OFFICE OF THE CHIEF AUDITOR

INTERNAL AUDIT REPORT

BEHAVIORAL THREAT MANAGEMENT TRAINING PROGRAM

FOR THE SCHOOL YEAR 2026-2027

Established 1915
BROWARD
County Public Schools

To be presented to the:

Audit Committee
on November 19, 2026

The School Board of Broward County, Florida
on January 20, 2027

Sarah Leonardi, Chair
Dr. Jeff Holness, Vice Chair

Lori Alhadeff
Maura McCarthy Bulman
Adam Cervera, Esq.
Debra Hixon
Nora Rupert
Rebecca Thompson
Dr. Allen Zeman

Dr. Howard Hepburn
Superintendent of Schools

The School Board of Broward County, Florida, prohibits any policy or procedure which results in discrimination on the basis of age, color, disability, gender identity, gender expression, genetic information, marital status, national origin, race, religion, sex or sexual orientation. The School Board also provides equal access to the Boy Scouts and other designated youth groups. Individuals who wish to file a discrimination and/or harassment complaint may call the Director, Equal Educational Opportunities/ADA Compliance Department & District's Equity Coordinator/Title IX Coordinator at 754-321-2150 or email eeo@browardschools.com.

Individuals with disabilities requesting accommodations under the Americans with Disabilities Act Amendments Act of 2008, (ADAAA) may call Equal Educational Opportunities/ADA Compliance Department at 754-321-2150 or email eeo@browardschools.com.

browardschools.com

TABLE OF CONTENTS

Transmittal Letter 1

Executive Summary 2

Objectives 4

Background 5

Scope and Methodology 9

Attributes Reviewed 11

Observations:

- Observation 1 – Completion of SBTMT Vice Chair Role-Specific Training (Attribute 6) 12
- Observation 2 – Timeliness of Supporting Documentation Uploads for Student Orientation (Attribute 7) 13
- Observation 3 – Timeliness of School-Based Staff Orientation and Documentation Uploads (Attribute 9) 14

Appendices:

- Appendix I – Management Response 15
- Appendix II – SBBC Policy 4380, *Behavioral Threat Management* (amended October 15, 2024) 16
- Appendix III – Florida Administrative Code Rule 6A-1.0019, *Threat Management* (amended May 21, 2026) 26
- Appendix IV – BTM Memorandum, *2026-2027 Behavioral Threat Management Updates*, dated June 17, 2026 30

TRANSMITTAL LETTER

November 12, 2026

Members of the School Board of Broward County, Florida
Members of the School Board Audit Committee
Dr. Howard Hepburn, Superintendent of Schools

In accordance with the School Board of Broward County, Florida ("SBBC" or "District") Audit Plan for the 2026-2027 school/fiscal year and SBBC Policy 4380, *Behavioral Threat Management (BTM)*, the Office of the Chief Auditor ("OCA") conducted a compliance audit of the District's Behavioral Threat Management ("BTM") Training Program for the 2026-2027 school year. The audit assessed the District's and traditional K-12 schools' compliance with requirements for establishing BTM teams, training BTM team members, and providing orientations to students, faculty, and staff. The OCA concluded that the District and traditional K-12 schools generally complied with BTM training program requirements and identified three (3) observations related to the completion of role-specific training and the timeliness of orientation documentation.

Our report is organized into the following sections:

Executive Summary	Brief description of the audit subject area, audit scope and methodology, scope limitations, and results
Objectives	Specific audit objectives
Background	Summary of the audit subject area and the impact to the District and District personnel responsibilities
Scope and Methodology	Audit scope and approach, significant procedures, and the OCA's and District Management's responsibilities
Observations	Observations noted during the audit and recommendations for improvement related to the audited subject areas
Appendices	Supplemental documents

The OCA appreciates the cooperation and assistance provided by the BTM Department and school administrators during this audit.

Respectfully submitted,

Mark Magli
Chief Auditor
Office of the Chief Auditor

EXECUTIVE SUMMARY

The OCA conducted an audit of the District's BTM Training Program for the 2026-2027 school year to assess the District's and traditional K-12 schools' compliance with requirements related to BTM team designation and composition, team member training, and student and staff orientations. The audit was based on SBBC Policy 4380, *Behavioral Threat Management (BTM)*, as amended October 15, 2024 ("BTM Policy"), and Florida Administrative Code Rule 6A-1.0019, *Threat Management*, as amended May 21, 2026 ("Rule 6A-1.0019").

The audit also covered the BTM Department's procedures for overseeing and supporting District-sponsored charter schools; however, testing of individual charter school records was excluded from this audit. The audit of traditional school-level compliance excluded locations that provide only pre-kindergarten or adult education because they do not meet the applicable definition of "school."[1]

Based on its review of the BTM Policy, Rule 6A-1.0019, and the BTM Department's procedures, the OCA identified nine (9) attributes. The attributes focus on the requirements and timelines related to:

- Designation of the Primary and Secondary District Threat Management Coordinators ("DTMCs") and appointment of the District Threat Management Team;
- Appointment of School-Based Threat Management Teams ("SBTMTs") of at least four (4) members with expertise in counseling, instruction, school administration, and law enforcement, including designation of a Chair and Vice Chair;
- Florida Model training, including trainer-specific training for District Florida Model Trainers, Day 1 training for all team members, and, when applicable, Role-Specific and annual refresher training; and
- Annual orientations of students, school board employees, and school-based staff.

A detailed listing of the attributes and related references is provided in the Attributes Reviewed section of this report (page 11).

The review of School-Based Threat Management Team composition and training covered 1,027 team members at 217 traditional K-12 schools. A sample of 30 schools was reviewed for compliance with student and school-based staff orientation requirements.

The OCA noted improvement in the timeliness of required training completion compared to the prior audit (2025-2026 school year). All team members completed Florida Model Day 1 training within the required timeframe, and all team members required to complete refresher training completed it by the October 8, 2026 deadline. All but two (2) of the team members required to complete Role-Specific training did so before the first day of school (August 10, 2026) or, for those appointed later, within 30 school days of appointment, as required. The two members were subsequently replaced on September 15, 2026, with team members who had completed the required training.

The OCA concluded that the District and traditional K-12 schools generally complied with the BTM Policy and Rule 6A-1.0019 requirements related to BTM team designation and composition, team member training, and student and staff orientations. The OCA also noted that the

[1] The definition of 'school' is provided in the Scope and Methodology section on page 9.

EXECUTIVE SUMMARY – Continued

BTM Department has established procedures to communicate BTM requirements to District-sponsored charter schools and to escalate instances of noncompliance.

Summary of Results

The OCA identified no exceptions for Attributes 1–5 and 8 and three (3) observations related to Attributes 6, 7, and 9. The issues noted were classified as observations rather than findings because they either involved a small number of instances or related to internal departmental deadlines rather than to policy or state requirements. In addition, the BTM Department maintains monitoring controls that mitigate the risk of noncompliance: it establishes internal deadlines to support timely completion and documentation, regularly reminds schools of training, orientation, and documentation requirements, and monitors submissions. A summary of the observations is presented in Table 1 below. Detailed results are included in the Observations section of this report (page 12).

Table 1. Summary of Observations

Observations		Details	Responsible Party
1	**Completion of SBTMT Vice Chair Role-Specific Training (Attribute 6)**	Two (2) of the 656 SBTMT members[2] (0.3%) required to complete Role-Specific training, both serving as Vice Chairs, completed Florida Model Day 1 training but did not complete the Role-Specific training before the first day of school (August 10, 2026). Both employees were replaced on September 15, 2026, with team members who had completed all required training.	Principals
2	**Timeliness of Supporting Documentation Uploads for Student Orientation (Attribute 7)**	All 30 reviewed sample schools conducted student orientation within the required timeline. However, seven (7) schools (23%) uploaded supporting documentation to the BTM SharePoint site one to three days after the August 18, 2026 deadline established by the BTM Department.	Principals
3	**Timeliness of School-Based Staff Orientation and Documentation Uploads (Attribute 9)**	All 30 reviewed sample schools conducted school-based staff orientation. However, one (1) school (3%) conducted it on August 11, one school day after school started on August 10, and ten (10) schools (33%) uploaded supporting documentation one to eight days after the BTM Department's August 11, 2026 deadline. In addition, sign-in sheets for two (2) schools did not document the orientation date; both schools later provided documentation confirming timely orientation.	Principals

[2] The 656 team members include individuals appointed during the review period to replace Chairs, Vice Chairs, or Principals.

OBJECTIVES

The purpose of this audit was to assess the District's and traditional K-12 schools' compliance with the BTM Policy and Rule 6A-1.0019, particularly the requirements related to BTM team designation and composition, team member training, and student and staff orientations.

The specific objectives of this audit were to:

- Obtain an understanding of the requirements for BTM team assignments and training during the period under review, with emphasis on changes in state law and rules, and District policy since the prior audit.
- Obtain an understanding of the District's systems and applications used to manage and document BTM team assignments and training completion.
- Develop detailed review attributes based on applicable state law and rules, District policy, and established practices and procedures.
- Review compliance with BTM training program requirements for traditional K-12 schools and District-level responsibilities using the developed attributes.
- Evaluate the District's procedures for overseeing and supporting District-sponsored charter schools related to BTM training program requirements.
- Determine whether improvements to established practices and procedures are warranted and provide recommendations to District administration, as appropriate.

BACKGROUND

The BTM process is governed by the BTM Policy, which incorporates the requirements of Rule 6A-1.0019. The BTM Policy does not reflect changes in Rule 6A-1.0019 amended on May 21, 2026. The changes included the requirement for the District Florida Model Trainers to complete the additional training specific to the trainer role. The key requirements and related timelines are summarized below:

- **Team Assignments:** The Primary and Secondary District Threat Management Coordinators ("DTMCs") and District Threat Management Team ("DTMT") are designated by the Superintendent, and the School-Based Threat Management Teams ("SBTMT" or "BTM team") are assigned by the Principals before the first day of school. Schools are required to promptly report any changes to BTM team assignments to the BTM Department staff.

- **Team Training:** Each of the assigned team members who have not previously completed the Florida Model training must complete it before the start of the school year. If appointed as a BTM team member after the start of the school year, the employee must complete training within 30 school days of appointment. The Office of Safe Schools ("OSS") at the Florida Department of Education mandated the following training courses for the 2026-2027 school year:

Florida Model Training Day 1	Role-Specific Training
8-hour course required for every member of the team	4-hour course required for Chair, Vice Chair and the Principal
Florida Model Day 1 and Role-Specific in-person trainings are provided by the BTM Department's state-certified instructors. The training registrations are completed in the District's application Learning Across Broward ("LAB")[3]. Each participant must complete a survey to report completion of the course to the OSS. The OSS issues certificate upon receipt of the survey.	
Florida Model Refresher Training	
Mandatory for anyone trained on the Florida Model before July 1, 2026. The course is provided online by the OSS and must be completed within the first 60 days of school by October 8, 2026.	

- **DTMC Training:** The Primary and Secondary DTMC must complete additional training specific to the coordinator role.

[3] LAB is Broward County Public Schools' professional-learning system platform for employees.

BACKGROUND – Continued

- **District Florida Model Trainers:** The district Florida Model Trainers must complete additional training specific to the Trainer role.

- **Team Training Verification:** Each school Principal is required to submit a verification form to the BTM Department prior to the first day of school. The form identifies the BTM team assignments and attests that all team members completed the applicable training requirements prior to the start of the 2026-2027 school year. The BTM Department maintains a database of Principal Verification Forms. Schools must upload copies of all BTM team members' certificates to a SharePoint site.

- **School Board Employees Orientation:** The District assigns the *Warning Signs Annual Review 2026-2027* course to all District employees in LAB as part of the 2026-2027 Annual Mandatory Compliance training. Employees must complete the course by October 31, 2026.

- **Student and School-based Staff Orientations:** Schools are required to orient students and school-based staff on recognizing concerning behaviors or threats and to whom these should be reported.

  Student Orientations: The schools are required to orient students on threat reporting within the first ten days of school. The schools must utilize the content provided by the BTM Department. Each school must upload evidence of completion (lesson plans, student assembly agenda, etc.) to the BTM SharePoint site by August 18, 2026.

  School-based Staff Orientations: The schools are required to present the *Florida Model: Awareness for All School Staff Training* to the school-based staff prior to the first day school is in session. The schools must upload sign-in sheets for all participating staff with a handwritten signature for all attendees to the BTM SharePoint site by August 11, 2026.

Responsibilities

The district's BTM Department is responsible for policy updates, training, and support for school-based personnel. The director of the BTM Department is designated as the DTMC. The DTMC oversees threat management at all schools, including District-sponsored charter schools, and serves as Chair of the District threat management team. The DTMC must ensure that all district-level and school-level threat management team members are trained in threat management and on the Florida Model. The DTMC also facilitates access to the Florida School Safety and Threat Management Portal for all BTM team members.

The school principals are responsible for appointing school-based threat management team, verifying that all appointed team members at their location are fully trained, and ensuring that any changes to the team are reported to the BTM Department.

BACKGROUND – Continued

Charter School Oversight and Support

Based on documentation the BTM Department provided, the OCA noted that the BTM Department communicates BTM requirements, procedures, training resources, meeting materials, and compliance expectations to District-sponsored charter schools through the same channels it uses for traditional K-12 schools. These channels primarily include a dedicated BTM course in Canvas[4], monthly All Chair meetings and Hot Labs. The Canvas course contains announcements and reminders; BTM newsletters; updated Florida Threat Management Model materials, including the manual, forms, State Rule, and workflow; PIVOT memoranda; recordings and presentations from All Chair meetings and Hot Labs; student and school-based staff training presentations; and charter and external Warning Signs training. In addition, the BTM Department presented at charter principal meetings in July and September 2026.

The BTM Department has also established a tiered notification and escalation process for charter school noncompliance. Upon initial noncompliance, the BTM Department sends an email identifying the incident and related deficiencies to the charter school mailbox, principal, team chair, and the District's Charter Schools Management/Support Department. For repeated noncompliance, the BTM Department also notifies the school's governing board and issues a memorandum identifying all incidents and deficiencies and requiring the school to document its corrective action steps. Instances of egregious noncompliance, such as falsified records or signatures, are reported to the parties identified above and the Florida Department of Education's Office of Safe Schools.

Prior Audit

The OCA previously reviewed the BTM Training Program for the 2025-2026 school year. The audit report was issued on January 22, 2026; transmitted by the Audit Committee on January 29, 2026; and received by the Board on March 10, 2026. The report identified the following issues:

- **Training Completeness and Timeliness (Attribute 6)**

  2 of 1,109 team members did not complete required additional training (Role-Specific or refresher).

  22 of 1,109 team members completed required training late: 3 completed Florida Model Day 1 training late, and 19 completed Role-Specific training late.

[4] Canvas is a learning management system, an online platform made by Instructure. Schools and districts use it to host courses, post announcements and share materials.

BACKGROUND – Continued

Prior Audit (continued)

- **Student Orientation Documentation Uploads (Attribute 7)**

  3 of 229 locations did not upload supporting documentation for student orientations to the BTM SharePoint folder.

- **Staff Orientation Timeliness (Attribute 9)**

  3 of 229 locations did not conduct the school-based staff orientation before the first day of school, as required; however, all three completed the orientation within the first week of school.

SCOPE AND METHODOLOGY

This audit focused on the designation and appointment of the DTMCs, the DTMT, and SBTMTs; required training of District Florida Model Trainers, DTMCs, and District and school-based BTM team members; and orientations of students, school board employees, and school-based staff for the 2026-2027 school year. The audit scope did not include a review of individual charter school records.

Based on the *SY 2026-2027 BCPS Schools Master List*[5] as of August 20, 2026, the District had 221 traditional school locations. The OCA excluded four (4) locations that provide only pre-kindergarten or adult education because they do not fall under the purview of Rule 6A-1.0019 and Policy 4380. Policy 4380 states, "'School' means a public K-12 school […]." The resulting population consisted of 217 traditional K-12 schools. The review of SBTMT composition and training (Attributes 3 and 6) covered all 1,027 team members at these 217 schools.

To test compliance with student and school-based staff orientation requirements (Attributes 7 and 9), the OCA selected a risk-based sample of 30 schools. First, the OCA included the six (6) schools with issues found for Attributes 7 and 9 in the prior audit.[6] To focus testing on locations with a higher risk of threats and concerning behavior, the OCA then excluded 132 elementary schools from the remaining 211 schools and randomly selected 24 schools from the remaining 79 middle, high, K-12, and center locations. The final sample consisted of four (4) centers, three (3) elementary schools (all from the prior-audit group), nine (9) high schools, one (1) K-12 school, and 13 middle schools.

The procedures used to satisfy the objectives in this review included the following:

- Reviewed the District's BTM Policy and Florida Administrative Code Rule 6A-1.0019 effective during the audit period.
- Reviewed corrective action plans issued by management in response to findings in the prior audit of BTM Training Program for the school year 2025-2026.
- Met with the BTM Department management to obtain an understanding of the procedures, established practices, and sources of the documentation, including updates and changes since the prior audit.
- Prepared a listing of detailed attributes to examine existing practices against the requirements for the BTM roles, training and orientations.
- Obtained electronic data from relevant District databases and applications, along with supporting documentation, to evaluate compliance in the following areas:

[5] The *SY 2026-2027 BCPS Schools Master List* is maintained by the Office of the Deputy Superintendent and contains information on traditional schools.
[6] In the OCA's audit of the 2025-2026 BTM Training Program, three (3) schools did not upload supporting documentation for student orientations (Attribute 7: student orientation within the first ten days of school), and three (3) did not conduct staff orientation before the first day of school (Attribute 9: staff orientation before the first day of school).

SCOPE AND METHODOLOGY – Continued

- District / School BTM Roles (Attributes 1, 2, 3) – whether the DTMCs were designated and reported to the Office of Safe Schools, and whether the DTMT and SBTMTs were appointed with the required members, Chair, and Vice Chair.

- BTM Training (Attributes 4, 5, 6) – whether District Florida Model Trainers and BTM team members completed required training.

- School Board Employee Orientation (Attribute 8) – whether the District provided the required Warning Signs training to school board employees. The OCA reviewed the District-wide memorandum communicating the 2026-2027 Annual Mandatory Compliance training requirements and the LAB registration and completion report for the *Warning Signs Annual Review 2026-2027* course as of September 1, 2026. Because the objective was to determine whether the District provided the training, rather than to assess employee completion, the OCA did not test completion against the October 31, 2026 deadline.

- Examined documents uploaded by the selected sample of 30 schools to the BTM SharePoint site to determine whether each sample school provided orientations to students and school-based staff on recognizing concerning behaviors or threats and the reporting options (Attributes 7 and 9).

- Obtained additional documentation from the BTM Department and from the schools that did not upload documentation to the BTM SharePoint site.

- Reviewed BTM Department's procedures for support and oversight of District-sponsored charter schools related to BTM training program requirements.

- Prepared a written report on audit results. Reviewed the results with the BTM Department and senior management.

The audit was conducted in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The OCA is responsible for providing recommendations to improve operations, strengthen internal controls, and comply with the requirements of laws, rules, and regulations in matters selected for review. The District's management is responsible for implementing corrective actions and complying with applicable laws, regulations, and School Board policies and procedures.

Audit supervised and reviewed by:

Nakia Gouldbourne, Audit Director
Elena Pritykina, Audit Manager

Audit performed by:

Beverly Mungal, Auditor

ATTRIBUTES REVIEWED

The OCA tested the following attributes, each representing a specific requirement established by the BTM Policy, Rule 6A-1.0019, or the BTM Department's procedures:

		Attributes	Policy 4380[3]
District / School BTM Roles	1	Did the District Superintendent designate Primary and Secondary District Threat Management Coordinators (DTMC) and report their names, phone numbers, and email addresses to the Department of Education's Office of Safe Schools by July 1?	III
	2	Did the District Superintendent appoint a District Threat Management Team (DTMT) before the start of the school year[1]?	IV(A),V(B)
	3	Did the school principal, or the equivalent administrative head, appoint members to the School-Based Threat Management Team (SBTMT) before the start of the school year[1], ensuring the team consisted of at least four (4) members with expertise in counseling, instruction, school administration, and law enforcement, and designate an SBTMT Chair and Vice Chair?	IV(B),V(B)
BTM Training	4	Did the District Florida Model Trainers complete the additional training specific to the trainer role?	Rule (4)(g)d[4]
	5	Did all DTMT members complete state required training before the start of the school year[1] or within 30 school days of appointment for the new team members?	V(A)(B)(C)
	6	Did all SBTMT members complete state required training before the start of the school year[1] or within 30 school days of appointment for the new team members?	V(A)(B)(C)
	7	Did the school orient **students** within the first ten (10) days school is in session[2] on recognizing concerning behaviors or threats and to whom concerning behaviors or threats should be reported?	IX(A)
	8	Did the district orient **school board employees** through the required Warning Signs training?	IX(B)
	9	Did the school orient **school-based staff** prior to the first day of school[1] on recognizing concerning behaviors or threats and to whom the concerning behaviors or threats should be reported?	IX(B)

(1) August 10, 2026 - First day of school for the 2026-27 school year

(2) August 10, 2026 through August 21, 2026

(3) SBBC Policy 4380, Behavioral Threat Management (BTM) as amended on October 15, 2024

(4) Rule 6A-1.0019, Florida Administrative Code (F.A.C.) as amended on May 21, 2026

OBSERVATIONS

Observations are matters that came to the OCA's attention during the audit that do not rise to the level of a finding but warrant management's attention. The BTM Department establishes internal deadlines to support timely completion and documentation, regularly reminds schools of applicable requirements, and monitors submissions. Because of these monitoring controls, and because the issues noted either involved a small number of instances or related to internal departmental deadlines rather than to policy or state requirements, the OCA reported the following matters as observations. The accompanying recommendations are intended to further strengthen existing processes.

Observation 1 | Completion of SBTMT Vice Chair Role-Specific Training (Attribute 6)

The OCA reviewed training records for 1,027 employees serving on School-Based Threat Management Teams ("SBTMTs") across 217 schools to determine whether team members completed the state-required training before the start of the 2026-2027 school year (August 10, 2026) or within 30 school days of appointment for newly assigned members, as required by BTM Policy Sections V(A)–(C) (Attribute 6).

The review found that two (2) SBTMT members serving as Vice Chairs completed Florida Model Day 1 training but had not completed the required Role-Specific training before the first day of school, as required. These members represented 0.3% of the 656 team members[7] required to complete Role-Specific training. Subsequently, both employees were replaced on September 15, 2026, with team members who had completed the required training.

While the review identified only a limited number of instances where Role-Specific training requirements were not met, the results indicate an opportunity to strengthen procedures for verifying completion of all required training components before individuals are assigned to designated SBTMT roles.

Process Improvement Recommendation

The OCA recommends that school principals verify that individuals assigned to designated SBTMT roles have completed all required training components within the timeframes established by BTM Policy.

[7] The 656 team members include individuals appointed during the review period to replace Chairs, Vice Chairs, or Principals.

OBSERVATIONS – Continued

Observation 2 | Timeliness of Supporting Documentation Uploads for Student Orientation (Attribute 7)

The OCA reviewed 30 sample schools to determine whether students received the required orientation on recognizing concerning behaviors or threats, and on identifying to whom they should be reported, within the first ten (10) days that school was in session, in accordance with BTM Policy Section IX(A) (Attribute 7). The OCA also reviewed whether schools uploaded supporting documentation to the BTM SharePoint site by August 18, 2026, the deadline established in the BTM Department's memorandum, *2026-2027 Behavioral Threat Management Updates*, dated June 17, 2026.[8]

All 30 schools provided evidence that the orientation was conducted within the required ten-day period (August 10–21, 2026). However, seven (7) schools (23%) uploaded supporting documentation one to three days after the BTM Department's August 18, 2026 deadline. All documentation was uploaded by August 21, 2026.

Although all required orientations were conducted on time, the late uploads indicate an opportunity to strengthen monitoring to promote timely submission of supporting documentation.

Process Improvement Recommendation

The OCA recommends that school principals establish procedures to ensure that supporting documentation for required student orientations is uploaded to the designated BTM SharePoint site by the internal deadline established by the BTM Department.

[8] The BTM Department set the upload deadline of August 18, 2026, ahead of the August 21, 2026 end of the required ten-day orientation period, because it shortened the target for completing the orientation to five (5) days (August 14, 2026) to help schools meet the ten-day requirement. The OCA assessed compliance only against the ten-day requirement in BTM Policy Section IX(A). All but one of the 30 sample schools completed the orientation by the five-day target (August 14, 2026). The remaining school completed its orientation on August 18, 2026, within the ten-day period.

OBSERVATIONS – Continued

Observation 3	Timeliness of School-Based Staff Orientation and Documentation Uploads (Attribute 9)

The OCA reviewed 30 sample schools to determine whether school-based staff received the required orientation prior to the first day of school on recognizing concerning behaviors or threats and identifying to whom such behaviors or threats should be reported, in accordance with BTM Policy Section IX(B) (Attribute 9). The OCA also reviewed whether schools uploaded sign-in sheets and supporting documentation to the BTM SharePoint site by August 11, 2026, the deadline established in the BTM Department's memorandum, *2026-2027 Behavioral Threat Management Updates*, dated June 17, 2026.

All 30 schools provided evidence that the required orientation was conducted. However, the OCA noted the following:

- **Orientation timeliness:** One (1) school (3%) conducted the required orientation on August 11, 2026, one school day after the first day of school (August 10, 2026).
- **Upload timeliness:** Ten (10) schools (33%) uploaded supporting documentation one to eight days after the August 11, 2026 deadline.
- **Documentation completeness:** At two (2) schools, the uploaded sign-in sheets did not document the date the orientation was presented. As a result, the OCA could not initially verify timeliness from the sign-in sheets. Upon the OCA's request, both schools provided additional supporting documentation, including meeting agendas, demonstrating that the orientations were conducted within the required timeframe.

While the exceptions were limited and documentation was ultimately submitted for all schools, the results indicate an opportunity to strengthen procedures for scheduling and documenting staff orientations and for submitting supporting documentation on time.

Process Improvement Recommendation

The OCA recommends that school principals establish procedures to ensure that required school-based staff orientations are conducted before the first day of school, that sign-in sheets document the date the orientation was presented, and that supporting documentation is uploaded to the designated BTM SharePoint site by the deadline established by the BTM Department.

Established 1915
BROWARD
County Public Schools

SAFETY, SECURITY & EMERGENCY PREPAREDNESS DIVISION
MICHAEL G. GREGORY
CHIEF SAFETY & SECURITY OFFICER

PHONE: 754-321-2655 **EMAIL:** michael.gregory@browardschools.com

November 9, 2026

TO: Mark Magli
Chief Auditor, Office of the Chief Auditor

FROM: Michael G. Gregory
Chief Safety and Security Officer MGG
MGG

SUBJECT: **MANAGEMENT RESPONSE – BEHAVIORAL THREAT MANAGEMENT (BTM) TRAINING PROGRAM AUDIT (SY 2026-2027)**

Response

I appreciate the Office of the Chief Auditor (OCA) for its thorough review of the Behavioral Threat Management Training Program and for its continued partnership in strengthening districtwide compliance and accountability. The audit resulted in no findings and reflects a high level of compliance with applicable requirements, including 100% timely completion of required student orientation among the schools reviewed and 99.7% completion of Role-Specific training by required team members.

I also want to recognize the Behavioral Threat Management Department and our School-Based Threat Management Teams for their diligence, professionalism, and commitment to fulfilling these important training responsibilities. Their collective efforts strengthen the District's behavioral threat management capability, promote greater consistency and fidelity in implementing the Florida behavioral threat management model, and ultimately enhance our ability to identify, assess, and respond appropriately to potential threats while supporting safe and secure learning environments for our students and staff.

MGG: tj

Signature: Michael G. Gregory
Michael G. Gregory (Nov 9, 2026 16:15:04 EST)
Email: michael.gregory@browardschools.com

Policy 4380

BEHAVIORAL THREAT MANAGEMENT (BTM)

THE SCHOOL BOARD OF BROWARD COUNTY (SBBC), FLORIDA IS COMMITTED TO PROTECTING ITS STUDENTS, EMPLOYEES, AND MEMBERS OF THE COMMUNITY. IT IS ESSENTIAL THAT DISTRICTWIDE VIOLENCE PREVENTION BE IN PLACE TO FOSTER A LEARNING ENVIRONMENT THAT PROMOTES A CULTURE OF SAFETY, RESPECT, TRUST, AND SOCIAL/EMOTIONAL SUPPORT, WHILE ALSO PROTECTING STUDENTS AND STAFF FROM CONDUCT THAT POSES AN ACTUAL OR PERCEIVED THREAT TO SELF OR OTHERS. THE BEHAVIORAL THREAT MANAGEMENT (BTM) POLICY SHOULD BE INTERPRETED AND APPLIED CONSISTENTLY WITH ALL APPLICABLE STATE AND FEDERAL LAWS, AND THE BOARD'S COLLECTIVE-BARGAINING AGREEMENTS. THE POLICY WAS DEVELOPED IN ACCORDANCE WITH THE LEGISLATION ENACTED BY THE STATE OF FLORIDA AND SET FORTH IN STATE BOARD OF EDUCATION RULE 6A-1.0019 – THREAT MANAGEMENT.

THE PURPOSE OF THIS POLICY IS TO SET FORTH REQUIREMENTS RELATING TO THREAT MANAGEMENT, A PROCESS BY WHICH SCHOOL DISTRICTS, K-12 SCHOOLS, CHARTER SCHOOL GOVERNING BOARDS, AND CHARTER SCHOOLS IDENTIFY, ASSESS, MANAGE, AND MONITOR POTENTIAL AND REAL THREATS TO STUDENT SAFETY.

SECTION I: DEFINITIONS

A. **"Florida Harm Prevention and Threat Management Model"** or **"Florida Model"** means the Florida-specific behavioral threat management process required by Section 1001.212(12), F.S. The Florida Model consists of the Florida Threat Management Manual and the Florida Harm Prevention and Threat Management Instrument ("Instrument"). Under the Florida Model, threats and reports of concerning behavior or concerning communications are categorized as having an unfounded, low, medium, or high level of concern.

B. **"School"** means a public K-12 school, including a charter school, with a Master School Identification Number (MSID) number as provided under Rule 6A-1.0016, F.A.C., but does not include:

1. Settings where instruction is provided in a county jail or state prison, in a Department of Juvenile Justice facility or program, in a hospital, or while a student is homebound;

2. Schools that provide only prekindergarten or adult education;
3. Technical centers under Section 1004.91, F.S. A list of schools meeting this definition will be provided to the School Safety Specialists by December 1, 2023, and annually thereafter by July 1.

C. **"School-based mental health services provider"** means a school psychologist certified under Rule 6A-4.0311, F.A.C., a school social worker certified under Rule 6A-4.035, F.A.C., a school counselor certified under Rule 6A-4.0181, F.A.C., or a mental health professional licensed under Chapter 490 or 491, F.S., who is employed or contracted by a district or school to provide mental health services in schools.

D. **"School district"** or **"district"** means a Florida school district, the Florida Virtual School (Section 1002.37, F.S.), the Florida School for the Deaf and the Blind (Section 1002.36, F.S.), Developmental Research (Laboratory) Schools (Section 1002.32, F.S.), and charter schools sponsored by a university or Florida College System institution (Section 1002.33(5), F.S.).

E. **"Student Support Management Plan"** or **"SSMP"** means an ongoing intervention and monitoring plan implemented by the school-based threat management team. The SSMP may impose requirements on a student of concern for a defined period of time based on the level of concern. The SSMP is reviewed each month by the School Based Threat Management Team (SBTMT).

F. **"Threat Assessment"** means the identification of individuals exhibiting threatening or other concerning behavior.

G. **"Threat Management"** means the multipart process by which schools identify individuals exhibiting threatening or other concerning behavior, assess the risk of harm, and coordinate appropriate interventions and services for such individuals, as provided in Section 1006.07(7), F.S.

SECTION II: NOTIFICATIONS

A. Parental notification is required in the following circumstances and must adhere to the timelines set forth in Rule 6A-1.0019:
1. If the SBTMT Chair determines the report of a concerning behavior or threat is a Low level of concern and summarily closes the case, the Chair or designee must notify the parent or guardian of the student of concern before the end of the school day.
2. If the Chair does not summarily close the case and refers it to the SBTMT, reasonable efforts must be made to notify the student of concern's parent or guardian on the same day the SBTMT assigns the preliminary level of concern.
3. If the preliminary level of concern is High, there must be an immediate attempt by the chairperson of the SBTMT to notify the parent/guardian of the student of concern before the end of the school day.

4. Parents or guardians must also be notified if the threat management process reveals information about their student's mental, emotional, or physical health or well-being, or results in a change in related services or monitoring, including but not limited to implementation of an SSMP.
5. Once an SSMP is finalized and anytime it is substantively revised, the SBTMT Chair or designee must provide a copy of the SSMP to the student of concern's parent or guardian. The targeted student's parent or guardian should also be informed that an SSMP has been implemented.
6. Where a report of concern includes an identified student target, the Chair must make a reasonable effort to notify the parent or guardian of the targeted student before the end of the school day that the report was received unless the Chair has determined the concern is unfounded. As provided for in the Florida Harm Prevention and Threat Management Manual (Form OSS-001), the unfounded summary disposition should only be used when it is clear and articulable that there is no basis for concern. If there is any doubt, the case should be forwarded to the School Based Threat Management Team for further evaluation and parent notification should occur. Nothing herein prevents the school from notifying parents or guardians if they believe it is in the best interest of the student.

B. "Reasonable effort to notify" means the exercise of reasonable diligence and care to make contact with the student's parent or guardian, typically through the contact information shared by the parent or guardian with the school or school district. The SBTMT Chair or designee must document all attempts to make contact with the parent or guardian.

C. Timelines for required notice may be modified where the SBTMT reasonably believes and documents that such disclosure would result in abuse, abandonment, or neglect, as defined in Section 39.01, F.S.

D. Education records. Threat assessments and records related to threat management are considered education records as defined by the Family Educational Rights and Privacy Act (FERPA) and Sections 1002.22 and 1002.221, Florida Statutes. Policies relating to access, maintenance, and retention of these records must be consistent with Rule 6A-1.0955, F.A.C., Education Records.

SECTION III: DISTRICT THREAT MANAGEMENT COORDINATOR

A. District Threat Management Coordinator (DTMC). The superintendent shall designate a Threat Management Coordinator to oversee threat management at all public K-12 schools, including charter schools sponsored by or under contract with the district.

1. The DTMC must:
    a. Ensure that all district-level and school-level threat management team personnel are trained in threat management and on the Florida Model.

b. Serve as Chair of the District Threat Management Team and as the liaison to the Department of Education's Office of Safe Schools ("Office"); and

c. Assist School Based Threat Management Teams in the district.

2. The superintendent shall report the name, phone number, and email address of the District Threat Management Coordinator to the Office at FloridaModel@fldoe.org. This information must be reported annually by July 1, and must be updated within one (1) school day if there is a change in the information provided.

SECTION IV: DISTRICT THREAT MANAGEMENT TEAM (DTMT) & SCHOOL BASED THREAT MANAGEMENT TEAMS (SBTMT)

A. **District Threat Management Team (DTMT).** The superintendent shall designate a District Threat Management Team that will receive referrals from the School Based Threat Management Teams, assess serious situations, and provide support to school-based teams, including charter schools in their district. The DTMT must include the District Threat Management Coordinator as Chair, persons from school district administration and persons with expertise in counseling, instruction, and law enforcement.

B. **School Based Threat Management Team (SBTMT).** Each school must have an SBTMT comprised of four (4) members, at a minimum, including persons with expertise in counseling, instruction, school administration, and law enforcement. The principal or equivalent administrative head of the school is responsible for appointing team members. The SBTMT must also include a member with personal knowledge of the student of concern who is the subject of threat management. Team members must meet the following requirements:

1. The **counseling team member** must be a school-based mental health services provider that is able to access student mental health records.
2. The **instructional team member** must meet the definition of instructional personnel under Section 1012.01(2)(a)-(d), F.S., or must hold a current Florida Educator Certificate under Section 1012.56, F.S.
3. The **school administrator team member** must meet the definition of administrative personnel found in Section 1012.01(3), F.S. This should not be the school principal, or equivalent, unless they are the only administrator at the school.
4. The **law enforcement team member** must be a sworn law enforcement officer, as defined by Section 943.10(1), F.S., including a School Resource Office, school-safety officer, or other active law enforcement officer. At a minimum, a law enforcement officer serving on a threat management team must have access to local Records Management System information, the Criminal Justice Information System, and the Florida Crime Information

Center and National Crime Information Center databases. Officers serving on school-based threat management teams must also have clearance to review Criminal Justice Information and Criminal History Record Information.

a. A school guardian, as defined under Section 1006.12(3), F.S., or a school security guard, as defined under Section 1006.12(4), F.S., may not serve as the law enforcement member of a threat management team.

5. If none of the team members are familiar with the student of concern, the SBTMT Chair must assign a member of the school's staff who is familiar with the student to consult with and provide background information to the threat management team. The person must be instructional or administrative personnel, as defined in Section 1012.01(2) and (3), F.S. Consulting personnel do not have to complete Florida Model training and may not participate in the decision-making process.

6. **Threat Management Chair and Vice Chair.** The principal of each school must appoint a Chair and Vice Chair of the SBTMT. The Chair serves as the point person for threat management at the school-level and is responsible for triaging reported threats or concerning behavior and communications to determine whether the matter should be summarily closed or whether it should be reviewed by the full SBTMT.

7. **Instrument.** Each SBTMT and DTMT must use the Florida Model to assess the behavior of students who may pose a threat of harm to themselves or others and to coordinate intervention and services for such students. All reported threats or concerning behaviors and communications, even those determined to be unfounded, must be documented by the SBTMT in the required electronic platform along with any resultant action, using the Florida Model Instrument. The chairperson must complete the Intake and Disposition Form, assess the concern for factual basis, and decide whether to convene the SBTMT as soon as possible but no later than the next school day from the day the initial report was received by the chairperson.

a. For levels of concern that are preliminarily determined to be low by the SBTMT, in addition to the requirements outlined in the Florida Harm Prevention and Threat Management Manual the following must be completed by an individual that completed the Day 1 Florida Model training-

1. Initial Interview with student of concern
2. Initial Interview of student of concern's parent/guardian
3. Target/Witness interviews
4. Review of student background information including attendance and academic history
5. The teacher/staff questionnaire must be sent to all of the student's current teachers to be completed and returned prior to final disposition meeting. If a teacher is unavailable to complete the form, the team will

proceed to make a final level of concern determination without the questionnaire.

b. For levels of concern that are preliminarily determined to be medium by the SBTMT, in addition to the requirements outlined in the Florida Harm Prevention and Threat Management Manual the following must be completed by an individual that completed the Day 1 Florida Model training-

1. Initial Interview with student of concern
2. Initial Interview of student of concern's parent/guardian
3. Target/Witness interviews
4. Review of student background information including attendance and academic history
5. For events involving the possession or use of a weapon, a Daily Person/Possession Check must be implemented (remains in place for the duration of the active SSMP)

c. For levels of concern determined to be medium, the following actions must be implemented and documented in the final SSMP:

1. For events involving the possession or use of a weapon, a Daily Person/Possession Check must be implemented (remains in place for the duration of the active SSMP)
2. Referral to Social Worker
3. The teacher questionnaire must be sent to the student's current teachers to be completed and returned prior to final disposition meeting. If a teacher is unavailable to complete the form, the team will determination without the questionnaire.

d. For levels of concern that are preliminarily determined to be high by the SBTMT, in addition to the requirements outlined in the Florida Harm Prevention and Threat Management Manual, the following must be completed by an individual that completed the Day 1 Florida Model training-

1. Initial Interview with student of concern
2. Initial Interview of student of concern's parent/guardian
3. Target/Witness interviews
4. Review of student background information including attendance and academic history
5. Interim Student Support Management Plan (SSMP)
6. Mental Health Parent/Guardian Interview
7. Mental Health Student of Concern Interview
8. The teacher/staff questionnaire must be sent to all of the student's current teachers to be completed and returned prior to final disposition meeting. If a teacher is unavailable to complete the form, the team will proceed to make a final level of concern determination without the questionnaire.

e. For levels of concern preliminarily determined to be high, the

following actions must be implemented and documented in the interim SSMP:

1. Daily Person/Possession Check (remains in place for the duration of the active SSMP)
2. No backpack allowed (remains in place for the duration of the active SSMP)
3. Additional bag(s) (lunch, athletic, etc.) are not allowed unless approved by the school principal (remains in place for the duration of the active SSMP)

f. For levels of concern determined to be high, the following actions must be implemented and documented in the final SSMP:

1. Daily Person/Possession Check (remains in place for the duration of the active SSMP)
2. Referral to school-based Collaborative Problem Solving Team
3. No backpack allowed (remains in place for the duration of the active SSMP)
4. Additional bag(s) (lunch, athletic, etc.) are not allowed unless approved by the school principal (remains in place for the duration of the active SSMP)
5. Referral to Social Worker

8. **Meetings.** Each SBTMT must meet as often as needed to fulfill its duties of assessing and intervening with students whose behavior may pose a threat of harm to themselves or others, but no less than monthly.
   a. Threat management teams must maintain documentation of their meetings, including meeting dates team members in attendance, cases discussed, and actions taken.
   b. DTMTs must meet as needed to review and consult with SBTMTs and must meet timeframes set forth in the Florida Threat Management Manual.

C. **Referrals to Mental Health Services**. The department of Student Services shall notify all school personnel who have received training pursuant to Section 1012.584(4), F.S., of mental health services, including referrals for self-harm consistent with Section 394.463, F.S., that are available in the school district and the individual to contact if a student needs services. The term "mental health services" includes, but is not limited to, community mental health services, health care providers, and services provided under ss.1006.04.

D. **District Mental Health Coordinator.** The District Mental Health Coordinator will track all students with a high level of concern.

SECTION V: TRAINING

A. All members of SBTMTs and DTMTs must be trained on the Florida Model through training provided by or approved by the Office of Safe Schools, as follows:
   1. All SBTMT and DTMT members must complete basic Florida Model training.
   2. The District Threat Management Coordinator must complete additional training specific to the Coordinator role.
   3. School principals, the Threat Management Chair, and the Vice Chair must complete additional training specific to their respective roles.

B. District and school-level teams must be designated before the start of the school year. Team members who have not previously completed training must complete Florida Model training before the start of the school year. Those appointed to threat management teams after the start of the school year must complete Florida Model training within thirty (30) school days of appointment to the School-based Threat Management Team.

C. District and school-level team members who have been fully trained in a previous school year must complete an annual refresher training provided by the Office of Safe Schools within the first sixty (60) days of school.

D. Charter Schools. Charter schools are responsible for establishing SBTMTs and conducting threat assessments as required by Rule 6A-1.0019. DTMCs and DTMTs must oversee and support charter schools sponsored by or under contract with the district to the same extent they do for traditional public schools.

E. Virtual Schools. Virtual schools are responsible for establishing SBTMTs and conducting threat assessments as required by Rule 6A-1.0019.

SECTION VI: TRANSFER OF RECORDS

A. Upon the student's transfer to a different school, the threat management team of the transferring school will maintain responsibility for the student on an SSMP until responsibility is formally accepted by the receiving school.

B. The transfer of records must occur within 5 school days of receipt of the request for records from the new school or district, or the receipt of the identity of the new school and district of enrollment, whichever occurs first. The records must include, if applicable:
   1. Verified reports of serious or recurrent behavior patterns, including any threat assessment report, all corresponding documentation, and any other information required by the Florida-specific behavioral threat assessment instrument pursuant to s. 1001.212(12) which contains the evaluation, intervention, and management of the threat assessment evaluations and intervention services.
   2. Psychological evaluations, including therapeutic treatment plans and therapy or progress notes created or maintained by school district or charter school staff, as appropriate.

C. Documentation of unfounded level of concerns must not be transferred unless:

1. The parent of the student the subject of an unfounded level of concern finding requests that the records be maintained in the student's file; or
2. The School Based Threat Management Team made the determination that the unfounded level of concern finding must be retained to ensure the continued safety of the school community or to ensure the well-being of the student.

SECTION VII: ADHERENCE TO FLORIDA DEPARTMENT OF EDUCATION OFFICE OF SAFE SCHOOLS' POLICIES AND PROCEDURES

A. The Superintendent, in conjunction with the District Threat Management Coordinator, principals, assistant principals, chairpersons, vice chairpersons, and members of the SBTMT shall implement the Florida Department of Education Office of Safe School's (OSS) Florida Harm Prevention and Threat Management Instrument and Florida Harm Prevention and Threat Management Manual, hereby incorporated by reference, as may be amended by OSS from time to time, consistent with the policies and procedures of OSS.

SECTION VIII: AUDITS

A. The Chief Auditor will conduct annual audits in compliance with this policy as directed by the School Board and report findings to Audit Committee and the School Board.

SECTION IX: Providing Guidance to Students, Faculty, and Staff

A. Students. All students will be oriented within the first ten days school is in session on recognizing concerning behaviors or threats and will be informed to whom concerning behaviors and threats should be reported, pursuant to Section 1006.07(7)(c), F.S. Schools must use the content provided by the District Behavioral Threat Management Department to conduct the orientation.

B. Faculty & Staff. All School Board Employees, including Charter Schools in Broward County, will be oriented through the required Warning Signs training. All school-based staff will complete an additional orientation prior to the first day school is in session on recognizing concerning behaviors or threats and will be informed to whom concerning behaviors and threats should be reported, pursuant to Section 1006.07(7)(c),F.S. Each school will utilize the All-Staff Training For the Masses PowerPoint provided by the Office of Safe Schools (OSS) to orient school-based staff.

Policy Custodian: Office of Safety, Security, and Emergency Preparedness

Authority: 20 U.S.C. §1232g; F.S. §§120. 52(6), 120.54, 120.81(1)(a), 1001.41(1) and (2), 1001.42(28), F.A.C. Rules 6A-1.0018, 6A-1.0019

Laws Implemented:, 34 C.F.R. §99, F.S. §§ 394.463, 1001.212(12), 1002.22, 1002.221, 1003.25, 1006.04 1006.07(7), 1012.584, F.A.C. Rule 6A-1.0955

History: Amended: 10/15/2024
Amended: 6/13/2023
Amended: 5/17/2022
Adopted: 10/20/2020

APPENDIX III

6A-1.0019 Threat Management.

(1) Purpose. The purpose of this rule is to set forth requirements relating to threat management, a process by which school districts, K-12 schools, charter school governing boards, and charter schools identify, assess, manage, and monitor potential and real threats to student safety.

(2) Definitions.

(a) "Florida Harm Prevention and Threat Management Model" or "Florida Model" means the Florida-specific behavioral threat management process required by Section 1001.212(12), F.S. The Florida Model consists of the Florida Threat Management Manual and the Florida Harm Prevention and Threat Management Instrument ("Instrument"). Under the Florida Model, threats and reports of concerning behavior or concerning communications are categorized as unfounded or having a low, medium, or high level of concern.

(b) "School" means a public K-12 school, including a charter school, with a Master School Identification Number (MSID) number as provided under Rule 6A-1.0016, F.A.C., but does not include:

1. Settings where instruction is provided in a county jail or state prison, in a Department of Juvenile Justice facility or program, in a hospital, or while a student is homebound;

2. Schools that provide only prekindergarten or adult education;

3. Technical centers under Section 1004.91, F.S.

"School" also includes the Florida Virtual School (Section 1002.37, F.S.), the Florida School for the Deaf and the Blind (Section 1002.36, F.S.), and Developmental Research (Laboratory) Schools (Section 1002.32, F.S.). These entities also function as "school districts" as defined in paragraph (2)(d) of this rule. A list of schools meeting this definition will be provided to the School Safety Specialists annually by July 1.

(c) "School-based mental health services provider" means a school psychologist certified under Rule 6A-4.0311, F.A.C., a school social worker certified under Rule 6A-4.035, F.A.C., a school counselor certified under Rule 6A-4.0181, F.A.C., or a mental health professional licensed under Chapter 490 or 491, F.S., who is employed or contracted by a district or school to provide mental health services in schools.

(d) "School district" or "district" means a Florida school district, the Florida Virtual School (Section 1002.37, F.S.), the Florida School for the Deaf and the Blind (Section 1002.36, F.S.), Developmental Research (Laboratory) Schools (Section 1002.32, F.S.), and universities or Florida College System institutions that sponsor charter schools (Section 1002.33(5), F.S.).

(e) "Student Support Management Plan" or "SSMP" means an ongoing intervention and monitoring plan implemented by the school-based threat management team. The SSMP may impose requirements on a student of concern for a defined period of time based on the level of concern. The SSMP is reviewed each month by the School Based Threat Management Team (SBTMT).

(f) "Threat Assessment" means the identification of individuals exhibiting threatening or other concerning behavior.

(g) "Threat Management" means the multipart process by which schools identify individuals exhibiting threatening or other concerning behavior, assess the risk of harm, and coordinate appropriate interventions and services for such individuals, as provided in Section 1006.07(7), F.S.

(3) Required policies.

(a) Each school district and charter school governing board must adopt policies, consistent with this rule, for the establishment of threat management teams and for the completion of threat assessments. These policies must include providing guidance by training all students, faculty, and staff regarding recognition of concerning behavior or threats and must identify members of the school community to whom concerning behaviors and threats should be reported, pursuant to Section 1006.07(7)(c), F.S. At a minimum, the policies must address to whom the training will be delivered, the method of delivery, and the frequency the trainings will be required. These policies must also include procedures for referrals to mental health services, pursuant to Section 1012.584(4), F.S., and referrals for threats of self-harm, consistent with Section 394.463, F.S.

(b) Parental notification.

1. School districts and charter school governing boards must, at a minimum, require parental notification in the following circumstances:

a. If the SBTMT Chair determines the report of a concerning behavior or threat is a Low level of concern and summarily closes the case, the Chair or designee must use reasonable efforts to notify the parent or guardian of the student of concern.

b. If the Chair does not summarily close the case and refers it to the SBTMT, reasonable efforts must be made to notify the student of concern's parent or guardian on the same day the SBTMT implements the interim SSMP and assigns the final level of concern.

c. If the final level of concern is High, the SBTMT Chair or designee must notify the superintendent or designee to ensure that the notice requirements of Section 1006.07(7)(e), F.S., are met.

d. Parents or guardians must also be notified if the threat management process reveals information about their student's mental, emotional, or physical health or well-being, or results in a change in related services or monitoring, including but not limited to implementation of an SSMP.

e. Once an SSMP is finalized and anytime it is substantively revised, the SBTMT Chair or designee must provide a copy of the SSMP to the student of concern's parent or guardian. The targeted student's parent or guardian should also be informed that an SSMP has been implemented.

f. Where a report of concern includes an identified student target, the Chair must make a reasonable effort to notify the parent or guardian of the targeted student before the end of the school day that the report was received unless the Chair has determined the concern is unfounded. As provided for in the Florida Harm Prevention and Threat Management Manual (Form OSS-001), the unfounded summary disposition should only be used when it is clear and articulable that there is no basis for concern. If there is any doubt, the case should be forwarded to the full SBTMT for further evaluation and parent notification should occur. Nothing herein prevents the school from notifying parents or guardians if they believe it is in the best interest of the student.

2. "Reasonable effort to notify" means the exercise of reasonable diligence and care to make contact with the student's parent or guardian, typically through the contact information shared by the parent or guardian with the school or school district. The SBTMT Chair or designee must document all attempts to make contact with the parent or guardian.

3. Timelines for required notice may be modified where the SBTMT reasonably believes and documents that such disclosure would result in abuse, abandonment, or neglect, as defined in Section 39.01, F.S.

(c) Education records. Threat assessments and records related to threat management are considered education records as defined by the Family Educational Rights and Privacy Act (FERPA) and Sections 1002.22 and 1002.221, Florida Statutes. Policies relating to access, maintenance, and retention of these records must be consistent with Rule 6A-1.0955, F.A.C., Education Records.

(4) Florida Harm Prevention and Threat Management Model ("Florida Model"). Threat management and assessment of concerning behaviors or communications must be conducted in accordance with the Florida Model, as follows:

(a) District Threat Management Coordinator (DTMC). Each school district superintendent must designate a Primary District Threat Management Coordinator to oversee threat management at all public K-12 schools, including charter schools sponsored by or under contract with the district. Each school district superintendent must also designate a Secondary District Threat Management Coordinator to provide support to the district's threat management process at the discretion of the Primary DTMC. Before a person can be designated as Primary or Secondary DTMC, that person must have already received DTMC training offered by the Office. Where there is no superintendent, the lead administrator for the school district must assign the Threat Management Coordinators.

1. The Primary DTMC must:

a. Ensure that all district-level and school-level threat management team personnel are trained in threat management and on the Florida Model;

b. Serve as Chair of the District Threat Management Team and as the liaison to the Department of Education's Office of Safe Schools ("Office"); and

c. Assist SBTMTs in the district.

2. Each school district school superintendent, or lead administrator if there is no superintendent, must report the name, phone number, and email address of the Primary and Secondary District Threat Management Coordinator to the Office at FloridaModel@fldoe.org. This information must be reported annually by August 1, and must be updated within one (1) school day if there is a change in the information provided.

(b) District Threat Management Team (DTMT). Each school district superintendent must designate a DTMT that will receive referrals from the SBTMTs, assess serious situations, and provide support to school-based teams, including charter schools in their district. The DTMT must include the Primary DTMC as Chair, Secondary DTMC, persons from school district administration and persons with expertise in counseling, instruction, and law enforcement. Where there is no superintendent, the lead administrator for the district must assign the DTMT. Districts with three (3) or fewer schools may request approval to alter the DTMT membership by

emailing the Office at FloridaModel@fldoe.org. The Office will grant requests that demonstrate that the duties of the DTMT can be executed with fidelity.

(c) School Based Threat Management Team (SBTMT). Each school must have an SBTMT comprised of four (4) members ("Core Four"), at a minimum, including persons with expertise in counseling, instruction, school administration, and law enforcement. The principal or equivalent administrative head of the school is responsible for appointing team members. The SBTMT must also include a member with personal knowledge of the student of concern who is the subject of threat management. Team members must meet the following requirements:

1. The counseling team member must be a school-based mental health services provider that is able to access student mental health records. This must not be the school principal, or equivalent.

2. The instructional team member must meet the definition of instructional personnel under Section 1012.01(2)(a)-(d), F.S., or must hold a current Florida Educator Certificate under Section 1012.56, F.S. This must not be the school principal, or equivalent.

3. The school administrator team member must meet the definition of administrative personnel found in Section 1012.01(3), F.S. This must not be the school principal, or equivalent, unless they are the only administrator at the school, because the principal has administrative oversight of the SBTMT. In the event the principal is the only administrator at the school, the Principal must notify the district's DTMC. The DTMC must in turn notify the Office at FloridaModel@fldoe.org.

4. The law enforcement team member must be a sworn law enforcement officer, as defined by Section 943.10(1), F.S., including a School Resource Office, school-safety officer, or other active law enforcement officer. At a minimum, a law enforcement officer serving on a threat management team must have access to local Records Management System information, the Criminal Justice Information System, and the Florida Crime Information Center and National Crime Information Center databases. Officers serving on school-based threat management teams must also have clearance to review Criminal Justice Information and Criminal History Record Information. A school guardian, as defined under Section 1006.12(3), F.S., or a school security guard, as defined under Section 1006.12(4), F.S., may not serve as the law enforcement member of a threat management team. This must not be the school principal, or equivalent.

5. If none of the team members are familiar with the student of concern, the SBTMT Chair must assign a member of the school's staff who is familiar with the student to consult with and provide background information to the threat management team. The person must be instructional or administrative personnel, as defined in Section 1012.01(2) and (3), F.S. Consulting personnel do not have to complete Florida Model training and must not participate in the decision-making process.

(d) Threat Management Chair and Vice Chair. The principal of each school must appoint a Chair and Vice Chair of the SBTMT. The Chair serves as the point person for threat management at the school-level and is responsible for triaging reported threats or concerning behavior and communications to determine whether the matter should be summarily closed or whether it should be reviewed by the full SBTMT.

(e) Instrument. Each SBTMT and DTMT must use the Florida Model to assess the behavior of students who may pose a threat of harm to themselves or others and to coordinate intervention and services for such students. All reported threats or concerning behaviors and communications, even those determined to be unfounded, must be documented by the SBTMT along with any resultant action, using the Florida Model Instrument.

(f) Meetings. At a minimum, the Core Four members of each SBTMT must meet as often as needed to fulfill its duties of assessing and intervening with students whose behavior may pose a threat of harm to themselves or others, but no less than monthly. Documentation of these meetings must be maintained in the Florida Safety and Threat Management Portal (FSTMP), and at a minimum must include meetings dates, team members in attendance, SSMPs discussed with accompanying actions taken, and any other items discussed. If the SBTMT has no active SSMPs to discuss, they must document any other discussion points discussed at their meeting. DTMTs must meet as needed to review and consult with SBTMTs and must meet timeframes set forth in the Florida Threat Management Manual, but no less than monthly to discuss relevant data, strategies and interventions with collaborative stakeholders, provide ongoing support to SBTMTs, and ensure continuous improvement and fidelity in the implementation of the Florida Model.

(g) Training.

1. All members of SBTMTs and DTMTs must be trained on the Florida Model through training provided by or approved by the Office of Safe Schools, as follows:

a. All SBTMT and DTMT members must complete Day One Florida Model training.

b. The DTMC must complete additional training specific to the coordinator role.

c. School principals, the SBTMT Chair, and the SBTMT Vice Chair must complete additional training specific to their respective roles.

d. The district Florida Model Trainers must complete additional training specific to the Trainer role.

2. District and school-level teams must be designated before the start of the school year. Team members who have not previously completed training must complete Florida Model training before the start of the school year. Those appointed to threat management teams after the start of the school year must complete Florida Model training within sixty (60) calendar days of appointment. For assistance in accessing this training, districts must contact the Office in writing at FloridaModel@fldoe.org.

3. District and school-level team members who have been fully trained in a previous school year must complete an annual refresher training provided by the Office within the first sixty (60) calendar days of school. Any district or school-level team member who does not complete the annual refresher within the first sixty (60) calendar days of school must not serve on the SBTMT or DTMT in any capacity until such time as they retake and successfully complete Day One Florida Model Training.

(h) Reporting. Each DTMC must ensure that all threat management teams in the district utilize FSTMP to document and manage all reported threats or concerning behaviors and communications. Each DTMC must report by July 1 each year in the Florida School Safety Assessment Tool that all data in FSTMP accurately reflect the teams' activities during the previous school year.

(5) Florida Safety and Threat Management Portal. Each SBTMT and DTMT must utilize the Florida Model Instrument in the (FSTMP) to document and manage all reported threats or concerning behaviors and communications. FSTMP will be accessible via the Department's Single Sign-On application, available at www.fldoe.org/sso. Access to FSTMP is limited to SBTMTs, DTMTs, and Department employees who need access in order to carry out their official duties.

(6) Charter Schools. Charter schools are responsible for establishing SBTMTs and conducting threat assessments as required by this rule. DTMCs and DTMTs must oversee and support charter schools sponsored by or under contract with the district to the same extent they do for traditional public schools.

(7) Charter Schools Sponsored by a College or University. The Florida College System institution or university board of trustees must establish a DTMT and assign a Primary and Secondary DTMC to oversee and provide support for threat management for all charter schools that fall under the sponsoring entity, in accordance with the Florida Model. Charter schools are responsible for establishing SBTMTs and conducting threat assessments as required by this rule.

(8) Virtual Schools. Virtual schools are responsible for establishing SBTMTs and conducting threat assessments as required by this rule. Florida Virtual School must also establish a DTMT and assign a Primary and Secondary DTMC.

(9) The following form is hereby incorporated by reference and made a part of this rule. Copies may be obtained from the Florida Department of Education, 325 West Gaines Street, Tallahassee, FL 32399-0400. The Threat Management Instrument forms must be completed within FSTMP.

Florida Harm Prevention and Threat Management Manual, Form OSS-001 (http://www.flrules.org/Gateway/reference.asp?No=Ref-19372), effective July 1, 2026.

Rulemaking Authority 1001.02(1), (2)(n), 1001.11(9), 1001.212(12) FS. Law Implemented 1001.11(9), 1001.212(12), 1006.07(7) FS. History–New 9-26-23, Amended 7-2-24, 8-19-25, 5-21-26.

APPENDIX IV

Established 1915
BROWARD County Public Schools

DR. ANGELA R. FULTON
DEPUTY SUPERINTENDENT

PHONE: 754-321-2100 **EMAIL:** afulton@browardschools.com

SIGNATURES ON FILE

June 17, 2026



TO: All School Principals

FROM: Michael G. Gregory
Chief Safety & Security Officer

VIA: Dr. Angela R. Fulton
Deputy Superintendent

SUBJECT: **2026 - 2027 BEHAVIORAL THREAT MANAGEMENT UPDATES**

As we enter the 2026-2027 school year, the Behavioral Threat Management (BTM) Department remains committed to fostering a safe and supportive learning environment for all students and staff.

This guidance is intended to

- Provide school-based and district staff with clear, consistent information for implementing Behavioral Threat Management requirements for the 2026–2027 school year.
- Support compliance with Florida State Rule 6A-1.0019 and School Board Policy 4380.
- Reinforce required training, timely documentation, and consistent threat awareness and reporting practices.
- Promote a coordinated, proactive approach to school safety.

2026-2027 Training Requirements for Threat Management

ACTIONS:

- Per State Rule 6A-1.0019, all School Based Threat Management Team (SBTMT) members, Principals, and District Threat Management Teams (DTMT) must be trained in the Florida Harm Prevention and Threat Management Model (Florida Model) prior to August 10, 2026.

- The principal must ensure the assigned SBTMT Chairs and all Core Team members complete the training required.
- Principals and SBTMT members trained before July 1, 2026, must complete the self-paced online Annual Refresher training by September 4, 2026. Notice will be provided when the state releases the training in mid-July. Link: BTM Florida Model Refresher Training
- Any principal or SBTMT member who did not complete the 2024 or 2025 Refresher Training within the required timeline must retake the 8-hour Florida Model training.
- Monthly All-Chair Meetings will be held on the last Wednesday of each month (except November and December) at 10 a.m.

BTM Mandatory All-Chair Meeting Dates

July 29, 2026	August 26, 2026	September 30, 2026	October 28, 2026
November 18, 2026	December 16, 2026	January 27, 2027	February 24, 2027
March 31, 2027	April 28, 2027	May 26, 2027	

Teams Link: BTM Mandatory All Chair Meeting

GUIDANCE:

- Any SBTMT member newly identified after August 7, 2026, must complete the 8-hour Florida Model training (LAB Course 39133468) within 30 calendar days of their appointment to the team.
- Additionally, the Principal, Chair, and Vice Chair must complete the 6-hour Role-Specific training (Lab Course 39126129) after the Florida Model training.
- Any questions regarding Threat Management training, please email vita.baiamonte@browardschools.com or BTASupport@browardschools.com.

SharePoint Requirements

ACTIONS:

- All SBTMT training certificates must be uploaded to the BTM SharePoint by September 4, 2026.
- All SBTMT training certificates must be stored in the appropriate school folder in SharePoint.

GUIDANCE:

- The Behavioral Threat Management Department maintains a SharePoint site for storing all threat management documents. Link: BTM SharePoint

- Principals, Chairs, and Office Managers have access to their school's digital folder. Contact the BTM Department if you need access to your school's SharePoint folder.

2026-2027 Behavioral Threat Management (BTM) Monthly Meeting Requirements

ACTIONS:

- All schools must conduct BTM Monthly Meetings per Rule 6A-1.0019 and document the meeting in the State Portal.
- The first BTM monthly meeting must be held by August 7, 2026, and all active Student Support Management Plans (SSMPs) must be updated in the State Portal or Focus.
- All remaining meetings must be held by the 20th of each month.
- Review all active SSMPs monthly in the State Portal and upload threat assessment documentation, including logs, referrals, and agendas, to SharePoint.

GUIDANCE:

- Use the Portal's new print feature to print the BTM Monthly Meeting document and obtain wet signatures from all participants on the printed copy.
- Upload the signed BTM Monthly Meeting document to the appropriate monthly SharePoint folder within 2 school days of the meeting.
- Active SSMPs may not be closed before September 1, 2026.

Threat Awareness and Reporting

ACTIONS:

- Schools must provide threat awareness training to staff and students.
- All Staff Training for the 2026-2027 school year must be presented during pre-planning week and completed by August 7, 2026.
- Student Threat Reporting training must be delivered within the first 5 days of school.

GUIDANCE:

- All Documentation must be uploaded to SharePoint.
- For the All Staff training, upload a sign-in sheet with the date of the training into the BTM SharePoint Folder by August 11, 2026.
- For the Student Threat Reporting training, upload lesson plan, agenda, or PowerPoint with the date of the training into the BTM SharePoint Folder by August 18, 2026.

Statewide Threat Management Portal Requirements

ACTIONS:

- All threats must be documented in the Statewide Threat Management Portal.

GUIDANCE:

- Access to the State Portal requires completion of all required training and is limited to trained principal, SBTMT, and District Threat Management Team members.

If you have any questions, please contact the Behavioral Threat Management Department at 754-321-3550 or email BTASupport@browardschools.com. Thank you for all you do to ensure the safety of students and staff.

ARF/MG/KPE:tf

c: BCPS Cabinet
Regional Directors