Half Hollow Hills Central School District

Workplace Violence Prevention Program

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PART ONE: OVERVIEW

Introduction

What is Workplace Violence?

Workplace violence is defined as any physical assault or act of aggressive behavior that occurs where a public employee performs any work-related duty in the course of their employment. This includes but is not limited to:

1. An attempt or threat, whether verbal or physical, to inflict physical injury upon an employee.
2. Any intentional display of force which would give an employee reason to fear or expect bodily harm.
3. Intentional and wrongful physical contact with a person without his or her consent that entails some injury.
4. Stalking an employee to cause fear or harm to the employee's physical safety and health when such stalking has arisen through in the course of employment.

Workplace Definition

NYS DOL regulations define a workplace as any permanent or temporary location outside an employee's home where an employee performs any work-related duty in the course of employment.

Some examples include: *central office, field trip locations, out-of-office meetings or conferences, sporting events, school buses*

What is the New York State Workplace Violence Prevention Law and Regulation?

On June 7, 2006, New York State enacted legislation creating a new Section 27-b of State Labor Law that requires every public employer to evaluate the risk of workplace assaults and homicides at its workplace(s) and to develop and implement programs to prevent and minimize the hazard of workplace violence to public employees. In 2009, NYS Department of Labor (DOL) implemented regulations to accompany the Workplace Violence Prevention Law. These regulations are enforced by NYSDOL and can be found[1] at: https://dol.ny.gov/system/files/documents/2021/03/workplace-violence-prevention-regulations.pdf. Effective January 4, 2024, all public school districts, New York City public schools, Boards of Cooperative Education Services (BOCES) and County Vocational Education & extension Boards are covered by this law.

[1] Regulations can also be found in Title 12 of the New York Codes, Rules, and Regulations, Section 800.6

Purpose of this program

The purpose of this Workplace Violence Prevention Program is to provide information to administrators, faculty, staff, and authorized employee representatives about preventing and responding to incidents of workplace violence or threats of violence in accordance with the Workplace Violence Prevention Law and Regulation.

The goal of this program is to reduce the risk of workplace violence to employees and to ensure that any incident, complaint, or report of violence is taken seriously and dealt with appropriately and as expeditiously as possible. This program outlines the major components of our effort to meet these goals. At the core of this Workplace Violence Prevention Program is the Half Hollow Hills Central School District's commitment to work with its employees to maintain a work environment free from violence and other threatening behavior to the greatest degree possible.

Policy Statement

It is the Half Hollow Hills Central School District's policy to promote a safe environment for its employees. The District is committed to working with its employees to maintain a work environment free from violence, threats of violence, harassment, intimidation, and other disruptive behavior. While this kind of conduct is not pervasive in our district, no workplace is immune.

The District will implement a Workplace Violence Prevention Program, the objectives of which are to:

- Provide a concise document regarding the District's plan for identifying, preventing and responding to violent or potential violent incidents.
- Make all employees, including administrators and supervisors, aware of the type of situations that are considered violent, and their role in addressing them.
- Inform those in the District of the means of reporting such situations.
- Encourage and facilitate reporting of violent or potentially violent situations.
- Review situations and responses regularly.

The ultimate goal is to eliminate or reduce violent situations in the workplace.

Violence, threats, harassment, intimidation, and other disruptive behavior in our workplace will not be tolerated; that is, all reports of incidents will be taken seriously and will be dealt with appropriately. Such behavior can include oral or written statements, gestures, or expressions that communicate a direct or indirect threat of physical harm. Individuals who commit such acts may be subject to disciplinary action, criminal penalties, or both.

All employees are responsible for maintaining a safe work environment and must cooperate to implement this policy effectively. Anyone, employee or otherwise, who observes violent, threatening, harassing, intimidating, or other disruptive behavior on District property or at District-sponsored events, should report it immediately to an administrator or supervisor.

Any questions or concerns regarding implementation of the District's Workplace Violence Prevention Program should be directed to Dr. Jeffery Woodberry, Assistant Superintendent for District-wide Administration jwoodberry@hhh.k12.ny.us.

(Adapted from Dealing with Workplace Violence: A guide for agency planners. U.S. Office of Workforce Relations, The U.S. Department of Labor Workplace Violence Program, and the HHH BOE Policy 8130.2 Workplace Violence Prevention)

Full Workplace Violence Prevention Policy

8130.2 WORKPLACE VIOLENCE PREVENTION

The district is committed to establishing and maintaining a safe and secure workplace for employees. Workplace violence is a safety hazard to the district, its employees, and everyone in the workplace, and will not be tolerated. All employees are expected to work together to create and maintain a safe and respectful work environment for everyone.

Workplace violence is defined as any physical assault or act of aggressive behavior occurring where employees perform any work-related duty in the course of their employment including but not limited to an attempt or threat, whether verbal or physical, to inflict physical injury upon an employee; any intentional display of force which would give an employee reason to fear or expect bodily harm; intentional and wrongful physical contact with a person without their consent that entails some injury; or stalking an employee with the intent of causing fear of material harm to the physical safety and health of such employee when such stalking has arisen through and in the course of employment.

All employees are responsible for notifying their supervisor or other designated contact person of any violent incidents, threatening behavior, including threats they have witnessed, received, or have been told that another person has witnessed or received. All acts of workplace violence will be promptly and thoroughly investigated, and appropriate action will be taken, including contacting law enforcement where necessary.

Designated Contact Person: Dr. Jeffery Woodberry

Title: Assistant Superintendent for District-wide Administration

Department: District-wide Administration

Phone: 631-592-3025

E-mail: jwoodberry@hhh.k12.ny.us

As required by Labor Law §27-b, the district will develop and implement a Workplace Violence Prevention Program to comply with the law and its implementing regulations. The Program will include elements required by law and regulation, including:

a. the risk factors present in the workplace;
b. the methods the district will use to prevent incidents of violence in the workplace;
c. the methods and means by which the district will address specific identified hazards;
d. a system to report workplace violence incidents in writing;
e. a written outline for employee training; and
f. a plan for annual program review and update

In developing the Workplace Violence Prevention Program, the district will conduct an evaluation to identify likely potential risks of violence in the workplace. Authorized employee representative(s) will be involved in:

a. evaluating the physical environment;
b. developing the Workplace Violence Prevention Program; and
c. reviewing workplace violence incident reports at least annually to identify trends in the types of incidents reported, if any, and reviewing the effectiveness of the mitigating actions taken.

Employee Notice and Training

As required by law, all employees will participate in Workplace Violence Prevention Training Program at the time of initial assignment and annually thereafter. Employees must be trained on:

a. the details of the workplace violence prevention program;
b. the measures they can take to protect themselves from risks of violence; and
c. the specific procedures the district has implemented to protect employees (such as appropriate work practices, emergency procedures, and the use of security alarms).

Additionally, at the time of initial assignment and at least annually, employees will be informed of the requirements of Labor Law §27-b, the risk factors identified in the workplace, and the location of the district's Workplace Violence Prevention Program.

This policy must be posted where notices to employees are normally posted.

Allegations of Violations and Non-Retaliation

The process for employees to allege violations of the workplace violence prevention program to the state Commissioner of Labor, and the employment protections for doing so, is set forth in Labor Law §27-b and 12 NYCRR §800.6 and includes the following:

> A "serious violation" of the workplace violence prevention program is the failure to develop and implement a program or address situations which could result in serious physical harm. "Imminent danger" is any condition or practice in the workplace where a danger exists which could reasonably be expected to cause death or serious physical harm immediately, or before the imminence of the danger can be eliminated through these complaint procedures.
>
> Employees or their representatives who believe that a serious violation of the workplace violence prevention program exists or that an imminent danger exists (as defined above), must bring the matter to their supervisor's attention in writing, and must give the district a reasonable opportunity to correct the activity, policy or practice, before notifying the Commissioner of Labor. However, such prior written notice and opportunity for correction is not required if there is an imminent danger or threat to the safety of a specific employee,

and the employee reasonably believes in good faith that reporting to a supervisor would not result in corrective action.

If, after the matter has been brought to a supervisor's attention and a reasonable opportunity to correct the issue has passed, the issue has not been resolved and the employee still believes that a violation of the workplace violence prevention program remains or that an imminent danger exists, employees or their representatives may request an inspection from the Commissioner of Labor in writing. The Commissioner will provide a copy of the request to the district, but the employee may request that their name be withheld.

A district representative and authorized employee representative may accompany the Commissioner of Labor during the inspection to assist in the inspection. If there is no authorized employee representative, the Commissioner will consult with district employees concerning workplace safety.

The district will not take retaliatory action (terminate, suspend, demote, penalize, discriminate, or other adverse employment action in the terms and conditions of employment) against any employee because they have alleged a serious violation of the workplace violence prevention program, or imminent danger exists, requested an inspection by the Commissioner of Labor, or accompanied the Commissioner on the inspection, as prescribed by state law and regulation.

Cross-ref:

5300, Code of Conduct

8130, School Safety Plans and Teams

Ref:

Labor Law §27-b

12 NYCRR §800.6

Adoption date: January 8, 2024

Other Relevant / Related Board Policies

0000.0115 – Student Harassment and Bullying Prevention and Intervention

5300.00 – Student Code of Conduct

5300.30 – Prohibited Student Conduct

5300.40 – Disciplinary Penalties, Procedures and Referrals

Recordkeeping Practices

All workplace violence incidents and threats will be documented in a workplace violence incident report. Workplace violence incidents that cause a work-related death or an injury that meets the recording criteria of the Public Employee Safety and Health Bureau (PESH) log of injuries and illnesses should be recorded on both the PESH log and the workplace violence incidents report. For more on the PESH log of injuries and illness, visit the PESH website linked here: https://dol.ny.gov/public-employee-safety-health

Workplace violence incident reports will provide a written description when an incident occurs so that management can evaluate why the incident occurred and implement an appropriate safeguard or control measure to reduce the risk of such incidents from happening again. The Workplace Violence Incidents Report also creates a historical record. The Workplace Violence Incident Report(s) will be reviewed at least once a year by management and authorized employee representatives to determine if and how the workplace violence prevention program should be updated.

Program Review

The Assistant Superintendent for Districtwide Administration, with the Authorized Employee Representatives, will evaluate the effectiveness of this Workplace Violence Prevention Program at least annually or after any serious workplace violence incident. The review will focus on:

- determining trends in workplace violence incidents;
- addressing the root cause of incidents;
- evaluating the effectiveness of the control measures in place;
- and determining if any changes need to be made to control measures.

The review will also assess whether the reporting and record keeping systems have been effective in collecting all relevant information. Names and titles of those who perform the review and the date of completion will be updated no less than annually and provided in the opening pages of this document.

If an employee or authorized representative submits a written notice of concern regarding a violation of the employer's workplace violence prevention program or imminent danger in the workplace, the employer must be afforded a reasonable opportunity to address the reported issue. If the employee or authorized employee representative believes that the reported concern has not been resolved and a serious violation of the District's workplace violence prevention program still exists, the employee or authorized employee representative may

a) initiate a grievance pursuant to the procedures outlined in their collective bargaining agreement;
b) file an appeal to the District's Threat Assessment Team (TAT); and/or
c) request an inspection by filing a complaint with the Public Employee Safety and Health (PESH) bureau at the Department of Labor's Division of Safety and Health using the complaint form linked here: https://dol.ny.gov/system/files/documents/2023/09/pesh7.pdf or by calling 1-844-SAFE-NYS. The completed and signed complaint form can be emailed to ask.shnypesh@labor.ny.gov, or faxed or mailed to the nearest Division of Safety and Health (DOSH) District Office listed in the complaint form.

The District and its employee representatives are committed to working collaboratively to ensure our workplaces are free from threats and violence. No retaliatory action shall be taken against an employee who uses any of the above channels to address a workplace violence concern.

Employees can also contact the PESH bureau to ask questions about health and safety standards by calling: 1-844-SAFE-NYS or emailing ask.shnypesh@labor.ny.gov. An employee is NOT required to provide written notice to an employer if the employee believes themselves, another employee, or patient is in imminent danger of workplace violence and reasonably believes, in good faith, that reporting to a supervisor would not result in corrective action. In such an instance, an employee can reach out directly to PESH.

For additional information on recordkeeping or workplace violence prevention, or to request free and confidential consultation assistance, please use the contact information on the PESH Consultation Fact Sheet available here: https://dol.ny.gov/system/files/documents/2023/11/p206_12-10-20.pdf

PART TWO: PREVENTION

Workplace Risk Evaluation

The District has conducted a workplace risk evaluation consisting of:

A record examination: The District has examined all records of workplace violence incidents in the past year to identify patterns in the type and cause of incidents; areas of the workplace where incidents occur; incidents that involve specific workplace operations; or incidents which involve specific individuals.

An assessment of administrative risk factors: The District has assessed all relevant policies, practices, and procedures that may impact the risk of workplace violence.

An evaluation of the physical environment: The District has evaluated the physical work environment for factors which may place employees at risk of workplace violence with the participation of authorized employee representatives. Although workplace violence can occur in any work setting, certain factors or situations may place employees at a greater risk of workplace violence.

Employment situations or factors that may pose a higher risk for District employees include, but are not limited to, the following:

- Working in public settings
- Working alone or in small numbers
- Having a mobile workplace assignment
- Working with a population which might expose one to potentially violent persons
- Worker-on-worker workplace violence

Workplace Violence Control Measures and Prevention

Hierarchy of Controls

A hierarchy of controls is a safety professional term referring to a ranking of the safeguards that an employer can use to protect employees from harm in order of preference and effectiveness. There are three main types of safeguards, or control measures, that an employer can implement to protect employees from recognized workplace violence risk factors. Engineering controls are considered the most effective, followed by work practice controls, and then personal protective equipment.

Engineering controls eliminate or reduce the risk of workplace violence through physical changes to the workplace.

Work practice controls eliminate or reduce the risk of workplace violence through changes to organizational policies, procedures, and work practices.

Personal Protective Equipment (PPE) is generally considered the least effective control measure but may be needed to enhance other control measures or minimize potential injury severity when other control measures fail.

Risk Factors and Control Measures

Risks identified in our workplace risk evaluation, and corresponding control methods to reduce those risks, are shown in tables below for each of our facilities:

Note: Items in RED are pending additional review.

GENERAL SECURITY FEATURES	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Barriers to separate visitors from work areas	Visitors are checked into schools at secure vestibules and directed or escorted to the appropriate locations. In main offices, counters separate visitors from staff. Central Office visitor vestibule in progress
Separate interview area/s	Visitors are checked into schools at secure vestibules and directed or escorted to the appropriate locations. In main offices, counters separate visitors from staff.
Emergency numbers posted by phones	Emergency names and numbers will be posted by all phones.
Door detectors / alarms	Entry doors are not alarmed or remotely monitored. A single point of entry is monitored for outside visitors, who are provided temporary visitor badges. District staff placed strategically throughout all schools are able to detect outside visitors who have not appropriately registered with the school.
Panic button/s	All classroom phones have the ability to call outside lines and initiate an All Call over school PAs. Instructions for initiating All Calls are provided to staff.
Are emergency contact names and numbers posted in each occupied room	Emergency names and numbers will be posted by all phones.
FACTORS THAT MIGHT PLACE EMPLOYEES AT RISK	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Employees work in public settings	Visitors are checked into schools at secure vestibules and directed or escorted to the appropriate locations. Security officers are present inside and outside of all school buildings.
Employees work late night or early morning hours	Security officers are present at schools for all hours of operation. Administrators are present at evening conferences. Chaperones are present at all sporting events and school functions.
Employees exchange money as part of the job	Yes, employees exchange money for various field trips, fundraisers, and other sales. There are currently no plans to create added safety measures in this area.
Employees work alone or in small numbers	Due to the nature of some positions, staff may work alone or in small numbers at times. These staff members have access to classroom telephones to call for assistance if necessary.
Work in a location with uncontrolled public access	Visitors are checked into schools at secure vestibules and directed or escorted to the appropriate locations. In main offices, counters separate visitors from staff. Security guards routinely patrol school grounds.
Areas of previous security concerns	*Reviewing at School level*
Employees work with the public	Visitors are checked into schools at secure vestibules and directed or escorted to the appropriate locations. Security officers are present inside and outside of all school buildings.
Employees work with volatile persons	Staff working with volatile students will receive training in restraint and de-escalation. Emergency phones are available in all occupied areas. Staff ratios in the most volatile settings offer

	additional support for employees in the event of a potentially violent incident. Personal protective equipment will be provided if requested.
Are electric panels locked to prevent unauthorized access	*Reviewing at Facilities level*
Any other factors that might place employees at risk	*Reviewing at School level*
SECURITY	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Are ID badges required to be worn by all personnel	Building administrators will reinforce expectation that employees wear badges at all times.
Are students required to use school issued ID badges?	Presently, there are no plans to require that students wear badges while at school.
PARKING LOTS	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Are parking areas protected with security personnel	Security personnel at buildings until roughly 10:30pm, M-F and additional as needed for events.
Are parking areas equipped with security cameras?	Yes, although every inch of every parking lot may not be covered
Are parking areas equipped with lights	Yes – some in the lot directly, other lighting comes off the buildings
OFFICES	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Do office areas have controlled access	Visitors are checked into schools at secure vestibules, provided temporary visitor badges, and directed or escorted to the appropriate locations. District staff placed strategically throughout all schools are able to detect outside visitors who have not appropriately registered with the school.
Is office area equipped with panic alarm?	All main offices have access to emergency phones which immediately dispatch local first responders. Main offices are also able to initiate All Calls over the PA system.
Do employees receive de-escalation training?	Although elements of de-escalation appear in various trainings, they have not been required of all staff. The District will add such training to its GCN online learning portal for staff and notify employees. Employees who work in settings with identified risks will be provided de-escalation training during regularly scheduled meeting time.
CLASSROOMS	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Are classroom personnel equipped with radios	All classroom phones have the ability to call outside lines and initiate an All Call over school PAs. Instructions for initiating All Calls are provided to staff.
Is personal protective equipment provided to all classroom personnel as needed?	Each school is staffed with at least one full-time nurse and health aide. Staff are encouraged to send injured students and colleagues to the Nurse's office for appropriate care.
Are classroom personnel exposed to violent behavior from students?	Staff working with volatile students will receive training in restraint and de-escalation. Emergency phones are available in all occupied areas. Staff ratios in the most volatile settings offer additional support for employees in the event of a potentially violent incident. Personal protective equipment will be provided if requested.
Do classroom personnel receive de-escalation training	Although elements of de-escalation appear in various trainings, they have not been required of all staff. The District will add such training to its GCN online learning portal for staff and

	notify employees. Employees who work in settings with identified risks will be provided de-escalation training during regularly scheduled meeting time.
Are classroom personnel informed of students with behavioral issues prior to student placement?	While not all behavioral student issues are articulated from one grade level, school or teacher to another, violent and threatening behavior will be communicated to relevant staff prior to student placement.
Have classroom personnel been provided with training on working with students with behavioral issues?	It is expected that teachers receive training on working with students with behavioral issues as part of their certification requirements and working experiences. District meetings and trainings address student behavior intermittently throughout the year.
Are windows locked to prevent uncontrolled access	Custodians ensure that windows are locked nightly. Windows will be inspected to identify and repair any that currently do not lock.
Is availability to items that can be used as weapons by students minimized	*Reviewing at School level*
CAFETERIAS	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Is access restricted to authorized personnel only	Visitors are checked into schools at secure vestibules and directed or escorted to the appropriate locations. In addition, monitors and other staff are assigned to or routinely supervise school cafeterias.
Is cafeteria equipped with security cameras	Yes
Are evacuation maps posted at all exits	Evacuation maps will be posted at all cafeteria exits.
AUDITORIUMS	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Are all entrances kept locked when not in use	*Reviewing at School level*
Is auditorium, stage, backstage equipped with security cameras	Yes
Is auditorium, stage, backstage equipped with security lighting	*Reviewing at Facilities level*
Is backstage entrance restricted to authorized personnel only during events	Unauthorized visitors are not permitted near backstage areas near events.
Are catwalks, light towers, etc. restricted to authorized personnel only	Yes, further, auditoriums are secured so no one is allowed access without authorization or supervision
Is auditorium patrolled by security/law enforcement during events	Security guards routinely patrol school grounds during operating hours. In addition, all public events are chaperoned by identifiable district employees.
GYMNASIUMS	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Does gymnasium have exterior lighting around all entrances and exits	Yes
Are locker rooms locked or monitored to prevent unauthorized entry	Locker rooms are monitored throughout the day and after school by a monitor. Physical education officers are located inside the locker rooms, and teachers are encouraged to be present during changing periods. Coaches are expected to be in locker rooms when athletes are preparing for competitive events. Unfortunately, logistics of the space do create corners and blind spots. Due to privacy concerns, however, there are no plans for increasing monitoring of the space beyond what is already done.

Is the area patrolled by security – law enforcement during events	All competitive sporting events are chaperoned by identifiable district employees. Select events are also patrolled by additional security as needed.
Is gymnasium equipped with security cameras?	As it is an instructional space, the gymnasium is not equipped with security cameras.
ATHLETIC FIELDS	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Is security/law enforcement present for all sporting events	All competitive sporting events are chaperoned by identifiable district employees. Select events are also patrolled by additional security as needed.
Are athletic fields protected from unauthorized entry with fences	No. Security guards routinely patrol school grounds. In addition, all competitive sporting events are chaperoned by identifiable district employees.
Are athletic fields equipped with security/event lighting	Our schools do not host night events outdoors.
Are IDs required to be worn by school personnel at sporting events	Chaperones are required to wear easily identifiable clothing (i.e. jacket, T-shirt).
TRANSPORTATION / BUS STORAGE FACILITY	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Limiting the posting of signs on windows	Only pre-approved signs are posted, and not on windows.
Posted evacuation map	Evacuation maps will be visibly posted in the facility
Does facility conduct routine evacuation / fire drills?	Transportation supervisor will be instructed to conduct regular emergency drills with facility employees
Are parking lots equipped with lights?	Yes
Is office area equipped with panic alarm	All offices are equipped with phones capable of contacting outside lines in the event of an emergency.
Do employees receive de-escalation training?	Although elements of de-escalation appear in various trainings, they have not been required of all staff. The District will add such training to its GCN online learning portal for staff and notify employees. Employees who work in settings with identified risks will be provided de-escalation training during regularly scheduled meeting time.
Are electric panels locked to prevent unauthorized access	*Reviewing at Administrative level*
Do all bus runs have two employees on board for each run	Some do (matron assigned to the bus or as a 1:1. There are also monitors assigned temporarily to address student behavior as needed.
FIELD TRIPS	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Does school personnel verify ID of each student at beginning and end of trip	Teachers and chaperones conduct roll calls of students at the beginning and end of each field trip.
Do chaperones receive security briefings prior to trip	Many field trips are repeated from year to year, so staff are familiar with the venues and protocol. Regardless, it is expected that each venue communicates expectations with field trip contacts before the trip. Teachers review these expectations with students and parents as needed.
BUILDINGS AND GROUNDS	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Is equipment locked up when not in use	Yes.
STAFF MEETINGS & CONFERENCES	
IDENTIFIED RISK	**SELECTED CONTROL/S**
Do security/law enforcement personnel patrol facility during these events	Security officers are present inside and outside of all school buildings and routinely patrol school grounds.

Do school personnel receive de-escalation training	Although elements of de-escalation appear in various trainings, they have not been required of all staff. The District will add such training to its GCN online learning portal for staff and notify employees.
Are metal detectors utilized for after hour activities such as conferences & meetings	No. There are no plans for purchasing and implementing metal detectors on school grounds.

Workplace Violence Prevention

Prevention of violence in the workplace is the District's responsibility, and everyone has a role to play in keeping the workplace safe from violence. The following section focuses on early warning signs of violent behavior and workplace issues that have the potential to trigger violent behavior. Management, employees, and authorized representatives should be familiar with the signs and issues described below to intervene early and reduce the likelihood of workplace violence.

Early warning signs of potential violence

There is no single "profile" that can identify a potentially dangerous individual. It is important to be careful when drawing assumptions about a person's potential for violence based on any specific behavior or action. However, certain patterns of behavior and events frequently precede episodes of violence.

Behavior or situations that may indicate an increased risk of violence include, but are not limited to the following:

- Direct or veiled threats of harm
- Intimidation, belligerence, bullying or other inappropriate behavior directed at others
- Numerous conflicts and/or verbal comments expressing hostility directed at others
- Bringing and/or brandishing an unauthorized weapon to work/school, making inappropriate reference to guns or expressing fascination with weapons
- Fascination with incidents of workplace/school violence, statements in person or online indicating approval of the use of violence to resolve a problem, or statements indicating identification with perpetrators of workplace homicides
- Statements in person or online indicating an increased tone of desperation, feeling that normal interventions to solve a problem will not work, feeling hopeless about a situation at work, with family, with finances, and other personal problems
- Signs of abuse or drugs or alcohol
- Extreme or uncharacteristic changes in behavior or displays of emotion
- Temporary orders of protection
- Employees with ongoing domestic difficulties

These behaviors should be reported to school safety leaders and/or the administrator of the workplace violence prevention program. Some behaviors may require immediate law enforcement intervention where others may require disciplinary action or indicate a need for an Employee Assistance Program (EAP) referral.

Other Risk Factors

The presence of risk factors increases the odds of violent behavior. Although no one risk factor, or set of factors, perfectly predicts violence, the greater the number of risk factors that can be identified, the greater the need to be vigilant.

- Is socially withdrawn
- Is isolated, alienated and/or rejected
- Has been a victim of violence and/or bullying
- Feels persecuted and picked on
- Has low school interest and performance
- Expresses intolerance and prejudice
- Has used drugs and alcohol
- Has been affiliated with gangs
- Expresses personal grievance or moral outrage
- Expresses ideological thinking (often reinforced by others, including websites or virtual sites)
- Is unable to affiliate with prosocial groups
- Is dependent on virtual communities
- Has occupational goals that have not been achieved or are unattainable
- Interpersonal relationship failures
- Has had a mental health disorder
- Has access to or possesses firearms
- Has a history of
    - Violent expressions in writings and drawings
    - Serious threats of violence
    - Uncontrolled anger
    - Impulsive and chronic hitting, intimidating, or bullying
    - Disciplinary problems that involve violence
    - Criminal violence

Workplace issues that may trigger worker-related violence

Common situations that may trigger workplace violence can be categorized under employee issues, student issues, or workplace issues.

Employee issues include:

- A negative performance review
- An unwelcome change in role due to performance or reorganization in the workplace
- An unwelcome change in work schedule
- Criticism of an employee's performance
- A conflict with a coworker or supervisor
- Personal stress outside the workplace
- Increase workload or pressure

Workplace issues include:

- No clearly defined rules of conduct
- A lack of employee training
- Inadequate hiring practices or screening of potential employees
- Insufficient supervision of employees
- A lack of discipline or inconsistent discipline in the workplace
- A lack of employee support systems or systems that are inadequate
- Employer failure to address incidents as they occur
- An overly authoritarian management style in the workplace

Note: *A workplace issue that only an employee perceives can still be a trigger for workplace violence.*

Recognizing the signs and intervening early

To help prevent a violent situation from occurring, administration, faculty, staff, and authorized representatives should be trained to recognize the early warning signs (such as a change in a person's behavior before an episode of violence) and the issues or events that may trigger violence. With this knowledge an employer can intervene early to prevent a violent incident from occurring.

PART THREE: SCHOOL VIOLENCE

Half Hollow Hills Prevention/Intervention Program Initiatives

The Half Hollow Hills Central School District has many programs and activities for improving communication among and between students and staff in an effort to reduce the risk of violence among students.

These programs provide peer mentoring and conflict resolution while creating a forum for students' concerns.

They provide support and comfort for the students while they discover methods to strengthen their communication and helping skills to provide support to others and services to their schools and community.

The district uses three such programs to help achieve these goals. They are:

- Peer Ambassadors – High Schools
- Say Something – Anonymous Reporting System
- The Sandy Hook Promise – Districtwide
    - Say Something Week
    - Start with Hello
    - Your Mental Health First Aid
    - Safety Assessment & Intervention
    - Mental Health & Violence Prevention Week

Preventing Targeted School Violence

The findings of the *Safe School Initiative* suggest that there are productive actions that educators, law enforcement officials, and others can pursue in response to the problem of targeted school violence. Specifically, findings suggest that these officials may wish to consider focusing their efforts to formulate strategies for preventing these attacks in two principal areas:

- Developing the capacity to pick up on and evaluate available or knowable information that might indicate that there is a risk of a targeted school attack; and
- Employing the results of these risk evaluations, or "threat assessments," in developing strategies to prevent potential school attacks from occurring.

Support for these suggestions is found in the 10 key findings of the *Safe School Initiative*:

- Incidents of targeted violence at school are rarely sudden, impulsive acts.
- Prior to most incidents, other people knew about the attacker's idea and/or plan to attack.
- Most attackers did not threaten their targets directly prior to advancing the attack.
- There is no accurate or useful "profile" of students who engage in targeted school violence.
- Most attackers engaged in some behavior, prior to the incident, that caused concern or indicated a need for help.
- Most attackers were know to have difficulty coping with significant losses or personal failures. Many had considered or attempted suicide.
- Many attackers felt bullied, persecuted, or injured by others prior to the attack.
- Most attackers had access to and had used weapons prior to the attack.
- In many cases, other students were involved in some capacity.

Despite prompt law enforcement responses, most shooting incidents were stopped by means other than law enforcement intervention.

Preventing Classroom Violence – A Whole-School Approach

There are several actions that districts can take as part of a whole-school approach to violence in the classroom. These include but are not limited to

- Engaging parents and teachers of each student with a history of aggressive behavior in a discussion about trauma history and known triggers for that child.
- Examining classroom environment and practices to eliminate or reduce triggering stimuli for all students, as well as for individual students with a history of aggressive behavior.
- Providing information and consultation for teachers about how to recognize the early signs of dysregulation in all students, and in specific at-risk students.
- Providing educator training and creating a de-escalation manual with strategies that can be used to turn down the heat when one or more students begin to exhibit dysregulated behavior.
- Avoiding placing a student back in a classroom setting after an aggressive outburst warrants removal from the classroom. Creating a de-escalation/safe room where an agitated student can calm down and re-regulate.
- Ensuring that incident reports are created for any aggressive outburst and creating a process for regularly aggregating and analyzing the data. These findings often point directly to policies/procedures/actions that need to be changed.
- Creating a model for community learning — helping parents and guardians learn how to identify the early warning signs of aggression in their children and how to minimize triggers and de-escalate situations. Helping parents understand what factors contribute to aggression in children.
- Making referrals to school-based or community mental health services BEFORE a major aggressive incident occurs.

Confidentiality and Information Sharing

Faculty and staff plan a critical role in keeping our places of learning safe. The District recognizes that open communication about violence or threats of violence, to the extent permissible by law, is essential to protecting the safety and the rights of students and staff.

Nothing in this part shall require the disclosure of information otherwise kept confidential for security reasons. Such information may include information, which, if disclosed, would:

- Interfere with law enforcement investigations or judicial proceedings;
- Deprive a person of a right to a fair trial or impartial adjudication;
- Identify a confidential source or disclose confidential information relating to a criminal investigation;
- Reveal criminal investigative techniques or procedures, except routine techniques and procedures; or
- Endanger the life or safety of any person

What is FERPA? (Family Education Rights and Privacy Act)

FERPA is a federal law that protects the privacy of student *education records*. The law applies to all educational agencies and institutions that receive funds under any U.S. Department of Education program. FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are "eligible students." The Student Privacy Policy Office at the U.S. Department of Education administers FERPA.

FERPA protects the rights of parents or eligible students to

- Inspect and review education records;
- Seek to amend education records; and
- Consent to the disclosure of personally identifiable information (PII) from education records, except as specified by law.

What Are "Education Records"?

Different types of records and information may be protected by FERPA if determined to be "education records." Education records are protected by FERPA and are broadly defines as records that are directly related to a student and maintained by an educational agency or institution, or by a party acting for the agency or institution.

Balancing Safety and Privacy

School officials must balance safety interests and student privacy interests. FERPA contains exceptions to the general consent requirement, including the "health or safety emergency exception," and exceptions to the definition of education records, including "law enforcement unit records," which provide school officials with tools to support this goal.

The Health or Safety Emergency Exception to the Consent Requirement

FERPA generally requires written consent before disclosing PII from a student's education records to individuals other than his or her parents. However, the FERPA regulations permit school officials to disclose PII from education records without consent to appropriate parties only when there is an actual, impending, or imminent emergency, such as articulable and significant threat. Information may be disclosed only to protect the health or safety of students or other individuals.

Information Sharing in Support of the School Threat Assessment Process

When conducting an inquiry or investigation regarding a potential threat, the inquirer or investigator will find that different people in the student's life may have different- and possibly small- pieces of the puzzle. It is the responsibility of the threat assessment team to gather this information from what may be multiple sources- teachers, parents, friends, guidance counselors, after-school program staff, part-time employers, and others.

Dealing with Threats or Violent Student Behaviors

Any time a child strikes or threatens a staff member, the goal is to ensure it does not happen again. In the event that a threat or act of school violence is committed by a student with an IEP, the District recognizes both the student's right to the best education possible in the least restrictive environment, and the employee's right to safety in the workplace. To achieve those goals, the District may take actions such as:

1. Consider whether a Behavior Intervention Plan (BIP) is in place.
2. If a BIP is already in place, an act or threat of violence suggests that it needs to be reviewed by the team that has implemented it.
3. Implement mitigation strategies identified in the Workplace Violence Prevention Program.

Disciplinary Removals

If a child engages in dangerous behavior, such as carrying a weapon to school, or knowingly possessing or using illegal drugs or selling or soliciting the sale of a controlled substance while at school or a school function or inflicting serious bodily harm upon another and a manifestation review team finds the student's actions are ***not*** related to their disability, officials may remove the student for a maximum of 45 school days. Unlike other changes in placement, when officials remove a student due to a drug, weapons or serious bodily injury offense, parents only have the right to challenge the manifestation determination and the type of the interim placement selected rather than the change of placement itself.

Teacher Removal of Disruptive Students

Pursuant to Project SAVE and Section 3214 of Education law, teachers reserve the right to remove "disruptive" students from their classrooms consistent with the discipline measures contained in the Code of Conduct and state and federal laws and regulations.

A teacher's decision to remove a disruptive student may not be overturned by a principal unless:

- The charges are not supported by substantial evidence;
- The conduct is severe enough to warrant suspension from school and a suspension is imposed; or
- The student's removal is in violation of law.

The 1997 Amendments to the IDEA include specific provisions regarding the discipline of students with disabilities. The purpose of these provisions is to expand the authority of school officials to protect the safety of all students and to maintain orderly school environments while ensuring the essential rights and protections for students with disabilities.

Students with disabilities may be removed from a classroom by a teacher under SAVE Legislation. However, each school district's Code of Conduct must include provisions ensuring that the code is in compliance with Federal and State laws relating to students with disabilities. It is critical that school districts fully inform teachers of these procedures as well as the behavior management strategies and/or intervention to address the student's behavior, if any, included in a student's IEP or Behavior Intervention Plan (BIP). Any special education student with a behavior that impedes his or her learning or the learning of others must have a BIP to address the behavior.

Principal Suspension (Section 3214 of Education Law)

Project SAVE amended Section 3214 of Education Law to allow building principals to suspend for up to 5 school days a student who is insubordinate or disorderly or violent or disruptive or whose conduct otherwise endangers the safety, morals, health or welfare of others. Section 3214 also requires a teacher to immediately report and refer a violent pupil to the principal or superintendent for a violation of the code of conduct and a minimum suspension period. According to Section 3214 (2-a), a violent pupil is defined as follows:

A violent pupil is an elementary or secondary student under twenty-one years of age who:

a) Commits an act of violence upon a teacher, administrator or other school employees;
b) Commits, while on school district property, an act of violence upon another student or any other person lawfully upon said property;
c) Possesses, while on school district property, a gun, knife, explosive or incendiary bomb, or other dangerous instrument capable of causing physical injury or death;
d) Displays while on school district property, what appears to be a gun, knife, explosive or incendiary bomb or other dangerous instrument capable of causing death or physical injury;
e) Threatens, while on school district property, to use any instrument that appears capable of causing physical injury or death;
f) Knowingly and intentionally damages or destroys the personal property of a teacher, administrator, other school district employee or any person lawfully upon school district property; or
g) Knowingly and intentionally damages or destroys school district property.

In case of Assault

1. Try to avoid responding physically. If you have to respond physically to defend yourself or others, you should use reasonable force given the student's age, size and ability to inflict injury.

2. Be sure that the situation is stable and that a qualified individual assumes supervisory responsibility for students.

3. If you suffer injury, seek immediate emergency medical attention. Contact the school nurse. (The District's Workers' Compensation policy may require additional steps after you seek immediate medical attention. Please consult your Association representatives.)

4. Immediately identify and record the names, addresses and phone numbers of all witnesses, location time of the incident and the facts surrounding the incident.

5. Contact your Association representatives or officers (if applicable) immediately.

6. Immediately report the incident to the school administration. Ask for a copy of any reports generated by the administration, including any record of any medical diagnosis and treatment rendered to you by the school nurse or any emergency personnel. Request that your association assist you in obtaining immediate sick leave (if necessary) and go immediately to your own doctor for examination. The doctor should know and understand that it is important to document your injury and that their report will be important in this process. Color photos should be taken of any physical injury.

7. With the assistance of your representative, ensure that administration immediately documents the attack. Obtain a copy of the District's report and at least verbally reserve the right to correct or add to the report.

8. Take note of any personal losses—i.e. glasses damaged, watch or phone broken, medical expenses beyond that paid through hospitalization plan.

Advice for Employees Who are Assaulted by a Student with an IEP

In addition to the procedure already noted in this Policy:

1. Districts may remove a student with an IEP for no more than 10 days in the same school year for discipline related to similar behavior that resulted in a series of removals that constitute a pattern. When a decision is made to suspend a student with an IEP beyond this, a Manifestation Determination Review (MDR) must occur. The purpose of the MDR is to determine whether the behavior that led to the suspension was caused by the student's disability and/or if the behavior was a direct result of the school's failure to implement the student's IEP. (8 NYCRR 201.4 [c] [2].).

2. If the Team determines that the behavior was not a manifestation of disability, normal discipline may apply. If the Team determines that there is a connection, but the action subject to discipline fits one of three categories (1) drugs, (2) weapons, or (3) severe bodily harm, the student may be suspended for up to 45 days.

3. Even where removal is not being considered, staff may request an immediate meeting of the IEP Team to review the behavior and to determine whether the Team needs to change the student's IEP, program, placement, and/or behavior plan.

PART FOUR: REPORTING

Reporting an Incident

Overview

At the core of this Workplace Violence Prevention Program is the District's commitment to work with its employees to maintain a work environment free from violence and violent behavior to the greatest degree possible.

Any Half Hollow Hills employee who becomes aware of a physical assault, threatening behavior, or verbal abuse at the workplace must immediately report the facts and circumstances of the violent incident to their supervisor and/or the contact person identified in the Policy Statement.

Any employee who witnesses or encounters any threat or act of violence should

- immediately notify their administrator/supervisor; and
- complete and submit the "Workplace Violence Incident Report" available online

The District will then take necessary action.

If a pattern of workplace violence incidents develops that involve criminal conduct or serious injury, the District will attempt to develop a protocol with the District Attorney or Police to ensure that violent crimes committed against employees in the workplace are promptly investigated and appropriately prosecuted.

Retaliation against an employee who makes or escalates a report of violence or other violent behavior is strictly prohibited and shall be subject to appropriate corrective or disciplinary measures.

Reporting Workplace Violence – Instructions for Staff

Introduction

Workplace violence is a concern that the Half Hollow Hills Central School District takes very seriously. This guide is intended to assist employees in recognizing, reporting, and responding to incidents of workplace violence. Prompt and accurate reporting is crucial to maintaining a safe and healthy environment for everyone.

By following these reporting guidelines, district employees can contribute to maintaining a safe and respectful workplace for all. Remember, your commitment to reporting ensures a swift and appropriate response to workplace violence incidents.

Reporting Procedures:

Employee's Responsibility:

- If there is an immediate threat to the safety of individuals, take steps to ensure your safety and the safety of others, such as moving to a secure location.
- Report the incident to your immediate supervisor or manager as soon as possible.
- Use the designated reporting channels established by the district for reporting workplace violence.

Supervisor's Responsibility:

- Supervisors who receive a report of workplace violence must take immediate action to address the situation.
- Document the details of the incident, including the date, time, location, individuals involved, and a description of the events.
- Communicate details of the report and any steps taken to the building's Threat Assessment Team.

Human Resources' Responsibility:

- If the incident involves harassment, discrimination, or threats, the supervisor should involve the Human Resources department promptly.
- HR will conduct a thorough investigation, maintaining confidentiality to the extent allowed by law.

Reporting Channels:

Direct Supervisor:

- Employees are encouraged to report incidents to their direct supervisor or manager first and complete the Workplace Violence Reporting Form.

Human Resources Department:

- If the incident involves a supervisor or the employee is uncomfortable reporting to their supervisor, they may report directly to the Human Resources department.

Anonymous Reporting:

- *Employees who are victims of workplace violence can independently and voluntarily request that their names not be entered on the report.*

Follow-Up Actions:

Investigation:

- Once a report is received, the DISTRICT will conduct a thorough and impartial investigation.
- The goal is to gather information to determine the appropriate course of action.

Communication:

- The DISTRICT will communicate with the involved parties as appropriate and provide updates on the status of the investigation.

Resolution:

- Based on the findings of the investigation, appropriate actions will be taken to address the workplace violence and prevent its recurrence.

Support Services:

Employee Assistance Program (EAP):

- Employees are encouraged to utilize the Employee Assistance Programs available through the New York State Health Insurance Program (NYSHIP). These are available through Achieve Solutions at https://www.achievesolutions.net/achievesolutions/en/empireplan/Home.do.

Security Measures:

- If necessary, the DISTRICT will implement additional security measures to ensure the safety of employees.

Workplace Violence Incident Report Template

Please complete this form promptly following any incident involving workplace violence or the threat of workplace violence. Providing accurate and detailed information is crucial for the proper investigation and resolution of the matter.

If not submitting this form electronically, submit to administrator, supervisor or the Assistant Superintendent for Districtwide Administration

Name:
Phone Number *(optional)*:
Email *(optional)*:

Date of Incident:

Location where incident occurred (building, online, etc.)

Time of incident:

Names of anyone involved**:**

Detailed description of the incident, including events leading up to the incident and how the incident ended:

Names of witnesses (include statements, if applicable):

Did this incident result in an injury? (Yes/No)
(If "Yes", complete the Workers' Compensation Incident/Accident Report Form within 5 days.)

Has an employee Incident/Accident Report Form been submitted in relation to this incident (if applicable)? (Yes/No)

Attach/upload any relevant documents, emails or other incidents related to the incident.

(Employees who are victims of workplace violence can voluntarily request that their name not be entered on the report.)

PART FIVE: THREAT ASSESSMENT

Threat Assessment at Schools

Schools can and must respond to all threats that students (and others) make on school campuses. Use a threat assessment approach for evaluating and intervening with students' potential violent behavior. Although research shows that the vast majority of student threats of school violence do not result in actual violence, they nonetheless provide opportunities to better understand and respond to any special needs of the students making the threats and the students being threatened. Each threat needs to be reviewed and threat response efforts at school should be based on research-validated procedures. Collaboration and communication with other education, mental health, and law enforcement agencies is essential to an effective process, which should be incorporated into the school safety plan and training.

1. Threat assessment is intended to prevent violence and involves both assessment and intervention. Threat assessment involves **determining whether a student poses a threat of violence** (they have intent and means to carry out the threat).

2. A threat is an **expression of intent to physically or sexually harm someone**. This expression may be spoken, written, or gestured. Threats can be expressed directly or indirectly to the victim or to others, and threats may be explicit or implied. Threats sometimes, but rarely, actually involve guns or explosive devices.

3. A threat to harm others can be **transient** (i.e., expression of anger or frustration that can be quickly or easily resolved) or **substantive** (i.e., serious intent to harm others that involves a detailed plan and means).

4. **All school districts should develop and implement** threat assessment procedures that are clearly communicated to staff and families. It is an alternative to zero tolerance policies, which have been proven ineffective and counterproductive.

5. A school threat assessment is **conducted by a multidisciplinary team** of trained professionals, including a school mental health professional, administrators, and school resource officer or local law enforcement.

6. A threat assessment involves **evaluation and classification of the threat** (i.e., transient versus substantive) and **appropriate response and intervention**, including notification and involvement of parents and a written safety plan. It should include a suicide risk assessment as these students are often also suicidal.

7. **There is NO profile** of a student who will cause harm. There is no easy formula or profile of risk factors that accurately determines whether a student is going to commit a violent act. The use of profiling increases the likelihood of misidentifying students who are thought to pose a threat.

8. Most students who pose a substantive threat **indicate their intentions** in some way. Examples include statements to friends, ideas in written work, drawings, and postings on social media that threaten harm.

9. **It is important act quickly** if you are concerned about a threat. Steps to take can include contacting the appropriate school administrator, the school crisis team leader, the school-employed mental health professional, or local law enforcement immediately. It is their job to determine next steps, including potentially contacting named intended victims.

10. Threat assessment should be a component of a **comprehensive approach** maintaining a safe school, which offers a balance between physical and psychological safety.

Districtwide Behavioral Threat Assessment Team

The district began behavioral threat assessment and management training in July 2024 with Dr. Kostas Katsavdakis, Diplomate in Forensic Psychology, American Board of Professional Psychology. Most of the team members, other staff members and local law enforcement representatives have participated in several training sessions since that time.

The BTAT's principal responsibility is to guide the assessment and management of situations of concern. The team includes:

STAFF MEMBER	TITLE	LOCATION
Jeffery Woodberry	Assistant Supt Districtwide	FGAC
Mike Truocchio	Coordinator of Middle School Special Education	FGAC
Melissa Horal	Psychologist	Candlewood Middle
Maryann Fasciana	Principal	Puamanok Elementary
Matt Mayo	Principal	Candlewood Middle
Rosemarie Hofmann	Social Worker	High School East
Tom Rindos	SRO	FGAC
Andrea Mastrocco	Teacher	High School West
Jillian Razzano	Teacher	West Hollow

In addition, the administrator chairing the threat assessment team may wish to consider including as an ad hoc member of the team someone who knows the students of concern in the threat assessment inquiry.

If the student of concern is being provided services under the Individuals with Disabilities in Education Act (IDEA), a representative from the team that developed or manages that student's Individualized Education Plan (IEP) also should be brought onto the threat assessment team as an ad hoc member for the inquiry regarding this particular student.

Conducting a School Threat Assessment

The primary objective of a threat assessment inquiry is to determine whether a particular student poses a threat of targeted school violence.

When should a threat assessment inquiry be initiated?

Upon receiving information concerning a potentially threatening situation, the threat assessment team must first consider: "How much time do we have?" An inquiry should be initiated immediately (within hours of notification) in any situation of concern. If information concerning a threatening situation suggests that violence is imminent the matter of course should be referred immediately to police.

What information should be sought in an inquiry?

A school threat assessment inquiry should seek information in five areas:

1. The facts that drew attention to the student, the situation, and possibly the targets

The first area of inquiry concerns how the student came to the attention of school officials. What behaviors and/or communications were reported, and by whom? What was the situation? Who, if anyone, witnessed the reported behavior of concern? What was the context for the reported behavior, i.e., what else was going on at the time of the reported behavior?

2. Information about the student

Three kinds of general information about a student should be gathered: identifiers, background information, and information about the student's current life situation and circumstances.

A) Identifying information
- Name
- Physical description
- Date of birth
- Identification numbers (SSN, student ID, etc.)

B) Background information
- Residences
- Family/home situation
- Academic performance
- Social networks
- History of relationships and conflicts

- History of violence toward self and others
- History of harassing others or of being harassed by others
- History of having been a victim of violence or bullying
- Known attitudes toward violence
- Criminal behavior
- Mental health/substance abuse history
- Access to and use of weapons
- History of grievance and grudges

C) Current life information
- Present stability of living and home situations
- Nature and quality of current relationships and personal support
- Recent losses or losses of status (shame, humiliation, recent breakup or loss of significant relationship)
- Current grievances or grudges
- Perceptions of being treated unfairly
- Known difficulty coping with a stressful event
- Any "downward" progression in social, behavioral, or psychological functioning
- Recent hopelessness, desperation, and/or despair, including suicidal thoughts, gestures, actions, or attempts
- Pending crises or change in circumstances

3. Information about "attack-related" behaviors

Behaviors that should raise concern about potential violence include:

- Ideas or plans about injuring him/herself or attacking a school or persons at school;
- Communications or writings that suggest that the student has an unusual or worrisome interest in school attacks;
- Comments that express or imply the student is considering mounting an attack at school;
- Recent weapon-seeking behavior, especially if weapon-seeking is linked to ideas about attack or expressions about interest in attack;
- Communications or writings suggesting the student condones or is considering violence to redress a grievance or solve a problem; and
- Rehearsals of attacks or ambushes.

4. Motives

Motives for actual school attacks have included:

- Revenge for a perceived injury or grievance;
- Yearning for attention, recognition, or notoriety;
- A wish to solve a problem otherwise seen as unbearable; and
- A desire to die or be killed

5. Target selection

Most school shooters identified their targets to friends and fellow students before advancing the attack. Almost half of school shooters had more than one target. Threat assessors should consider whether and how a potential attacker's interest in a target may shift to another target over time. Information about a student's targets may provide clues to the student's motives, planning, and attack-related behaviors. Information about the student's motives also may inform the question of whether there are additional targets.

What are sources of information for the inquiry?

1. School information

A school threat assessment inquiry should begin with what is known about the student from records, teacher interviews, and other information easily accessed at the school and from school officials. In utilizing information from school records in a threat assessment inquiry, the threat assessment team should follow school policies and relevant laws regarding information-sharing.

2. Collateral school interviews

Students and adults who know the student who is the subject of the threat assessment inquiry should be asked about communications or other behaviors that may indicate the student of concern's ideas or intent. The focus of these interviews should be factual:

- What was said? To whom?
- What was written? To whom?
- What was done?
- When and where did this occur?
- Who else observed this behavior?
- Did the student say why he or she acted as they did?

Bystanders, observers, and other people who were there when the student engaged in threatening behaviors or made threatening statements should be queried about whether any of these behaviors or statements concerned or worried them.

3. Parent/guardian interview

Questions for parents should focus on the student's behaviors and communications, especially those that might be attack-related. The student's interest in weapons should be explored, as well as his or her access to weapons at home.

4. Interviews with the student of concern

The primary purpose of a student interview is to learn about the student's thinking, motives, and behavior. The tone of the interview should be professional, neutral, and non-confrontational, rather than accusatory or judgmental.

Before conducting an interview with a student of concern, the threat assessment team should be well-acquainted with the facts that brought the student to the attention of school administrators and others, and should have reviewed available information concerning the student's background, interests, and behaviors.

Generally, a student should be asked directly about his or her intentions.

5. Potential target interview

Individuals who have been identified as potential targets of the student of concern also should be interviewed. 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.

A potential target should be asked about their relationship to the student of concern and queried about recent interactions with that student. The interviewer should gather information about grievances and grudges that the student of concern may hold against a target or against others.

How should information be organized and analyzed?

Analysis of this information should, in the end, answer these questions: Is the behavior of the student consistent with movement on a pathway toward attack? Do the student's current situation and setting incline them toward or away from targeted violence?

Evaluation of information gathered from research and interviews conducted during a threat assessment inquiry should be guided by the following 11 key questions:

1. **What are the student's motive/s and goals?**
    - What motivated the student to make the statements or take the actions that caused him or her to come to attention?

- Does the situation or circumstance that led to these statements or actions still exist?
- Does the student have a major grievance or grudge? Against whom?
- What efforts have been made to resolve the problem and what has been the result? Does the potential attacker feel that any part of the problem is resolved or see any alternatives?

2. **Have there been any communications suggesting ideas or intent to attack?**
   - What, if anything, has the student communicated to someone else (targets, friends, other students, teachers, family, others) or written in a diary, journal, or Web site concerning his or her ideas and/or intentions?
   - Have friends been alerted or "warned away"?

3. **Has the subject shown inappropriate interest in any of the following?**
   - School attacks or attackers;
   - Weapons (including recent acquisition of any relevant weapon); or
   - Incidents of mass violence (terrorism, workplace violence, mass murderers).

4. **Has the student engaged in attack-related behaviors? These behaviors might include:**
   - Developing an attack idea or plan;
   - Making efforts to acquire or practice with weapons;
   - Casing, or checking out, possible sites and areas for attack; or
   - Rehearsing attacks or ambushes.

5. **Does the student have the capacity to carry out an act of targeted violence?**
   - How organized is the student's thinking and behavior?
   - Does the student have the means, e.g., access to a weapon, to carry out an attack?

6. **Is the student experiencing hopelessness, desperation, and/or despair?**
   - Is there information to suggest that the student is experiencing desperation and/or despair?
   - Has the student experienced a recent failure, loss and/or loss of status?
   - Is the student known to be having difficulty coping with a stressful event? Is the student now, or has the student ever been, suicidal or "accident-prone"? Has the student engaged in behavior that suggests that he or she has considered ending his or her life?

7. **Does the student have a trusting relationship with at least one responsible adult?**
   - Does the student have at least one relationship with an adult where the student feels that he or she can confide in the adult and believes that the adult will listen without

judging or jumping to conclusions? (Students with trusting relationships with adults may be directed away from violence and despair and toward hope.)
- Is the student emotionally connected to–or disconnected from–other students?
- Has the student previously come to someone's attention or raised concern in a way that suggested he or she needs intervention or supportive services?

8. **Does the student see violence as an acceptable–or desirable–or the only–way to solve problems?**
   - Does the setting around the student (friends, fellow students, parents, teachers, adults) explicitly or implicitly support or endorse violence as a way of resolving problems or disputes?
   - Has the student been "dared" by others to engage in an act of violence?

9. **Is the student's conversation and "story" consistent with his or her actions?**
   - Does information from collateral interviews and from the student's own behavior confirm or dispute what the student says is going on?

10. **Are other people concerned about the student's potential for violence?**
    - Are those who know the student concerned that he or she might take action based on violent ideas or plans?
    - Are those who know the student concerned about a specific target?
    - Have those who know the student witnessed recent changes or escalations in mood and behavior?

11. **What circumstances might affect the likelihood of an attack?**
    - What factors in the student's life and/or environment might increase or decrease the likelihood that the student will attempt to mount an attack at school?
    - What is the response of other persons who know about the student's ideas or plan to mount an attack? (Do those who know about the student's ideas actively discourage the student from acting violently, encourage the student to attack, deny the possibility of violence, passively collude with an attack, etc.?)

Thoughtful consideration of the answers to the above 11 questions will produce a sound foundation for the threat assessment team's response to the overarching question in a threat assessment inquiry: **Does the student of concern pose a threat of targeted violence at school? If the threat assessment team concludes that:**

a. **there is enough reliable information to answer the 11 key questions; and**
b. **the weight of the information is convincing that the student does not pose a threat of targeted school violence; then**

c. **the threat assessment team may conclude the threat assessment inquiry.**

If the team concludes that:

a. **there is insufficient information for the threat assessment team to be reasonably certain that the student does not pose a threat; or**
b. **the student appears to be on a path to attack; then**
c. **the team should recommend that the matter be referred to the appropriate law enforcement agency for a threat assessment investigation.**

PART SIX: POST-INCIDENT RESPONSE

Post-Incident Response

Administration has developed procedures to respond to incidents of workplace violence. These include the following as appropriate:

- Assure that injured employees receive prompt and appropriate medical care. (This includes but is not limited to, providing transportation of any injured persons to medical care. Prompt first aid and emergency medical treatment can minimize the harmful consequences of a violent incident.)
- Report the incident to the appropriate authorities as required by applicable laws and regulations.
- Secure the premises to safeguard evidence and reduce distractions during the post incident response process.
- Assure that an incident report is completed immediately after an incident occurs, noting details that might be forgotten over time. A sample Incident Report form is appended to this Program document.
- Address the need for appropriate treatment for employees who were victims of workplace violence. In addition to physical injuries, victims and witnesses may suffer psychological trauma, fear of returning to work, feelings of incompetence, guilt, powerlessness, and fear of criticism by supervisors or managers.
- Management will investigate any reported workplace violence incident thoroughly.

All employees should be trained to inform management about any incidents that occur and how to prepare an incident report. As part of a comprehensive Post-Incident Response program, training all employees in how to prepare an Incident Report complements targeting training provided to key employees, including but not limited to

In the event that critical incident management or crisis counseling is needed following a workplace violence incident in the district, arrangements may be made through administration, employee unions, or the Assistant Superintendent for Districtwide Administration.

PART SEVEN: TRAINING

Employee Information and Training

Training of every employee will be performed upon initial assignment and annually thereafter. Retraining is required any time there is a significant change to the district's workplace violence prevention program, a newly identified risk factor, or a control measure addition.

Training Outline

Information and Training for All Employees: All employees will be trained upon hire, and again annually on or about the start of each school year. Training will be provided through the District's Global Compliance Network (GCN) program and will include directions on how to access the entire Workplace Prevention Program and how to report an incident.

Building Level Threat Assessment Teams: Each building will have a Threat Assessment Team that includes administrators, staff, mental health professionals, and building security. Teams will be trained after the initial district-wide training, and will include training on how to conduct a threat assessment according to guidelines provided by the US Secret Service and Department of Education.

Districtwide Threat Assessment Teams: In addition to the Building Level Threat Assessment Teams, a team of district leaders and staff will receive in-depth training on threat assessment prior to implementation of the Workplace Violence Prevention Program. Training will cover topics including but not limited to

- Affective vs Predatory Violence
- Threat vs Risk Assessment
- Warning Behaviors
- Biases
- Risk Assessment Methods
- FERPA / Privacy Matters

APPENDIX

Bibliography

Dealing with Threats or Violent Behaviors from Students with IEPs, Pennsylvania State Education Association
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Guide for Preventing and Responding to School Violence, 2nd Edition, International Association of Chiefs of Police and US Department of Justice
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https://rems.ed.gov/K12InfoSharing.aspx

New York State Safe Schools Against Violence in Education Act (SAVE), NYSED
https://www.p12.nysed.gov/sss/ssae/schoolsafety/save/

Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates, United States Secret Service and US Department of Education
https://www2.ed.gov/admins/lead/safety/threatassessmentguide.pdf

Workplace Violence Prevention Policy Statement
Adapted from Dealing with Workplace Violence: A guide for agency planners. U.S. Office of Workforce Relations, The U.S. Department of Labor Workplace Violence Program, and the HHH BOE Policy 8130.2 Workplace Violence Prevention)

WORKSITE RISK EVALUATIONS

Physical Environment Evaluation Template

(Note: Completed evaluations for all worksites are available in the Appendix)

Location:

Names/Titles/Organizations for those conducting the evaluation:

**This section requires the participation of the authorized employee representative/s.*

Date:

1. General Security Features	Y	N	N/A	Notes/Comments
Are visitors permitted to enter the facility				
Are visitors required to wear visitor ID badges				
Reception Area Available				
Barriers to Separate Visitors from Work Areas				
Separate Interview Area/s				
Is each room equipped with a telephone or radio to call for help				
Emergency Numbers Posted by Phones				
Multiple Exits				
Unobstructed Office Exits				
Door Control/s (i.e. locks, remote buzzer, panic bars)				
Door Detector/s door alarm				
Adequate lighting in and around the workplace				
Panic Button/s				
Video Monitor/s				
Landscaping offers unobstructed view of the workplace				

Limiting the posting of signs on windows				
Are emergency contact names and phone numbers posted in each occupied room				
Other:				
2. Factors That Might Place Employees at Risk				
Employees work in public settings				
Employees work late night or early morning hours				
Employees exchange money as part of the job				
Work alone or in small numbers				
Work in a location with uncontrolled public access				
Areas of previous security concerns				
Employees work with the public				
Employees work in a high crime area				
Employees work with volatile persons				
Does facility have posted evacuation plan/maps				
Does facility conduct routine evacuation/fire drills				
Are electric panels locked to prevent unauthorized access				
Any other factors that might place employees at risk				
3. Security				
Does the facility use Resource Officers? If yes, how many?				
Are security guards present at the location				
Are guards posted at the entrance/s				
Do they patrol the building				
Are they provided with communication? If yes, indicate what type in notes?				
Are ID badges required to be work by all personnel				

Are students required to use school issued ID badges				
Is card reader or equivalent required for entry				
Is facility equipped with metal detectors				
Any other relevant information				
4. Parking Lots				
Are parking areas protected with security personnel				
Are parking areas patrolled by security personnel				
Are parking areas equipped with security cameras				
Are parking areas equipped with lights				
Are parking areas equipped with lights				
5. Offices				
Do office areas have controlled access				
Is office area separated from entrance with privacy glass				
Is office area equipped with panic alarm				
Are offices equipped with telephones to call 911				
Are telephones or radios used to communicate with facility personnel				
Are office doors equipped with door locks to prevent unauthorized access				
Do employees receive de-escalation training				
6. Classrooms				
Are evacuation maps posted in each classroom				
Are classroom doors equipped with locks to restrict access				
Are classrooms equipped with telephones				
Are classroom personnel equipped with radios				
Is personal protective equipment provided to all classroom personnel as needed				

Are classroom personnel exposed to violent behavior from students				
Do classroom personnel receive de-escalation training				
Are classroom personnel informed of students with behavioral issues prior to student placement				
Have classroom personnel been provided with training on working with students with behavioral issues				
Are windows locked to prevent uncontrolled access				
Is availability to items that can be used as weapons by students minimized				
7. Cafeterias				
Is access restricted to authorized personnel only				
Does cafeteria personnel exchange money with students and staff				
Is cafeteria equipped with security cameras				
Is cafeteria locked when not in use				
Are evacuation maps posted at all exits				
Is cafeteria staff provided with telephones and/or radios				
8. Auditoriums				
Are all entrances kept locked when not in use				
Is auditorium, stage, back stage, equipped with security cameras				
Is auditorium, stage, backstage equipped with security lighting				
Is backstage entrance restricted to authorized personnel only during events				
Are catwalks, light towers, etc. restricted to authorized personnel only				
Is auditorium patrolled by security/ law enforcement during events				
9. Gymnasiums				
Does gymnasium have exterior lighting around all entrances and exits				

Are locked rooms locked or monitored to prevent unauthorized entry				
Is the area patrolled by security/ law enforcement during events				
Is gymnasium equipped with security cameras				
10. Athletic Fields				
Is security/law enforcement present for all sporting events				
Are athletic fields protected from unauthorized entry with fences				
Are athletic fields equipped with security/event lighting				
Are IDs required to be work by school personnel at sporting events				
11. Bus Garage & Buses				
Are all buses equipped with radios				
Are all buses equipped with security cameras				
Is somebody available to respond to all radio calls from drivers that are on the road				
Are IDs required by individuals getting on buses				
Do all bus runs have two employees on board for each run				
Are buses secured or locked when not in use				
Is bus garage equipped with security cameras				
Is bus garage locked when vacant				
12. Field Trips				
Do school personnel have a copy of emergency contact names and numbers for administration				
Does school personnel verify ID of each student at beginning and end of trip				
Do chaperons receive security briefings prior to trip				
13. Building & Grounds				
Are buildings equipped with security cameras				

Are buildings equipped with security lighting				
Are buildings locked when not in use				
Are employees provided with radios				
Is equipment locked up when not in use				
14. Staff Meetings & Conferences				
Do security/law enforcement personnel patrol facility during these events				
Do school personnel receive de-escalation training				
Are metal detectors utilized for after hour activities such as conferences & meetings				
Hallway security lighting				