavior poses a threat to the safety of school staff or students.

   d. In cases where determined to be appropriate, assessment teams shall follow established procedures for referrals for evaluation or treatment.

e. Regardless of threat assessment activities, disciplinary action and referral to law enforcement are to occur as required by CCPS policies and regulations, the Maryland Code, and COMAR.

IV. Procedures

A. Identifying and Reporting Threats

1. 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 assist, as needed, the individual being assessed. Regardless of threat assessment activities, disciplinary action and referral to law enforcement must occur when required by CCPS policy or as otherwise established in Maryland law or regulations.

   a. Upon having knowledge or suspicion of a threat, all school system employees, volunteers, and contractors should report immediately to the designated school 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.

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

   c. In addition, the school administrator shall report all the above threats and other threats to local law enforcement agencies as determined to be necessary.

   d. The school administrator shall immediately report any act noted above that may constitute a criminal offense to the parents and/or guardians of any minor student who is alleged to have committed the act and shall report that the incident has been reported to local law enforcement. The school administrator shall inform the parents and/or guardians that they may contact local law enforcement for further information, if they so desire.

   e. The school administrator shall contact the Director of Student Services or designee (Mental Health Coordinator) by completing and submitting the CCPS Threat Assessment Form. If the threat is determined to be high or imminent, the school administrator shall contact the Director of Student Services or designee by phone

B. Assessing Threats

1. When a threat is reported, the school administrator and/or threat assessment team leader, in conjunction with a mental health professional, shall initiate an inquiry/triage and, in consultation with the threat assessment team, make a determination of the seriousness of the threat as expeditiously as possible.

2. Upon notification of threatening behavior or communications, the school administrator, threat assessment team, or triage team shall 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 follow their crisis plan in accordance with Calvert County Public School System Policy 1500.

3. In accordance with the Maryland State Department of Education's "Emergency Planning Guidelines for Local School Systems and Schools" (October 2017), school responses may include actions such as evacuation, lockdown, and shelter-in-place.   If there is no imminent threat present, or once such an imminent threat is contained, the threat assessment team leader shall, in conjunction with the mental health professional determine if the full threat assessment team needs to be involved. This triage may include (as necessary and appropriate):

   a. Review of the threatening behavior or communication.

   b. Review of school and other records for any prior history or interventions with the individual(s) involved.

   c. Conducting timely and thorough interviews (as necessary) 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, so that the meaning of the threat and intent of the individual can be determined.

   d. If it is determined that the threat is not identifiable or a low threat of violence or harm to self or others, and the threat assessment team determines that no further assessment, intervention, or monitoring is required at the time to prevent violence:

      1) The threat assessment team leader shall ensure that the incident and review is adequately documented consistent with CCPS processes, forms and procedures. The threat assessment team shall maintain the documentation in accordance with this procedure, or as otherwise required by State law.

      2) If the individual (about whom the report was made) does not pose a threat but could benefit from or is in need of some additional assistance, the threat assessment team leader shall ensure that the individual is referred to the Mental Health Coordinator for appropriate school or community-based resources.

      3) If the individual (about whom the report was made) has an IEP or 504 Plan, a Functional Behavioral Assessment (FBA) should be considered. Based upon the FBA, a Behavior Intervention Plan (BIP) should be developed, if warranted.

   e. If it cannot be determined with a reasonable degree of confidence that the alleged threat is not a threat, or is a low risk threat, then a more in-depth assessment is to be undertaken by the threat assessment team to determine the nature and degree of any safety concerns and to develop

strategies to prevent violence and reduce risk, as necessary. The assessment may include but not be limited to, review of records; interviews and consultations with staff, students or community who know the individual; and interviews of the individual and the target/recipient of the threat(s).

    f.   Based on the information collected, the school threat assessment team shall determine strategies to mitigate the threat and provide intervention and assistance to those involved, as needed.

    g.   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 or designee 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.

    h.   In cases involving unsubstantiated/low risk threats, the school administrator or designee should notify the parent and/or guardian of any student who is the target/recipient of a threat and/or shall notify the parent and/or guardian of any student who made the threat.

C.   Intervening, Monitoring, Resolving, and Documenting Threats

    1.   If it is determined that an individual poses a threat of violence, the threat assessment team shall develop, implement, and monitor an individualized case management plan to intervene with, address and reduce the threat. The threat assessment team shall maintain documentation in accordance with these procedures.

    2.   The threat assessment team shall assist individual(s) within the school who engaged in threatening behavior or communication, and any impacted staff or students, in accessing appropriate school and community-based resources for support and/or further intervention. The Mental Health Coordinator can be contacted to assist with resources.

    3.   For each case that is determined to be moderate, high, or imminent, a member of the threat assessment team shall be designated as a case manager to monitor the status of the individual(s) of concern (in that case) and to notify the threat assessment team of any change in status, response to intervention/referrals, or additional information that would be cause for a re-assessment and changes in intervention strategies. Updates regarding the case are to be documented in accordance with these procedures. These updates are to be submitted regularly (e.g., at least every 30 days) to the Mental Health Coordinator until the case is resolved and is no longer determined to pose a threat to the school or its staff or students.

    4.   Resolution and closure of the case is to be documented in accordance with these procedures.

    5.   Threat Assessment Teams will use the Calvert County Public Schools documents.

6. Updates shall be shared at monthly Threat Assessment Team meetings as needed.

7. The documents shall be completed and maintained in a separate confidential file with the Principal. Copies of the assessment shall be sent to the Department of Student Services (Mental Health Coordinator).

V. THREATS OF VIOLENCE ACCOMPANIED BY THREATS OF SELF-HARM

A. When a threat assessment team is investigating a student, who is threatening to harm others, the threat assessment team shall also screen for risk of self-harm and suicidal ideation. Threats of self-harm or suicide unaccompanied by threats of harm to others should be promptly evaluated pursuant to existing CCPS protocols on suicide intervention (#1480.2). The threat assessment team shall work collaboratively with other entities involved in the case.

VI. SCHOOL THREAT ASSESSMENT GUIDELINES

A. PRINCIPLES OF THREAT ASSESSMENT

1. Threat assessment is a systematic process that is designed to:

   a. Identify individual(s)/situation(s) whose behavior(s) causes concern for violence

   b. Gather additional relevant information in a lawful and ethical manner

   c. Assess the individual(s)/situation(s) in context based on all information available

   d. Manage the individual(s)/situation(s) to prevent violence and mitigate impact of harm

2. The appraisal of risk in a threat assessment focuses on actions/behaviors, communications, and specific circumstances that might suggest that an individual intends to engage in violence and is planning or preparing for that event. The threat assessment process is centered upon an analysis of the known (or reasonably knowable) behavior(s) in a given situation.

B. IDENTIFYING AND REPORTING THREATS

1. All school system employees, volunteers, and contractors are required to report immediately to the school administrator or designee any expression of intent to harm another person, concerning communications, or concerning behaviors that suggest an individual may intend to commit an act of targeted violence.

2. The school threat assessment team shall strive to make the reporting process both understandable and highly accessible and to discourage a "code of silence" that may be a barrier to reporting. Faculty and staff, students, volunteers, and other members of the school community need to know:

   a. their role and responsibility to report concerns;

   b. what to report;

   c. where and how to report it;

d. that reports are wanted and will be acted upon appropriately.

3. Members of the school community should be encouraged on an ongoing basis to report any threatening communication or troubling behavior and be reminded that reporting is an act of caring and not "snitching" or "tattling."

4. Anyone who believes that a person or situation poses a clear and immediate threat of violence that requires containment should notify school security and law enforcement in accordance with school system policies on critical incident response.

VII. CLASSIFYING THREATS

A. Key Areas of Questioning

1. The following are examples of key areas of questioning to help assess the situation. Note that this is not intended as an exhaustive or complete list of areas of inquiry. Additional questions may be asked for clarification and/or to probe more deeply to fully understand the circumstances.

2. Before conducting an interview with an individual of concern:

a. threat assessment team members should be well acquainted with the facts that brought the individual to the attention of school administrators and others and,

b. team members should review available information concerning the individual's background, interests, and behaviors.

B. Interview with threat recipient(s)/target(s) and witness(es): Individuals who have been identified as potential targets of the subject of concern should also be interviewed, where possible, along with any persons who witnessed the concerning behavior. The threat assessment team should inform the subject of the interview that the primary purpose of that interview is to gather information about a possible situation of concern and, where possible, prevent harm to staff or students.

1. A potential target should be asked about their relationship to the subject of concern and queried about recent interactions with that subject. The interviewer should gather information about grievances and grudges that the subject of concern may hold against a target or against others. Interviews with potential targets should be conducted with special sensitivity. Care must be taken to gather information without unduly alarming a potential target. If the threat assessment team believes that there may be a risk of violence to an identified target, that target should be offered assistance and support for their safety.

2. The assessment process facilitates increased and revised understanding of issues over time. That is, when new information is made available to the team during or after the initial assessment, the team should review the new information and re-evaluate the threat accordingly. The team will want to maintain contact with the target/recipient to obtain information about any further behaviors of concern, improvements in the situation or other relevant developments.

C. Review of records/consultation with staff members who know the individual best: Background information can inform the threat assessment team's approach to and questioning of the individual. This information may help the threat assessment team determine whether the student poses a threat to particular targets. In addition, knowledge of background information concerning the student prior to the interview may help the threat assessment team judge whether the individual is forthcoming and straightforward. Some areas for background information from records and consultation with adults in school who know the subject best include:

1. Recent (and perhaps historical) work or school performance history

2. Disciplinary or personnel actions

3. Prior threat assessment team contacts

4. Other social and emotional interventions

5. Law enforcement or security contacts at school and in the community

6. Other relevant background information

7. Presence of known problems in the life of the individual

8. Current or historical grievances that may be related to the behavior of concern

9. Online searches: internet, social media, email, etc.

NOTE: Additional consent may be required to obtain information from the records referenced above in compliance with applicable State and / or federal law

D. Interview with Students or Staff of Concern: Generally, an individual who is part of the school (staff or student) should be asked directly about his or her actions and intentions. Many subjects will respond forthrightly to direct questions approached in a non-judgmental manner. An interview conducted during a threat assessment inquiry can elicit important information that permits the threat assessment team to better understand the situation of the individual and possible targets. This understanding, in turn, will help the threat assessment team to assess the risk of violence that the individual may pose in a given situation. Interviews with the individual of concern also can generate leads for further inquiry.

1. An interview can also send the message to the individual that his or her behavior has been noticed and has caused concern. Interviews give individuals of concern the opportunity to tell their perspectives, background and intent; to be heard and experience support/empathy where appropriate; and to reassess and redirect their behavior away from activities that are of concern. The interview may suggest to a subject who has mixed feelings about attacking, that there are people who are interested in his or her welfare, and that there are better, more effective ways to deal with problems or with specific people.

2. Although an interview with a subject of concern can provide valuable information, relying too heavily (or solely) on that interview as a basis for making judgments about whether that subject poses a threat is likely to present problems. The information offered by the subject may be incomplete,

misleading, or inaccurate. It therefore is important to collect information to corroborate and verify information learned from the interview.

      3. Interviews, or attempts to conduct an interview should be documented on threat assessment documents.

VIII.   Assessing Potential Threatening Behavior

     A. Information gathered in a threat assessment inquiry should be examined for evidence of behavior and conditions that suggest that the individual of concern is planning and preparing for an act of violence or to cause harm to self or others. Based on a review of the totality of the information available, the threat assessment team should seek to answer the following questions:

        1. What is the individual's motive(s) and goals? / What first brought him/her to someone's attention?

          a. Does the individual have a major grievance or grudge? Against whom?

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

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

          d. Does the individual feel that any part of the problem is resolved or see any alternatives?

          e. Has the individual previously come to someone's attention or raised concern in a way that suggested he or she needs intervention or supportive services?

        2. Have there been any communications suggesting ideas, intent, planning or preparation for violence?

          a. What, if anything, has the individual communicated to someone else (targets, friends, coworkers, others) or written in a diary, journal, email, or website concerning his or her grievances, ideas and/or intentions?

          b. Do the communications provide insight about ideation, planning, preparation, timing, grievances, etc.?

          c. Has anyone been alerted, pre-informed, or otherwise made privy to an intended act of violence?

        3. Has the individual shown any inappropriate interest in, fascination, and/or identification with other incidents of mass or targeted violence (e.g., terrorism, rampage violence, school/workplace shootings, mass murderers):

          a. Previous perpetrators of targeted violence

          b. Grievances of perpetrators

          c. Weapons / tactics of perpetrators

          d. Effect or notoriety of perpetrators

4. Does the individual have (or are they developing) the capacity to carry out an act of targeted violence?

   a. How organized is the individual's thinking and behavior?

   b. Does the individual have the means, methods, opportunities or proximity (e.g., access to a weapon) to carry out an attack?

   c. Does the individual have a known history of violence?

   d. Are they trying to get the means to carry out an attack?

   e. Have they developed the will and the ability to cause harm?

   f. Are they practicing or rehearsing for the violence?

   g. What is the "intensity of effort" expended in attempting to develop the capability?

   h. Has the individual expressed homicidal ideation or attempted homicide?

5. Is the individual experiencing hopelessness, desperation, and/or despair?

   a. Is there information to suggest that the individual is feeling desperation and/or despair?

   b. Has the individual experienced a recent failure, loss and/or loss of status?

   c. Is the individual having significant difficulty coping with a stressful event?

   d. Has the individual expressed suicidal ideation or attempted suicide?

6. Does the individual have a positive, trusting, sustained relationship with at least one responsible person?

   a. Does the individual have at least one friend, colleague, family member, or another person that he or she trusts and can rely upon for support, guidance or assistance?

   b. Is that trusted person someone that would work collaboratively with the team for the wellbeing of the individual of concern?

   c. Is the individual emotionally connected to other people or becoming more socially isolated?

   d. Has the individual experienced a loss of a trusted individual, or is a relationship with a trusted individual in jeopardy?

7. Does the individual see violence as an acceptable, desirable – or the only – way to solve a problem?

   a. Does the individual perceive alternatives to violence to address their grievances?

b. Does the individual's environment (friends, colleagues, family members, others) explicitly or implicitly support or endorse violence as a way of resolving problems or disputes?

   c. Has the individual been "dared" by others to engage in an act of violence?

   d. Has the individual expressed sentiments of finality or desperation to address grievances?

8. Are the individual's conversation and "story" consistent with his or her actions?

   a. Does information from collateral interviews and from the individual's own behavior confirm or dispute what the individual says is going on and how they are dealing with it?

   b. Is there corroboration across sources or are the individual's statements at odds with their actions?

9. Are other people concerned about the individual's potential for violence?

   a. Are others familiar with the individual concerned that he or she might take action based on violent ideas or plans?

   b. Are those familiar with the individual concerned about a specific target?

   c. Are other people around the individual expressing fear, or engaging in protective actions (e.g., distancing, avoiding, minimizing conflict, etc.)

10. What circumstances might affect the likelihood of an escalation to violent behavior?

   a. What events or situations in the individual's life (currently or in the near future) may increase or decrease the likelihood that the individual will engage in violent behavior?

   b. Are threat assessment team interventions escalating, de-escalating, or having no effect on movement toward violence?

   c. What is the response of others who know about the individual's ideas or plans?

      1) Actively discourage subject from acting violently,

      2) Encourage the subject to attack,

      3) Deny the possibility of violence,

      4) Colluding with, or passively supporting an attack, etc.?

B. Thoughtful consideration of the answers to the above key questions will produce a sound foundation for the threat assessment team's response to the overarching question in a threat assessment inquiry:

IX. Does the individual of concern pose a threat of targeted violence toward the school or its staff or students?

   A. Classifying Threats to Determine Response Strategies

1. The threat assessment is designed to identify and assess risks in a deliberate and thorough manner. In determining response strategies to mitigate the risk and to provide assistance, as needed, it is helpful to classify threats by level. Based on the information collected, the threat assessment team may classify threats using the following basic criteria:

Threat Levels	Criteria
Low risk threat	Individual/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	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.
High risk threat	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 and efforts to acquire the capacity to carry out the plan; and may also exhibit other concerning behavior that requires intervention.
Imminent threat	The person/situation appears to pose a clear and immediate threat of serious violence towards others that requires containment and action to protect identified or identifiable target(s); and may also exhibit other concerning behavior that requires intervention.

B. Documentation

1. Effective threat assessment and management efforts are accompanied by thorough documentation that demonstrates the team's good faith efforts to identify, investigate, assess, and manage threatening situations. The team can remember this with the acronym FORT: Engage in actions and accompanying documentation that demonstrates that the team was:

   a. F: FAIR – sought to understand situations and give individuals an opportunity to be heard and understood

   b. O: OBJECTIVE – sought information based on facts and observations of the case and not speculation or bias

   c. R: REASONABLE – engaged in responses that were effective and proportionate to the situation, and

   d. T: TIMELY – quickly and responsively addresses reports of threatening behavior (Source: © G. Deisinger (1996)).

X. RESPONDING TO AND MANAGING THREATENING SITUATIONS

A. Effective case management integrates interventions, where appropriate and feasible, across the (relevant) domains:

1. S De-escalate, contain, or control the subject who may take violent action;

2. T Decrease vulnerabilities of the target;

3. E Modify physical and cultural environment and systems to discourage escalation; and,

4. P Prepare for and mitigate against precipitating events that may trigger adverse reactions.

B. If it is determined that the student poses a threat of violence, the threat assessment team shall develop, implement, and monitor an individualized plan to intervene and reduce the threat. (Source: © G. Deisinger & M. Randazzo, SIGMA Threat Management Associates (2008)).

C. Develop an individualized case management plan based on information gathered through the assessment. The plan must be fact-based and person/situation specific. Keep in mind that engagement (i.e., direct communication, empathy, support, and confrontation) can be very helpful with an individual of concern from within school communities, even when dealing with someone who is very angry. The more isolated they become the more difficult it is to assess, intervene with and monitor their response to interventions. Of course, personalities and worldviews matter, so sometimes teams have to carefully consider who will be the point of contact with the individual of concern, not only in terms of their personality, but also their skills and willingness to support the goals of the threat management process. Generally speaking, it is best to use the least intrusive interventions and/or strategies that are likely to be effective with the situation at hand.

XI. Subject-based strategies or interventions

A. Schools regularly use many of the following interventions and/or strategies to address inappropriate behavior including, but not limited to, threatening behavior. The focus is on interventions that de-escalate, contain, control, redirect the subject away from plans and preparation for violence; and toward engaging with others, problem solving, adapting, and improving their coping skills and well-being. Examples of subject-based strategies or interventions include, but are not limited to:

1. Maintain channel of communication and engagement (with subject) to:

   a. Gather information,

   b. Build rapport and relationship

   c. Decrease isolation

   d. De-escalate volatile reactions

   e. Provide feedback & mentoring

   f. Monitor reactions to grievances, interventions and precipitating events.

2. Problem solving about legitimate grievances;

3. Referral for assistance or support services:

   a. Academic assistance or accommodations

b. Social skills training

c. Behavioral contracting

d. Modifications of student classroom assignment or schedule

e. Modification of work schedule or assignments

f. Alternative schooling

g. Involvement in extracurricular activities

h. Performance improvement plans

i. Peer coaching/mentoring

4. Counseling/mental health services:

a. Check-in/check-out with school counseling staff

b. Outpatient counseling/mental health care

c. Emergency psychiatric evaluation

5. Disciplinary measures:

a. Subject confrontation or warning;

b. Administrative orders for no contact or communication

c. Parental involvement

d. In school detention /after-school detention

e. Suspension

f. Removal and alternative placement

B. The selected interventions and/or strategies should be the ones with the greatest potential for addressing short-term crises as well as longer-term prevention. While holding students and staff accountable for their actions, school administrators must be fair and reasonable in disciplinary responses. A broad range of corrective disciplinary actions may be employed including admonition and counseling, behavioral contracts, after-school or in-school detention, and suspension of student privileges for a specified period. These disciplinary responses may be combined with other actions such as parent conferences, modifications of student classroom assignment or schedule, and referrals to in-school and community-based programs such as mediation and community service.

C. It is important for threat assessment teams to recognize that even reasonable discipline can be perceived as another grievance to which the subject may react. In such cases, the disciplinary response could lead to escalation in threatening behavior. The most punitive responses may or may not prevent acts of violence. 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. A student who is suspended may conclude: "I have lost everything. I have only a short time to act. I will give them what they deserve." In addition, a student who is suspended is often under less supervision than if he or she were to remain in a school setting.

D. That is not a reason to withhold appropriate consequences for inappropriate behavior, but rather when the situation arises, for threat assessment teams to have considered and planned for those responses. Administrative leave, suspension, expulsion, or termination options that focus solely on accountability and controlling the person do not address the ongoing challenges of:

    1. Moving the person away from thoughts & plans of, and capacity for, violence and/or disruption;

    2. Connecting the person to resources (where needed);

    3. Mitigating organizational/systemic factors;

    4. Monitoring person when they are no longer connected to an organization.

E. Use separation strategies with intentionality, awareness of limitations, and anticipation of consequences.

F. Although detaining a subject may be necessary in a particular situation, without careful attention to the need for confinement, weapons removal, or interpersonal intervention, that action may be insufficient to prevent violence at school or otherwise protect a target. Similarly, referring a subject to the mental health system, without seeing that referral in the context of an overall monitoring/management plan, may not be sufficient to prevent violence. Singular interventions tend to not be sufficient to address complex and ongoing situations.

XII. Target-Based Case Management Strategies

A. In addition to interventions focused on addressing the behavior of the individual(s) of concern, effective threat management teams also attempt to minimize risk and negative impact on identified or identifiable targets and seek to maintain contact (where appropriate) to help monitor the actions and impact of the subject of concern. Examples of target-based case management strategies include (but are not limited to):

    1. Coaching regarding personal safety approaches in dealing with the individual of concern:

        a. Clear statements to the individual:

            1) Relationship/contact is unwanted

            2) Stop all contact and/or communication

        b. Avoid subsequent contact/response

        c. Document all further contacts

        d. Do not engage emotionally, monitor "buttons" getting pushed

    2. Minimize publicly available information

        a. Scrub internet information

        b. Check privacy settings on social media applications

    3. Maintain awareness of surroundings

    4. Vary routine

5. Develop contingency plans for escape, shelter, support

6. Encourage use of support systems

    a. Counseling/mental services

    b. Victim assistance programs

XIII. Environmental / Systemic Case Management Strategies

A. In addition to addressing interventions with the subject of concern and target, effective teams also take a holistic view of the situation, monitoring for underlying systemic causes that may be contributing not just to a given case, but perhaps to a range of cases over time. This level of intervention is about group and sub-group behavior, not just that of the subject of concern or target. Strategies may include:

    1. Address systemic, policy or procedural problems that may serve as precipitating events across cases

    2. Bullying prevention / intervention programs

    3. Enhance school/workplace climate – build and support a caring community

    4. Intervene with associates that support or encourage violent behavior

    5. Enhance conflict management skills of sub-groups

    6. Identify and address gaps in awareness of reporting and intervention options

    7. Identify and address gaps in threat assessment & management process

XIV. Monitoring for the Impact of Precipitating Events on Case Management

A. The threat assessment team members recognize that cases do not occur in a vacuum and that life continues while they are assessing and intervening with a given case. The team maintains an ongoing, longitudinal approach to anticipating, monitoring for, and (to the extent possible) managing the impact of potential precipitating events such as:

    1. Loss impacting the individual

        a. Job or income;

        b. Status;

        c. Significant other/relationship;

        d. Health;

        e. Rejection / Ostracization;

    2. Injustice;

    3. Implementation of administrative notices / court orders;

    4. Violation of administrative notices / court order

    5. Anniversary events, e.g.:

        a. Date of beginning of relationship

        b. Date of end of relationship

c. Date served with court orders/separation documents

d. Birthdays

e. Holidays

6. Contagion effect of other high profile or locally significant acts of violence

XV. BUILDING CONSISTENCY BETWEEN THREAT ASSESSMENT AND MANAGEMENT

A. Based on an individualized assessment of the risk or priority of the case, teams will engage case management strategies that are sufficient and reasonable to address the concerns identified. For each general threat level there is a minimal level of response or case management that is appropriate. Keep in mind that these are general guidelines to prompt consideration of a starting point in developing a case management strategy. A given case may have a fact pattern that necessitates deviation from the general guidelines. Where that is the case, teams should deliberate, reach consensus upon action steps, and document the facts or circumstances that factored into their case management planning. Following are examples of options and considerations for case management for the various levels of threat:

1. Examples of Low Risk Threat Responses

a. The response to a low risk threat depends on the context of the threat, whether the threat requires some form of disciplinary action, and what is necessary to resolve the situation. Some low threat cases are generated from a misunderstanding of what was communicated, something taken out of context, or a statement made in the heat of the moment but with no actions to indicate intent to cause harm. Many low risk threats are resolved with a clarification, explanation, retraction and/or an apology – all of which (in conjunction with the absence of any other behaviors of concern) indicates that the threat is non-existent or minimal and is over. School administrators should generally consider the following:

1) Low risk threats by definition do not appear to pose a threat and can be easily resolved. When the person to whom the threat was directed is a student, his/her parents or guardian must be notified by the school administration. When parents of a threatened student are notified, they should be contacted promptly and reassured that the threat has been resolved.

2) Parents of the student engaging in the low risk threatening behavior must also be notified so they are aware of the situation and that it has been resolved. Some low risk threats may be subject to disciplinary action based on CCPS policy. The parent or guardian of the subject student is to be notified of the incident and of the disciplinary action taken. All relevant disciplinary due processes should be followed.

3) When the threat assessment team determines a threat to be low risk, the case may be resolved entirely with no further action or resolved with referral to appropriate school or

community-based resources. When subjects are referred for resources or services, a member of the threat assessment team may be designated to monitor the subject's reactions for a short period of time, and that the referral was made effectively.

4) If new information comes to the attention of the team, re-assess and update the case management plan.

2. Examples of Moderate Risk Threat Responses

a. A moderate risk threat will result in notifying the intended target(s) of the threat and taking precautions to protect them; taking steps to monitor and supervise the subject; and taking disciplinary action in accordance with existing discipline policy. The threat assessment team will also work to address the conflict or problem that led to the threat. Examples of strategies that may be employed include but are not limited to:

1) Take precautions to protect potential victims. Precautions typically include:

   i. Provide supervision of the subject while on school property or at school sponsored events.

   ii. Caution the subject who made the threat about the consequences of carrying out the threat.

   iii. Where the subject is a student, contact the student's parents to assume responsibility for supervision of their child and to enlist their support in preventing the student from carrying out the threat.

   iv. Notify the intended target(s) and (if they are students) their parents. The intended target(s) (and, where appropriate) their parents, must be notified of the seriousness of the threat, the identity of the subject who made the threat, and what actions are being taken to support the safety of the target and the school as a whole.

   v. Consult with the school resource officer or other local law enforcement to determine if law enforcement action is needed.

2) Follow applicable disciplinary procedures in accordance with the CCPS's conduct policy.

3) Where appropriate, refer the subject for counseling, conflict mediation, or other interventions to reduce the threat of violence and to address the underlying conflict or issues that led to the threat. The school administrator should involve school-based professionals (such as the school psychologist, counselor, or social worker) or community-based professionals (e.g., Employee Assistance Program, community mental health

services, etc.) who can provide assistance and appropriate intervention.

4) If the threat of violence may potentially be related to a disability, the matter should be reviewed by CCPS's appropriate assessment team for child find review consistent with the provisions set forth in 20 U.S.C. §1412(a)(3); 30 CFR Part 300.

3. Examples of High-Risk Threat Responses

    a. Threatening behaviors indicating the intent, planning, or preparation to cause serious bodily injury or death (e.g., to rape, physically assault and inflict serious injury, kill, or use weapons against others and requires the immediate involvement of the threat assessment team. When the threat is determined to be high risk, the threat assessment team must:

1) Notify law enforcement to contain the threat and consult with School Safety and Security.

2) Notify the Superintendent or designee and Director of Student Services or designee.

3) Take immediate precautions to protect potential victims:

    i. Provide supervision of the subject while on school property or at school sponsored events.

    ii. Caution the subject who made the threat about the consequences of carrying out the threat.

    iii. Where the subject is a student, contact the student's parents and enlist their support in preventing their child from carrying out the threat; either law enforcement or the student's parents should assume responsibility for supervising the student.

    iv. Notify the intended target(s) and (if they are students) their parents. The intended target(s) (and, where appropriate) their parents, must be notified of the seriousness of the threat, the identity of the subject who made the threat, and what actions are being taken to support the safety of the target and the school as a whole.

4) Follow applicable disciplinary procedures in accordance with CCPS policy.

5) Where mental health or disability issues are reasonably believed to be causing or contributing to a risk of violence, the threat assessment team may consider a referral for an independent assessment by a qualified medical/psychological professional. The professional conducting the evaluation should not have a treatment relationship with the subject. An independent assessment should be based on a review of all

available information including, but not limited to, interview of the subject by the professional. The medical/psychological professional conducting the independent assessment must provide a written report of the evaluation back to the CCPS. The written report from the independent assessment must identify the problem or conflict that prompted the threat and recommend strategies to address the problem and to reduce the risk of violence. If warranted under the circumstances and based upon the evaluation, the student may need to be referred for a special education or Section 504 evaluation.

    i.   The school administrator or disciplinary hearing officer will determine the conditions of readmission to the school environment that may include the requirement to cooperate in a mental health evaluation. If the subject is a student, the parents are to be notified of all of the requirements and any failure to comply. A readmission meeting must be held prior to the subjects return to school/work.

   ii.   Every effort will be made by the threat assessment team members to obtain any required signed permission for release and exchange of information with mental health provider(s), if any, and where appropriate, local law enforcement agencies.

  iii.   Following the initial triage and/or assessment, the threat assessment team shall convene to complete and implement a written safety plan to address the immediate steps taken to prevent the threat from being carried out and a plan for further action before the subject is permitted to return to the school or be placed in an alternative educational environment. The safety plan should include the following items:

       1.   Conditions under which the subject may return to school/work;

       2.   Social and emotional interventions to support the student;

       3.   Develop an ongoing support and monitoring strategy to assess changes in risk and update the safety plan over time; and

       4.   Identify the person(s) who are responsible for monitoring and verifying that the safety plan recommendations are being followed.

  iv.   The threat assessment team may recommend that a student be excluded from the school / school activities during the threat assessment process when the

assessment team determines it is necessary to maintain a safe school environment. CCPS is required to provide the student with educational services while excluded from the school during the assessment process.

    4. Imminent Threat Responses

        a. An imminent threat exists when the person/situation appears to pose a clear and immediate threat of serious violence toward others. Such threats require immediate containment and action to protect identified target(s). Following immediate containment and action to protect identified target(s), these threats require the involvement of the threat assessment team for the purpose of conducting/coordinating appropriate mental health assessment and developing a safety plan.

            1) Notify law enforcement to contain the threat and consult with School Safety and Security.

            2) Notify the Superintendent or designee and Director of Student Services or designee.

            3) Where mental health or disability issues are reasonably believed to be causing or contributing to a risk of violence, the threat assessment team may consider a referral for an independent assessment by a qualified medical/psychological professional. The professional conducting the evaluation should not have a treatment relationship with the subject. An independent assessment should be based on a review of all available information including, but not limited to, interview of the subject by the professional. The medical/psychological professional conducting the independent assessment must provide a written report of the evaluation back to CCPS. The written report from the independent assessment must identify the problem or conflict that prompted the threat and recommend strategies to address the problem and to reduce the risk of violence. If warranted under the circumstances and based upon the evaluation, the student may need to be referred for a special education or Section 504 evaluation.

                i. The Superintendent/designee will determine the conditions of readmission to school/work that may include the requirement to cooperate in a mental health evaluation. If the subject is a student, the parents are to be notified of all requirements and consequences of any failure to comply. A readmission meeting must be held prior to the subject's return to school/work.

                ii. Threat assessment team members will obtain any required signed permission for the release and exchange of information with mental health provider(s),

if any, and where appropriate, local law enforcement agencies.

    iii. After receiving the mental health evaluation report, the threat assessment team shall convene to complete and implement a written safety plan to address the immediate steps taken to prevent the threat from being carried out and a plan for further action before the subject is permitted to return to school or an alternative educational environment. The safety plan should include

        1. conditions under which the subject may return to school/work;

        2. interventions, such as counseling or medication, that are needed to reduce risk;

        3. scheduled follow-up contacts with the subject (and parent if subject is a student) to assess changes in risk and update the safety plan over time, until the perceived threat is resolved; and

        4. person(s) who are responsible for monitoring and verifying that the safety plan recommendations are being followed.

4) A student should only be removed if the threatening behaviors engaged in by the subject are a violation of the relevant Code of Conduct /CCPS policy, and when all applicable disciplinary procedures are followed. However, in the event that the school administration or threat assessment team believes that the subject poses a significant risk to the health or safety of others that cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of auxiliary aids or services as provided in 28 CFR § 35.104 and 28 CFR §35.160, the imminent threat standard may be utilized. In applying the imminent threat standard, the school administrator should also consult with the CCPS's Director of Special Education, and, where available, legal counsel. Once the threat has been contained and de-escalated, if the assessment team determines that the student continues to pose a significant risk to the health or safety of others, the school should follow the applicable procedures set forth in COMAR 13A.08.03.06 for placement in an interim alternative educational setting.

5) In utilizing the imminent threat standard where a subject has a disability, it is important to note that a determination that a person with a disability poses a direct threat may not be based on generalizations or stereotypes about the effects of a particular disability and must be based on an individualized

assessment, based on reasonable judgment relying on current medical evidence or on the best available objective evidence, to determine: the nature, duration, and severity of the risk; the probability that the potential injury will actually occur; and whether reasonable modifications of policies, practices, or procedures will mitigate the risk.