LENAPE TECHNICAL SCHOOL

SECTION: PUPILS

TITLE: THREAT ASSESSMENT

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	236.1 THREAT ASSESSMENT
Purpose	The Joint Operating Committee is committed to protecting the health, safety and welfare of its students and the community and providing the resources and support to address identified student needs. The Joint Operating Committee adopts this policy to address student behavior that may indicate a threat to the safety of the student, other students, school employees, school facilities, the community and others.[1]
Authority	The Joint Operating Committee directs the Administrative Director or designee, in consultation with the School Safety and Security Coordinator, to establish a threat assessment team and develop procedures for assessing and intervening with students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community and others.[1] **The established procedures must include protocols for the timely consultation between the team and law enforcement, juvenile justice agencies, county agencies, health care providers or behavioral service providers, as appropriate, to refer students whose behavior indicates a potential threat for additional interventions or supports, including the exchange of relevant information in accordance with federal and state law.[1][2][3]**
Definitions	**Behavioral service providers -** includes, but is not limited to, a state, county or local behavioral health service provider, crisis intervention center or psychiatric hospital. The term includes a private service provider which contracts with a state, county or local government to act as a behavioral health agency.[2] **Bias** – the attitudes or beliefs we have about a person or group that affects our understanding, actions and decisions in a conscious or subconscious manner. **Individualized Management Plan** – a plan developed for a student who is referred to the threat assessment team that documents the concerns that brought a student to the team's attention, as well as the resources and support a student might need based on the information gathered during the assessment.

	Threat assessment – a fact-based process for the assessment of and intervention with students whose behaviors may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others.
Delegation of Responsibility	The Administrative Director or designee, in consultation with the School Safety and Security Coordinator, shall appoint individuals to a school threat assessment team.[1] The Administrative Director or designee shall designate a member of the team as team leader for the threat assessment team.[1] The threat assessment team shall include the School Safety and Security Coordinator and individuals with expertise in school health; counseling, school psychology or social work; special education and school administration, law enforcement agency representatives, behavioral health professionals and members of the Safe2Say Something crisis team.[5] The Administrative Director or designee may assign additional staff members or designated community resources to the threat assessment team for assessment and response support. The Administrative Director or designee shall develop and implement administrative regulations to support the threat assessment process.
Guidelines	<u>Training</u> The School Safety and Security Coordinator shall ensure that threat assessment team members are provided individual and/or group training annually on:[1] 1. Responsibilities of threat assessment team members. 2. Process of identifying, reporting, assessing, responding to and intervening with threats. 3. Identifying and avoiding racial, cultural or disability bias.[9][10] 4. Confidentiality requirements under state and federal laws and regulations, and Joint Operating Committee policies[5][7][11][12][13] 5. Student Assistance Program process.[3] 6. Youth suicide awareness, prevention and response.[6] 7. Trauma-informed approach.[12] 8. Safe2Say Something procedures.[5] Threat assessment team training shall be credited toward professional education requirements and school safety and security training requirements

for staff, in accordance with applicable law and Joint Operating Committee policy[1][7][15][16][17][18]

Information for Students, Parents/Guardians and Staff

The school shall annually notify students, staff and parents/guardians about the existence and purpose of the threat assessment team through posting information on the school website, publishing in handbooks and through other appropriate methods.[1]

The threat assessment team shall make available age-appropriate informational materials to students regarding recognition of threatening or at-risk behavior that may present a threat to the student, other students, school employees, school facilities, the community or others and how to report concerns, including through the Safe2Say Something program and other school reporting hotlines or methods. Informational materials shall be available for review by parents/guardians[1][8][9][19][20][21]

The threat assessment team shall make available informational materials for employees regarding recognition of threatening or at-risk behavior that may present a threat to the student, other students, school employees, school facilities, the community or others and how to report concerns, including through the Safe2Say Something program and other school reporting hotlines or methods. Information for employees shall include a list of the staff members who have been appointed to the threat assessment team [1][8][9][19][20][21]

The school shall annually provide mandatory training for school staff on identification or recognition of student behavior that may indicate a threat to the safety of the student, other students, school employees, other individuals, school facilities or the community, in accordance with law, Joint Operating Committee policy and the standards specified by the state's School Safety and Security Committee[7][17]

Reporting and Identification

The threat assessment team shall document, assess and respond to reports received regarding students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others.[1]

The threat assessment team shall assist in assessing and responding to reports that are received through the Safe2Say Something Program identifying students who may be a threat to themselves or others.[1][7]

The threat assessment team shall assist in assessing and responding to reports of students exhibiting self-harm or suicide risk factors or warning signs, as

identified in accordance with applicable law and Joint Operating Committee policy.[1][8]

When the threat assessment team has made a preliminary determination that a student's reported behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others, the team shall immediately take the following steps:[1]

1. Notify the Administrative Director or designee and School Safety and Security Coordinator of the reported threat.
2. Notify the building administrator of the school building the student attends of the reported threat, who shall notify the student's parent/guardian of the reported threat.

When a reported student's behavior indicates that there may be an imminent threat to the safety of the student or others, or an emergency situation, a threat assessment team member shall take immediate action, which may include promptly reporting to the appropriate law enforcement agency and school administration[1][6][7][22]

Where a threat assessment team member has reasonable cause to suspect that a reported situation indicates that a student may be a victim of child abuse, the member shall make a report of suspected child abuse in accordance with law and Joint Operating Committee policy.[1][23][24]

Inquiry and Assessment

In investigating, assessing and responding to threat reports, the threat assessment team shall make a determination if the report should be addressed under one or more specific Joint Operating Committee policies or administrative regulations, based on the subject matter of the report and the requirements of law, regulations and Joint Operating Committee policy, including, but not limited to, reports involving:

1. Discrimination/ Harassment[9][19]
2. Bullying/Cyberbullying.[21]
3. Suicide Awareness, Prevention and Response.[8]
4. Hazing.[25]
5. Dating Violence.[26]

Members of the threat assessment team, in coordination with the student's school district of residence, shall engage in an assessment of the reported student behavior that may indicate a threat, in accordance with training and established procedures. This process may include, but is not limited to:

1. Interviewing the student, other students, staff, parents/guardians or

others regarding the subject(s) of the reported threat.

2. Reviewing existing academic, health and disciplinary records and assignments, as appropriate, regarding the subject(s) of the report.
3. Conducting searches of lockers, storage spaces, and other possessions on school property as applicable, in accordance with applicable law, regulations and Joint Operating Committee policy.[27]
4. Examining outside resources such as social media sites, in coordination with law enforcement, or contacting law enforcement, juvenile probation, or community agencies to request additional information about the subject(s) of the report, in accordance with law, regulations and Joint Operating Committee policies.
5. Where appropriate, convening the appropriate team to assess and/or address the situation that is the subject of the report, such as the Individualized Education Program (IEP) team, Section 504 Team, Behavior Support team, Student Assistance Program team, or others[5][10][28][29][30]

The threat assessment team shall establish and implement procedures, in accordance with the school's memorandum of understanding with each law enforcement agency having jurisdiction over school property, to address situations where the investigation of a reported threat shall be transferred to the appropriate law enforcement agency[6][22]

The threat assessment team may request that the county agency or juvenile probation department consult and cooperate with the team in assessing the student who is the subject of a preliminary determination regarding a threat.[1]

When assessment of a student's behavior determines that it is not a threat to the student, other students, school employees, school facilities, the community or others, the threat assessment team shall document the assessment and may refer the student to other appropriate resources such as the Student Assistance Program team, an IEP or Section 504 Team or other school supports and services.

Response and Intervention

The threat assessment team, in coordination with the student's school district of residence, shall develop an Individualized Management Plan for each student identified and assessed as posing a threat to the student, other students, school employees, school facilities, the community or others. The plan should document the team's evaluation of the threat and recommendations for disposition of the threat, including the information gathered during the assessment and recommendations for response and intervention.

Following notification to the student's parent/guardian, the threat assessment team, in coordination with the student's school district of residence, may refer the student to an appropriate program or take action to address the reported situation in accordance with applicable Joint Operating Committee policy, which may include, but is not limited to:[1]

1. A referral to the Student Assistance Program.[5]
2. A referral to the appropriate law enforcement agency.[6][7][22]
3. An appropriate evaluation to determine whether the student is a qualified student with a disability in need of a Section 504 Service Agreement or in need of special education services through an Individualized Education Program (IEP), in accordance with applicable law and Joint Operating Committee policy.[10][28]
4. A referral to the student's IEP Team to review and address the student's IEP and/or Positive Behavior Support Plan. This could include, but is not limited to, a manifestation determination or functional behavioral assessment in accordance with applicable law, regulations and Joint Operating Committee policy.[28][29][30]
5. A referral to the student's Section 504 Team review and address the student's Section 504 Service Agreement and/or Positive Behavior Support Plan.[10]
6. With prior parental consent, a referral to a behavioral service provider, health care provider or county agency.[31]
7. Addressing behavior in accordance with applicable discipline policies and the Code of Student Conduct.[32][33] [34][35]
8. Ongoing monitoring of the student by the threat assessment team, a child study team, Student Assistance Program team or other appropriate personnel.
9. Taking steps to address the safety of any potential targets identified by the reported threat.[7][36]

School Safety and Security *Incident Reporting –*

For reporting purposes, the term **incident** means an instance involving an act of violence; the possession of a weapon; the possession, use, or sale of a controlled substance or drug paraphernalia as defined in the Pennsylvania Controlled Substance, Drug, Device and Cosmetic Act; the possession, use or sale of alcohol or tobacco products; or conduct that constitutes an offense listed in the school safety and security provisions of School Code.[22][37][38][39]

When a reported threat also meets the definition of an incident, in accordance

with reporting requirements, the Administrative Director or designee shall immediately report required incidents, if not previously reported by school staff, and may report discretionary incidents committed by students on school property, at any school-sponsored activity or on a conveyance providing transportation to or from the school or a school-sponsored activity to the law enforcement agency that has jurisdiction over the school's property, in accordance with state law and regulations, the procedures set forth in the memorandum of understanding with **law** enforcement and Joint Operating Committee policies.[22][32][37][39][40][41][42]

The Administrative Director or designee shall notify the parent/guardian, if not previously notified by school staff, of any student directly involved in an incident on school property, at any school-sponsored activity or on a conveyance providing transportation to or from the school or a school-sponsored activity, who is a victim or suspect, immediately, as soon as practicable. The Administrative Director or designee will inform the parent/guardian whether or not the law enforcement agency that has jurisdiction over the school property has been or may be notified of the incident. The Administrative Director or designee will document attempts made to reach the parent/guardian.[22][37][43]

Students with Disabilities

When reporting an incident committed by a student with a disability or referring a student with a disability to a law enforcement agency, the school shall provide the information required by state and federal laws and regulations and shall ensure that copies of the special education and disciplinary records of the student are transmitted for consideration by these authorities. The school shall ensure compliance with the Family Educational Rights and Privacy Act when transmitting copies of the student's special education and disciplinary records.[2][3][11][13][44][45]

<u>Monitoring and Management</u>

If a student has an Individualized Management Plan, the threat assessment team shall monitor the Individualized Management Plan and coordinate with the designated team or resource to provide support and follow-up assessment as necessary. Follow-up assessments, referrals, re-entry plans and other supports shall be documented as part of the student's Individualized Management Plan.

The threat assessment team, in coordination with the student's school district of residence, other appropriate teams and supports, shall determine when the student's Individualized Management Plan is no longer needed for disposition of the threat(s), and may transfer appropriate information in accordance with applicable law, regulations and Joint Operating Committee policy.[5][8][10][11][13][28]

Records Access and Confidentiality

In order to carry out their duties and facilitate the timely assessment of and intervention with students whose behavior may indicate a threat, the threat assessment team shall have access to the following student information to the extent permitted under applicable law and regulations:[1]

1. Student health records.[46][47]
2. Prior school disciplinary records.[11][13][48]
3. Records related to adjudication under applicable law and regulations. [48][49][50][51][52][53]
4. Records of prior behavioral or mental health or psychological evaluations or screenings maintained by the school.
5. Other records or information that may be relevant to evaluating a threat or determining treatment or referral options for a student that are maintained by the school.

The threat assessment team shall use all information or records obtained in fulfilling the team's duty in accordance with law to evaluate a threat or to recommend disposition of a threat. Team members shall not redisclose any record or information obtained or otherwise use any record of a student beyond the purpose for which the disclosure was made to the team, in accordance with law.[1]

The threat assessment team shall maintain confidentiality and handle all student records in accordance with applicable law, regulations, Joint Operating Committee policy, the Student Records Plan and the school's legal and investigative obligations.[2][3][5][8][11][12][13][21][48][54]

Threat assessment members whose other assignments and roles require confidentiality of specific student communications, in accordance with law, shall ensure that all confidential communications and information are addressed in accordance with applicable law, regulations, Joint Operating Committee policy and administrative regulations.[12][55][56][57][58]

Annual Joint Operating Committee Report

The threat assessment team shall provide the required information to the Administrative Director, in consultation with the School Safety and Security Coordinator, to annually develop and present to the Joint Operating Committee, at an executive session, a report outlining the school's approach to threat assessment, which shall include:[1]

1. Verification that the school's threat assessment team and process complies with applicable law and regulations.

2. The number of threat assessment teams assigned in the school, and their composition.
3. The total number of threats assessed that year.
4. A summary of interactions with outside law enforcement agencies, juvenile probation and behavioral service providers.
5. An assessment of the school's threat assessment team(s) operation.
6. Recommendations for improvement of the school's threat assessment processes.
7. Any additional information required by the Administrative Director or designee.

The annual threat assessment report shall be presented as part of the annual report to the Joint Operating Committee by the School Safety and Security Coordinator on school safety and security practices.[1][6]

The threat assessment team's information addressing verification of compliance with law and regulations, the number of threat assessment teams assigned in the school and their composition, the total number of threats assessed that year, and additional information required by the Administrative Director or designee shall be included in the School Safety and Security Coordinator's annual report on school safety and security practices that is submitted to the state's School Safety and Security Committee.[1] [6][59]

PSBA Revision 3/26 © 2026 PSBA

Legal References
1. 24 P.S. 1302-E
2. 20 U.S.C. 1232g
3. 34 CFR Part 99
4. 24 P.S. 1301-E
5. Pol. 236
6. Pol. 805.2
7. Pol. 805
8. Pol. 819
9. Pol. 103
10. Pol. 103.1
11. Pol. 113.3
12. Pol. 207
13. Pol. 216
14. Pol. 146.1
15. 24 P.S. 1205.2
16. 24 P.S. 1205.5
17. 24 P.S. 1310-B
18. Pol. 333

	19. Pol. 104 20. Pol. 105.1 21. Pol. 249 22. Pol. 805.1 23. 23 Pa. C.S.A. 6311 24. Pol. 806 25. Pol. 247 26. Pol. 252 27. Pol. 226 28. Pol. 113 29. Pol. 113.1 30. Pol. 113.2 31. Pol. 146 32. Pol. 218 33. Pol. 218.1 34. Pol. 218.2 35. Pol. 233 36. Pol. 709 37. 22 PA Code 10.2 38. 35 P.S. 780-102 39. 24 P.S. 1319-B 40. 22 PA Code 10.21 41. 22 PA Code 10.22 42. 24 P.S. 1306.2-B 43. 22 PA Code 10.25 44. 20 U.S.C. 1415 45. 34 CFR Part 300 46. 24 P.S. 1409 47. Pol. 209 48. Pol. 216.1 49. 24 P.S. 1304-A 50. 24 P.S. 1305-A 51. 24 P.S. 1307-A 52. 42 Pa. C.S.A. 6341 53. Pol. 218.3 54. 24 P.S. 1304-D 55. 22 PA Code 12.12 56. 42 CFR Part 2 57. 42 Pa. C.S.A. 5945 58. 42 Pa. C.S.A. 8337 59. 24 P.S. 1309-B 20 U.S.C. 1400 et seq 35 P.S. 7601 et seq Pol. 203.1 PA Commission on Crime and Delinquency, School Safety and Security Committee Model K-12 Threat Assessment Procedures and Guidelines