ACADEMY OF ACCELERATED LEARNING, INC.
BOARD POLICY MANUAL
POLICY GROUP – SCHOOL SAFETY AND SECURITY
MAINTENANCE OF THREAT ASSESSMENT RECORD
RELATED SAFETY CODE REFERENCE: FFB – STUDENT WELFARE: CRISIS INTERVENTION

Section 1. Purpose of Policy

Through this policy, the Board of Directors (hereafter, the "Board") of Academy of Accelerated Learning, Inc. (hereafter, the "School") establishes requirements for creating, maintaining, safeguarding, accessing, transmitting, retaining, and disposing of records associated with behavioral threat assessment and management. This policy supports consistent case management, continuity of services, required reporting, student privacy, and compliance with applicable law.

Section 2. Applicability

This policy applies to all School campuses, the Superintendent/CEO, the Director of Operations and designated School Safety and Security Coordinator, campus administrators, Threat Assessment Team members, records custodians, technology personnel, counselors, special education personnel, contractors with authorized access, and any other employee responsible for threat assessment documentation or reporting.

Section 3. Records Covered

- Initial reports, referrals, anonymous tips, and supporting evidence.
- Screening and triage decisions, threat assessment instruments, interview notes, risk determinations, and team deliberation records.
- Parent or guardian, employee, law enforcement, emergency responder, and agency notifications.
- Safety plans, intervention plans, referrals, services offered, monitoring notes, follow-up actions, reassessments, and case-closure documentation.
- Training certificates, team rosters, meeting records, annual program data, and required submissions through the Texas Education Agency's designated school-safety system.

Section 4. Documentation Standards

Threat assessment records shall be timely, factual, objective, complete, and limited to information relevant to safety, assessment, intervention, case management, and legal compliance. Records shall identify the source and date of information when known, distinguish verified facts from allegations or observations, document the basis for significant decisions, and record assigned actions and completion dates. Employees shall not maintain unofficial duplicate files or store records in personal accounts, devices, or unapproved applications.

Section 5. Approved Storage and Security

Records shall be maintained in the School's approved student-information, incident, case-management, or state-designated school-safety system, as applicable. Paper records, when necessary, shall be secured in locked storage within an access-controlled area. Electronic records shall be protected through role-based access, unique user credentials, multifactor authentication when available, encryption or other reasonable safeguards, and reliable backup procedures. Access shall be reviewed periodically and removed promptly when personnel change roles or separate from service.

Section 6. Access and Confidentiality

Access shall be limited to personnel with a legitimate educational, safety, legal, reporting, or operational need to know. The School shall protect personally identifiable student information and security-sensitive information in accordance with FERPA, applicable state law, and School policy. Information may be disclosed to parents or guardians, appropriate School officials, law enforcement, emergency responders, receiving schools, service providers, or governmental authorities only as permitted or required by law. The School shall not promise absolute confidentiality when disclosure is necessary to protect health or safety or fulfill a legal duty.

Section 7. Sentinel and Required Reporting

Beginning on the date required by law or commissioner rule, designated Threat Assessment Team members shall use the threat assessment instrument, manual, field guide, and reporting functions provided through Sentinel or a successor system. Campus and district coordinators shall ensure required data are accurate, complete, submitted by applicable deadlines, and reconciled with local case records. Records exported from or submitted through the system shall receive the same confidentiality and security protections as local threat assessment records.

Section 8. Student Transfer and Continuity of Safety Measures

When a student transfers between School campuses or enrolls in another school, authorized personnel shall review applicable law and determine what threat assessment information may or must be communicated to support safety, continuity of interventions, and educational services. Any transmission shall use an approved secure method, be limited to relevant information, and be documented. Whenever practicable, the Threat Assessment Team shall identify active safety measures, monitoring responsibilities, and follow-up needs before the transition.

Section 9. Retention, Legal Holds, and Disposition

Threat assessment records shall be retained in accordance with the School's adopted records-retention schedule and any longer period required by law, litigation hold, audit, investigation, active case-management need, or directive of legal counsel. No employee may alter, conceal, destroy, or dispose of a record subject to an active hold or pending request. At the end of the applicable retention period, records shall be destroyed or deleted using a secure method that prevents reconstruction, and disposition shall be documented when required.

Section 10. Oversight, Review, and Training

The Superintendent/CEO shall designate a district coordinator and records custodian responsible for implementing this policy. The coordinator shall ensure team members receive training on documentation, confidentiality, approved systems, required reporting, records transfer, and retention. At least annually, the School shall review a sample of closed and active records, user access, required submissions, unresolved corrective actions, and alignment with current law and state guidance. Identified deficiencies shall be documented and corrected promptly.

Section 11. Legal References

- Texas Education Code § 12.104(b), provisions applicable to open-enrollment charter schools.
- Texas Education Code § 37.115, Threat Assessment and Safe and Supportive School Program and Team.
- Texas Education Code §§ 37.1083 and 37.115, required school-safety reporting.
- 19 Texas Administrative Code § 103.1213, Required Reporting Through Sentinel.
- Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g, and 34 C.F.R. Part 99.
- Applicable state and local records-retention requirements and schedules.
- Applicable Texas Education Agency and Texas School Safety Center rules, directives, model materials, and guidance.