



**PENNSYLVANIA COMMISSION ON CRIME AND DELINQUENCY  
SCHOOL SAFETY AND SECURITY COMMITTEE**

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**Model K-12 Threat Assessment Procedures and Guidelines**

*Issued*  
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## DEFINITIONS AND KEY TERMS

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1. **Alternative Education for Disruptive Youth (AEDY):**<sup>1</sup> Programs implemented by a school district, area career and technical school, a group of school districts, or an Intermediate Unit which removes disruptive students from regular school programs in order to provide those students with a sound educational course of study and counseling designed to modify disruptive behavior and return students to a regular school curriculum.
2. **Behavioral Service Providers:**<sup>2</sup> 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.
3. **Behavior Support:**<sup>3</sup> The development, change, and maintenance of selected behaviors through the systematic application of behavior change techniques.
4. **Bullying:**<sup>4</sup> An intentional electronic, written, verbal or physical act, or a series of acts directed at another student or students, which occurs in a school setting that is severe, persistent or pervasive, and that has the effect of doing any of the following: 1) substantially interfering with a student's education; 2) creating a threatening environment; or 3) substantially disrupting the orderly operation of the school.
5. **Chief School Administrator:**<sup>5</sup> A superintendent of a school district, executive director of an Intermediate Unit (IU), administrative director of an area career and technical school, or chief executive officer of a charter school, regional charter school, or cyber charter school.
6. **Culturally Responsive:**<sup>6</sup> The valuation, consideration, and integration of individuals' culture, language, heritage, and experiences leading to supported learning and development.
7. **Individualized Education Program (IEP):**<sup>7</sup> An IEP is a written plan for the provision of services for the education of students with disabilities or gifted students. Under federal and state law, public school entities in Pennsylvania have a responsibility for children "thought-to-be" eligible for special education services and/or accommodations, including locating, identifying, and evaluating all students with suspected disabilities, including but not limited to evaluating a student for who a request for an evaluation has been made. Two criteria exist for an IEP, both of which must be met:
  - a. The student must meet one of the 13 disability categories defined by the [Individuals with Disabilities Education Act \(IDEA\)](#); and

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<sup>1</sup> PA Public School Code of 1949, [Article XIX-C](#). Disruptive Student Programs; [Article XIX-E](#). Private Alternative Education Institutions for Disruptive Students.

<sup>2</sup> PA Public School Code, [Article XIII-E](#) (Threat Assessment).

<sup>3</sup> 22 Pa. Code § 14.133. Positive behavior support.

<sup>4</sup> 24 PS § 1303.1-A. Policy relating to bullying.

<sup>5</sup> PA Public School Code, [Article XIII-E](#) (Threat Assessment).

<sup>6</sup> [Culturally Responsive Systems](#), Pennsylvania Training and Technical Assistance Network (PaTTAN)

<sup>7</sup> [IEPs and 504 Service Agreements](#), Pennsylvania Department of Education.

- b. The student must need special education (that is, the child requires specially designed instruction to receive educational benefits).
8. **Individualized Management Plan:**<sup>8</sup> A plan developed for each student that is referred to a Threat Assessment Team that documents the concerns that brought a student to the Team's attention, as well as the unique resources and supports a student might need based on the information gathered during the assessment. A management plan should remain in place until the Team is no longer concerned about the student or the risk for violence.
9. **Law Enforcement Agency:**<sup>9</sup> A police department of a city, borough, incorporated town or township, the Pennsylvania State Police, district attorneys' offices, and the Office of Attorney General.
10. **Multi-Tiered Systems of Support (MTSS):**<sup>10</sup> A standards-aligned, comprehensive school improvement framework for enhancing academic, behavioral and social-emotional outcomes for all students. As part of the MTSS framework, cross-disciplinary teams represented at the local education agency (LEA), school, grade and individual levels use a problem-solving process to integrate evidence-based academic, behavioral, and social-emotional practices matched to student needs and with fidelity of implementation. A continuum of supports and services exist across three tiers (Universal, Secondary, and Tertiary), and is undergirded by high-quality professional learning, cultural responsiveness, partnership and meaningful involvement with families, and dynamic decision-making that rests on the use of reliable and valid data sources.
  - a. Tier 1 (Universal): Provide preventive, proactive, and universal interventions to support academic instruction for all students.
  - b. Tier 2 (Secondary): Provide targeted interventions to support students classified as academically "at risk," who require more intervention than is typically provided within Tier 1 (Universal) supports.
  - c. Tier 3 (Tertiary): Requires the most intensive level of intervention for students with the most significant, high intensity academic support needs (assessment based).
11. **Pennsylvania School Climate Survey:** The PDE Office for Safe Schools developed [free, online school climate surveys](#) for use by school entities in Pennsylvania. These surveys provide schools with formative and summative climate data for use with needs assessments, program development, and short and long-term planning. The domains measured by the surveys include: Social Emotional Learning, Student Support, and Safe and Respectful School Climate.
12. **Pennsylvania Youth Survey (PAYS):**<sup>11</sup> A biennial survey of Pennsylvania school students in the 6<sup>th</sup>, 8<sup>th</sup>, 10<sup>th</sup> and 12<sup>th</sup> grades to learn about their behavior, attitudes, and knowledge concerning alcohol, tobacco, other drugs, and violence. Since 1989, PCCD has sponsored and conducted the

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<sup>8</sup> [Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence](#), National Threat Assessment Center, 2018.

<sup>9</sup> PA Public School Code, [Article XIII-D](#) (Safe2Say Program). Section 1302-D. Definitions. NOTE: For purposes of student education records handling and confidentiality, the Family Educational Rights and Privacy Act (FERPA) has a different definition for "law enforcement unit" which could include a school police officer employed or contracted by the school entity, or an outside law enforcement agency. (34 CFR Sec. 99.8)

<sup>10</sup> [Multi-Tiered Systems of Support \(Academic\)](#), Pennsylvania Technical Assistance and Training Network.

<sup>11</sup> [Pennsylvania Youth Survey \(PAYS\)](#), Pennsylvania Commission on Crime and Delinquency.

PAYS to assess use/misuse of harmful substances and behaviors as well as risk factors related to these behaviors and the protective factors that help guard against them.

13. **Positive Behavior Interventions and Support (PBIS):**<sup>12</sup> A proactive, multi-tiered approach to discipline that promotes appropriate student behavior and increased learning. PBIS provides direction and a decision-making framework for developing a comprehensive system of behavior support tailored to individual program and school needs and is based on a three-tiered model.
  - a. Tier 1 (Universal): Provides a system of supports to all students in a school based on preventative practices which emphasize teaching and reinforcing expected student behaviors.
  - b. Tier 2 (Secondary): Provides targeted interventions to support students classified as “at risk,” who require more intervention than is typically provided within Tier 1 (Universal) supports.
  - c. Tier 3 (Tertiary): Requires the most intensive level of intervention for students with the most significant behavioral/emotional support needs (assessment based).
  
14. **Positive Behavior Support Plans:**<sup>13</sup> A plan for students with disabilities and eligible young children who require specific intervention to address behavior that interferes with learning. A positive behavior support plan shall be developed by the IEP team, be based on a functional behavior assessment, and become part of the individual eligible young child’s or student’s IEP. These plans must include methods that utilize positive reinforcement and other positive techniques to shape a student’s or eligible young child’s behavior, ranging from the use of positive verbal statements as a reward for good behavior to specific tangible rewards.
  
15. **Professional Development:**<sup>14</sup> Activities that:
  - a. Are an integral part of school and local educational agency strategies for providing educators (including teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, and, as applicable, early childhood educators) with the knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet the challenging State academic standards; and
  - b. Are sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused.
  
16. **Protective Factors:**<sup>15</sup> Characteristics at the biological, psychological, family, or community (including peers and culture) level that are associated with a lower likelihood of problem outcomes or that reduce the negative impact of a risk factor on problem outcomes.
  
17. **Safe2Say Something Program:**<sup>16</sup> Established by Act 44 of 2018, the *Safe2Say Something* Program teaches students, educators, and administrators how (1) to recognize the signs and signals of individuals who may be at risk of hurting themselves or others, and (2) to anonymously report this information through the *Safe2Say Something* app, website, or 24/7

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<sup>12</sup> [Overview of Positive Behavior Interventions and Supports \(PBIS\)](#), Pennsylvania Technical Assistance and Training Network.

<sup>13</sup> 22 Pa. Code § 14.133. Positive behavior support.

<sup>14</sup> ESEA Section 8101(42).

<sup>15</sup> [Risk & Protective Factors](#), Youth.gov.

<sup>16</sup> *Safe2Say Something Guidelines*, Pennsylvania Office of the Attorney General, October 2019.

Crisis Center Hotline. The program is managed by the Pennsylvania Office of the Attorney General, in partnership with the nonprofit organization Sandy Hook Promise.

18. **Safety Planning:**<sup>17</sup> Safety planning can occur within a range of contexts, including suicide prevention and intimate partner violence, but are generally used to anticipate and prevent risks to an individual's well-being, including identifying strategies for internal and external supports and interventions when preventive measures do not avert a crisis. Safety planning identifies specific actions that will occur in these cases, and is developed using input from relevant stakeholders, such as families, school personnel, and community-based providers.
19. **School Entity:**<sup>18</sup> A school district, Intermediate Unit (IU), area career and technical school, charter school, regional charter school, or cyber charter school.
20. **School Police Officer:**<sup>19</sup> Any of the following:
  - a. A law enforcement officer employed by a school entity whose responsibilities, including work hours, are established by the school entity.
  - b. An independent contractor or an individual provided through a third-party vendor who has been appointed by a judge of the court of common pleas of the county within which the school entity is situated, pursuant to Section 1302-C of the PA Public School Code.
21. **School Resource Officer:**<sup>20</sup> A law enforcement officer commissioned and employed by a law enforcement agency whose duty station is located in a school entity and whose stationing is established by an agreement between the law enforcement agency and the school entity. The term includes an active certified sheriff or deputy sheriff whose stationing in the school entity is established by a written agreement between the county, the sheriff's office, and the school entity.
22. **Section 504 Plan/Service Agreement:**<sup>21</sup> A Section 504 Plan describes the regular or special education and related aids and services a student needs and the appropriate setting in which to receive those services to meet requirements for students with disabilities under Section 504 of the Rehabilitation Act of 1973. Plans/agreements can include setting forth the specific related aids, services, or accommodations needed by the student, which are implemented in school, in transit to and from school, and in all programs and procedures, so that the student has equal access to the benefits of the school's educational programs, nonacademic services, and extracurricular activities.
23. **Student Assistance Program (SAP):** Established under [Section 1547 of PA Public School Code](#), SAP is designed to assist school personnel in identifying issues including alcohol, tobacco, other drugs, and mental health issues which pose a barrier to a student's success. Pennsylvania requires all school entities (school districts, charter schools, and cyber charter schools) to have SAP programs for all grades (elementary and secondary). The [PA Network for Student Assistance](#)

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<sup>17</sup> Adapted from *Core Element: Risk Assessment and Safety Planning*, Child Behavioral Health Knowledge Center, Massachusetts Department of Mental Health.

<sup>18</sup> PA Public School Code, [Article XIII-E](#). Threat Assessment.

<sup>19</sup> PA Public School Code, [Article XIII-C](#). School Security.

<sup>20</sup> PA Public School Code, [Article XIII-C](#). School Security.

<sup>21</sup> 42 U.S.C. § 12102 – ADA, 22 Pa. Code § 15.2, 15.7. See also: [Parent and Educator Resource Guide to Section 504 in Public Elementary and Secondary Schools](#), U.S. Department of Education, Office for Civil Rights, December 2016.



[Services \(PNSAS\)](#) Regional Coordinators are available to provide technical assistance to support schools in meeting required criteria.

24. **Suicide Risk Assessment:**<sup>22</sup> A suicide risk assessment is used to identify the presence of suicidal ideation, intent, and plans and determine if a student is at risk for doing something to end their life in the near future.
25. **Suicide Risk Monitoring:**<sup>23</sup> Students who have previously been assessed and found to have any level of suicide risk need to be monitored regularly for changes in suicide risk. As suicidal ideation is episodic; it weakens and intensifies, regular monitoring will increase the likelihood that variations in the student's suicide risk are being identified and addressed.
26. **Suicide Screening:**<sup>24</sup> Suicide risk screenings are used to identify students who need more in-depth assessments to determine whether they are suicidal, and if so, at what level of severity.
27. **Threat:**<sup>25</sup> Communication or behavior that indicates an individual poses a danger to the safety of school staff or students through acts of violence or other behavior that would cause harm to self or others. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means. These actions can be considered a threat regardless of whether it is observed by or communicated directly to the target of the threat or observed by a third party, and regardless of whether the target of the threat is aware of the threat.
  - a. **Low Risk Threat:** The individual/situation does not appear to pose a threat of violence or serious harm to self/others, and any exhibited issues/concerns can be easily resolved.
  - b. **Moderate Risk Threat:** The individual/situation does not appear to pose a threat of violence or serious harm to self/others at this time, but exhibits behaviors that indicate a continuing intent and potential for future violence or serious harm to self/others; and/or exhibits other concerning behavior that requires intervention.
  - c. **High Risk Threat:** The individual/situation appears to pose a threat of violence, exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the plan; any may also exhibit other concerning behavior that requires intervention.
  - d. **Imminent Threat:** An individual/situation appears to pose a clear and immediate threat of serious violence toward others that requires containment and action to protect identified or identifiable target(s); and may also exhibit other concerning behavior that requires intervention.
  - e. **Direct Threat:** An individual/situation poses a significant risk to the health or safety of themselves and/or others that cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of auxiliary aids or services. The direct threat standard applies when the Threat Assessment Team or school entity administration determines that an individual/situation poses a direct threat and that applicable disciplinary procedures are not available or sufficient to mitigate the threat.

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<sup>22</sup> Erbacher, T.A., Singer, J.B., & Poland, S. (2015). Suicide in schools: A practitioner's guide to multi-level prevention, assessment, intervention and postvention.

<sup>23</sup> Erbacher, T.A., Singer, J.B., & Poland, S. (2015). Suicide in schools: A practitioner's guide to multi-level prevention, assessment, intervention and postvention.

<sup>24</sup> Erbacher, T.A., Singer, J.B., & Poland, S. (2015). Suicide in schools: A practitioner's guide to multi-level prevention, assessment, intervention and postvention.

<sup>25</sup> [Virginia Guidelines](#)

28. **Threat Assessment:**<sup>26</sup> 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.
29. **Threat Assessment Team:**<sup>27</sup> A multidisciplinary group of individuals identified by a chief school administrator responsible for the assessment of and intervention with students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community, or others.
30. **Trauma:**<sup>28</sup> Includes results from an event, series of events or set of circumstances that is experienced by an individual as physically or emotionally harmful or threatening and that has lasting adverse effects on the individual's cognitive functioning and physical, social, emotional, mental or spiritual well-being.
31. **Trauma-Informed Approach:**<sup>29</sup> Includes a school-wide approach to education and a classroom-based approach to student learning that recognizes the signs and symptoms of trauma and responds by fully integrating knowledge about trauma into policies, professional learning, procedures and practices for the purposes of recognizing the presence and onset of trauma, resisting the reoccurrence of trauma and promoting resiliency tailored to a school entity's culture, climate and demographics and the community as a whole.
32. **Youth Risk Behavior Surveillance System (YRBSS):**<sup>30</sup> Developed in 1990 by the CDC to monitor health behaviors that contribute markedly to the leading causes of death, disability, and social problems among youth and adults in the United States, the YRBSS includes national, state, territorial, tribal government, and local school-based surveys of representative samples of 9<sup>th</sup> through 12<sup>th</sup> grade students. Surveys are administered every two years, conducted by relevant departments of health and education.

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<sup>26</sup> PA Public School Code, [Article XIII-E](#). Threat Assessment.

<sup>27</sup> PA Public School Code, [Article XIII-E](#), Section 1302-E.

<sup>28</sup> [PA Public School Code of 1949, Section 102 \(Definitions\)](#).

<sup>29</sup> [PA Public School Code of 1949, Section 102 \(Definitions\)](#).

<sup>30</sup> [Youth Risk Behavior Surveillance System \(YRBSS\)](#), Centers for Disease Control and Prevention.

## INTRODUCTION

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### What is Threat Assessment?

For nearly two decades, federal law enforcement and education agencies have recommended the use of multidisciplinary threat assessment in schools as a strategy to prevent targeted violence and other safety concerns.<sup>31</sup> Threat assessment was initially developed by the U.S. Secret Service to identify potential threats to public officials, and has since evolved into a scientific, systematic approach to analyzing and mitigating dangerous situations (“targeted violence”) in settings that range from workplaces to campuses to K-12 schools.<sup>32</sup>

**Figure 1. What is Threat Assessment? What is it Not?<sup>33</sup>**

<b>Threat Assessment IS:</b>	<b>Threat Assessment IS NOT:</b>
A fact-based, investigative approach to determining how likely a person is to carry out a threat of violence. (Safe School Initiative Study, 2002)	A simple checklist of warning signs or red flags used to remove a student from school.
A means to identify, assess, and manage individuals who are at risk for violence against themselves or others.	A means to label a student as a troublemaker and enact consequences.
A way to identify someone who has the potential for violence in many forms – self-harm, assault, risk-taking behaviors, suicide, substance abuse, and other aggressive or dangerous behaviors.	A means to find “the next school shooter.”
Focused on a given individual(s) as a potential threat, conducted as the need arises (i.e., examines people, not things).	A vulnerability assessment, site survey, or security audit, which focuses on the facility, policies, and procedures, not individuals (i.e., examines things, not people).

While still statistically rare, the number of incidents of targeted violence in K-12 schools has increased in recent years. Research and analysis of these incidents show there is no profile of a student attacker, nor is there a profile for the type of school impacted by targeted violence.<sup>34</sup> As such, a threat assessment process is not designed to develop a profile focused on a set of traits or characteristics but to evaluate, on a case-by-case basis, whether situations, actions, and behaviors could result in a significant risk to the health and safety of individuals within a school community. In addition to an individualized assessment, these determinations must be made based on reasonable judgment relying on the best available objective evidence to determine the nature, duration, and severity of the risk; the probability that potential injury will actually occur; and whether reasonable modifications of policies, practices, or

<sup>31</sup> Dewey G. Cornell, [Overview of the Virginia Student Threat Assessment Guidelines \(VSTAG\)](#), University of Virginia, June 18, 2018.

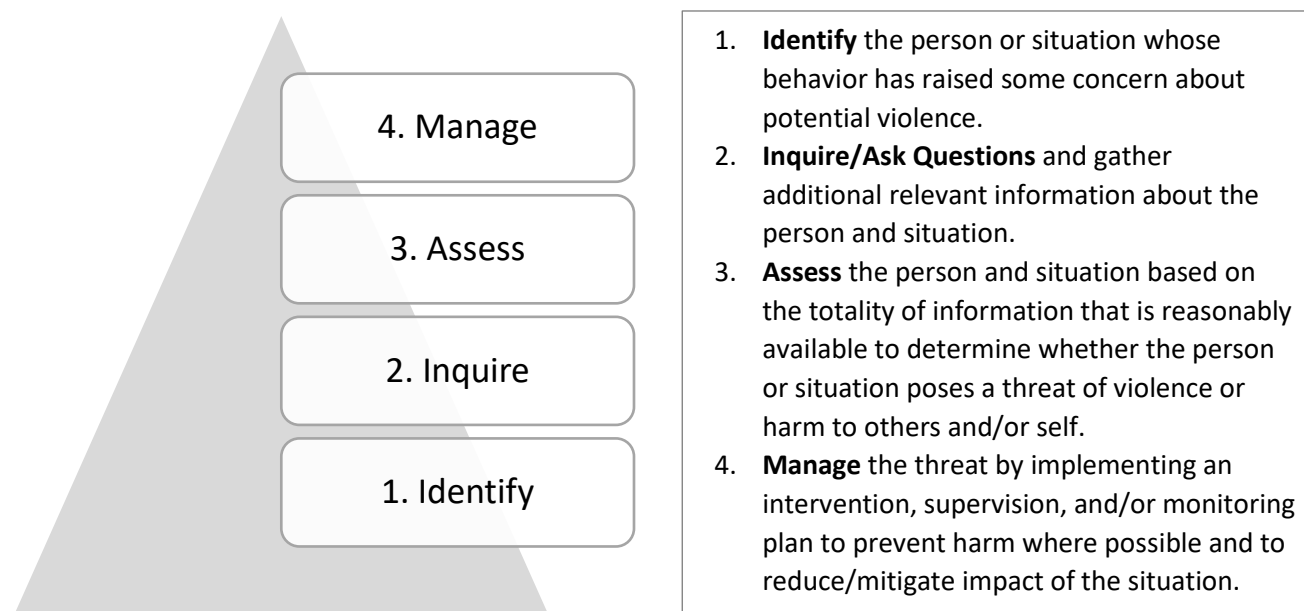
<sup>32</sup> Ibid.

<sup>33</sup> Adapted from [Behavioral Threat Assessment and Management for Educators and Administrators](#), Behavioral Threat Assessment and Management for Educators and Administrators, Texas School Safety Center., <https://txssc.txstate.edu/tools/tam-toolkit/defining-tam>.

<sup>34</sup> [Protecting America’s Schools: A U.S. Secret Service Analysis of Targeted School Violence](#), U.S. Department of Homeland Security and U.S. Secret Service, National Threat Assessment Center, 2019.

procedures could mitigate that risk.<sup>35</sup> It is important to note that the focus of a threat assessment process is to understand the situation and how best to mitigate safety concerns, and is not the same as a criminal or disciplinary investigative process.<sup>36</sup>

**Figure 2. Threat Assessment Process<sup>37</sup>**



Research suggests that, as part of broader efforts to build a positive school climate that promotes student engagement and supports student needs,<sup>38</sup> establishing or enhancing threat assessment capabilities as part of a comprehensive violence prevention strategy can reduce the likelihood of violence and can help address the mental and behavioral health needs of students.<sup>39</sup> The *2018 Pennsylvania School Safety Task Force Report* also highlighted the need to increase access to mental health services for students, build connections to the community, as well as increase information sharing among schools, law enforcement agencies, and social services.<sup>40</sup>

<sup>35</sup> *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines, Second Edition*, Virginia Department of Criminal Justice Services, August 2016, [Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines, Second Edition](https://www.dcj.virginia.gov/sites/dcj.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf)

<https://www.dcj.virginia.gov/sites/dcj.virginia.gov/files/publications/law-enforcement/threat-assessment-model-policies-procedures-and-guidelinespdf.pdf>, Virginia Department of Criminal Justice Services, August 2016. .

<sup>36</sup> *Behavioral Threat Assessment and Management for Educators and Administrators*, Texas School Safety Center, [Behavioral Threat Assessment and Management for Educators and Administrators](https://txssc.txstate.edu/tools/tam-toolkit/defining-tam)

<https://txssc.txstate.edu/tools/tam-toolkit/defining-tam>, Texas School Safety Center..  
<sup>37</sup> Adapted from *Behavioral Threat Assessment and Management for Educators and Administrators*, Behavioral Threat Assessment and Management for Educators and Administrators, Texas School Safety Center., <https://txssc.txstate.edu/tools/tam-toolkit/defining-tam>.

<sup>38</sup> Deborah Temkin, Ph.D., “[Examining State and Federal Recommendations for Enhancing School Safety Against Targeted Violence](#),” Testimony, U.S. Senate Committee on Homeland Security and Governmental Affairs, July 25, 2019.

<sup>39</sup> *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*, National Threat Assessment Center, July 2018.

<sup>40</sup> *Pennsylvania School Safety Task Force Report*, August 2018.

Multidisciplinary threat assessment efforts in schools should work in tandem with other efforts to bolster student safety and well-being. These include programs like the Student Assistance Program (SAP), Positive Behavior Interventions and Support (PBIS), Multi-Tiered Systems of Support (MTSS), trauma-informed practices, and social-emotional learning programs, as well as emergency management and physical security initiatives, including the *Safe2Say Something* Program.

Importantly, threat assessment is not designed to replace other school-based frameworks that identify students who may require additional interventions and supports, and should work to complement those systems, not compete with them. As described in the “Before You Get Started” section on page 19, threat assessment does not excuse school entities from compliance with other federal and state laws, including those designed to ensure confidentiality of student records as well as appropriate levels of support and protections for eligible students, such as those with Individualized Education Programs (IEPs). Conversely, these obligations do not inherently prohibit school entities from engaging in a threat assessment process where evidence suggests a reasonable concern for an immediate and/or significant risk to health or safety of the student, other students, or the broader school community.

### **Current Landscape of School Safety in Pennsylvania**

Recent data collected and reported in Pennsylvania suggest a growing need for multidisciplinary threat assessment and specialized mental/behavioral health intervention teams in K-12 schools. Over the past several years, Pennsylvania’s students have increasingly reported experiencing peer harassment and violence, while school administrators across the state have expressed concern about the growing physical, mental, social, and emotional needs of students.

The *2017-2018 Safe Schools’ Annual Report* from the Pennsylvania Department of Education (PDE) Office for Safe Schools shows that reported incidents such as assault, fighting, and weapons possession have increased since 2015.<sup>41</sup> In 2017-18, Pennsylvania public schools reported 75,722 incidents of violence, bullying, and harassment, including 2,819 incidents involving weapons on school grounds.<sup>42</sup>

A recent statewide survey of school districts also found that 42.5% of superintendents and 31.1% of building principals identified school safety and security as their top challenge.<sup>43</sup> An overwhelming majority of superintendents (78.9%) identified meeting the mental health needs of students as their biggest safety and security challenge, followed by insufficient resources to meet students’ needs (38.8%), rumors/threats on social media platforms (29.3%), identifying at-risk students (14.2%), and physical security (12.9%).<sup>44</sup>

Other concerning trends have emerged in biennial surveys of Pennsylvania students enrolled in grades 6-12.<sup>45</sup> The *2017 Pennsylvania Youth Survey (PAYS)* shows increased rates of youth reporting experiencing threats of or actual violence. One in five students (20.5%) reported being threatened with violent behavior on school property (vs. 18.8% in 2013), 8.3% reported actually being attacked (vs. 7.0% in 2013), and 1.2% of students reported bringing a weapon to school at least once. When asked about mental health concerns, 38.1% of Pennsylvania students reported feeling sad or depressed most days – up from 31.7% in 2013. Rates of self-harm, including suicidal ideation and attempted suicide, have also increased in recent years. In 2017, 16.5% of students surveyed reported they had seriously considered

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<sup>41</sup> [Safe Schools Online](#), PDE Office for Safe Schools.

<sup>42</sup> [Safe Schools Online](#), PDE Office for Safe Schools.

<sup>43</sup> 2019 State of Education Report, PA School Boards Association (PSBA), March 2019.

<sup>44</sup> 2019 State of Education Report, PSBA.

<sup>45</sup> [2017 Pennsylvania Youth Survey \(PAYS\)](#), PCCD.

attempting suicide (vs. 15.6% in 2013); 10% said they had attempted suicide at least once in the past year, up from 7.6% in 2013.

While not a requirement until 2019, many school entities in Pennsylvania have established Threat Assessment Teams to receive and evaluate reports of concerning behavior from students and other school community members. Beyond those focused on threat assessment protocols, school entities have also implemented other multidisciplinary school-based intervention teams, such as those utilized in the MTSS and PBIS frameworks. Pennsylvania schools are also required to have SAP teams in place to address concerning behavior that creates barriers for students' academic achievement and school success. These frameworks and programs, along with the services, protections, and rights guaranteed through a myriad of both federal and state civil rights laws, provide a foundation for addressing a number of systemic and individual barriers.

Finally, the procedures and guidelines described within this document were developed to work in coordination with a variety of school-based and community-based supports, including mental and behavioral health services, counseling, social workers, and psychologists. In that vein, the threat assessment process often involve referrals for interventions, supports, and services from these professionals to aid students.

Although these services and supports are critical for meeting student's social, emotional, and mental health needs, there are significant variations in the availability of school-based health and support personnel across Pennsylvania. According to data from PDE, in the 2018-2019 school year:<sup>46</sup>

- The average student-to-school counselor ratio in Pennsylvania's K-12 schools is 328 to 1 – significantly higher than the ratio of 250 to 1 recommended by the American School Counselor Association.
- While every school district in Pennsylvania is required to utilize a school psychologist, many school districts (113, or 23 percent) do not have one on staff. These school districts serve 162,393 students across the Commonwealth.
- Only 96 school districts – less than a fifth – reported employing a school social worker in 2018-2019, with an average student-to-school social worker ratio of 1,015 to 1. (The School Social Work Association of America recommends a ratio of 250 to 1.) More than two-thirds of Pennsylvania's K-12 students (1,066,803) are enrolled in school districts that do not have a school social worker on staff.

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<sup>46</sup> [Professional and Support Personnel](#), PA Department of Education, accessed November 1, 2019.

## **Key Considerations for Threat Assessment Teams<sup>47</sup>**

Threat assessment is a systematic process designed to:

- Identify individual(s)/situation(s) where behavior causes concern for violence and capacity to carry out a threat, (i.e., determine whether a student poses a threat for harm or violence to themselves or others, not just whether the student has made a threat);<sup>48</sup>
- Gather the most relevant information about the student’s communications and behaviors, negative or stressful events the student has experienced, and resources the student possesses to overcome those setbacks and challenges;
- Collect and share this relevant information in a lawful and ethical manner, including complying with relevant federal and state privacy laws;
- Assess the individual(s)/situation(s) in context based on the totality of information available; and
- Identify strategies to prevent violence and mitigate impact of harm to the student, school, and/or community.

Effective threat assessment procedures rely on forming a multidisciplinary Threat Assessment Team; establishing central reporting mechanisms; clearly defining the threshold for law enforcement intervention; providing training and information to key stakeholders; and promoting safe and positive school climates.

In addition, school entities must take steps before Threat Assessment Teams are in place to ensure readiness. In particular, school entities should provide information and training to school community members regarding threat assessment procedures, including the names/contact information of designated Threat Assessment Team members. Training, information, and community engagement practices should encourage reporting of concerns while making clear that the threat assessment process is designed to evaluate potential situations in which significant and/or imminent threat is likely to occur (i.e., it is not designed to replace other programs/initiatives within the school that help connect students and families with necessary supports or services).

Finally, while the threat assessment process provides a foundation, the specific needs and contexts of each individual case that comes to a team’s attention, coupled with the specific environment of each school/community, makes the development and ongoing work of each Threat Assessment Team inherently unique.

## **New K-12 Threat Assessment Requirements in Pennsylvania**

These *Model K-12 Threat Assessment Procedures and Guidelines* were developed in response to new requirements enacted by the Pennsylvania General Assembly in June 2019. Among its provisions, **Act 18 of 2019** established new requirements for K-12 school entities related to threat assessment under [Article XIII-E of the PA Public School Code](#), as well as responsibilities for PCCD’s School Safety and Security Committee (SSSC) to support implementation.

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<sup>47</sup> Adapted from [Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines, Second Edition](#), Virginia Department of Criminal Justice Services, August 2016; and *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*, National Threat Assessment Center, July 2018.

<sup>48</sup> M. Louvar Reeves and S.E. Brock, “School Behavioral Threat Assessment and Management,” *Contemporary School Psychology*, October 2017.

With this new law, Pennsylvania joins several other states in requiring the formation of Threat Assessment Teams.<sup>49</sup> In developing these model guidelines and procedures, as well as resources related to training and information materials, PCCD looked to these other states to inform Pennsylvania’s approach to implementation.

Because of the Commonwealth’s unique landscape as well as the multidisciplinary nature of the threat assessment process, PCCD also consulted with dozens of researchers, practitioners, policymakers, and partners representing education, mental and behavioral health, law enforcement, juvenile justice, emergency management, and community organizations as it undertook this work.

### **Requirements for School Entities Established in Article XIII-E**

Article XIII-E of the PA Public School Code states that **Threat Assessment Teams are responsible for “the assessment of and intervention with students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others.”**<sup>50</sup> Under the new law, all school entities in Pennsylvania must establish at least one Threat Assessment Team by the beginning of the 2021-2022 school year.

“School entities” include school districts, Intermediate Units (IUs), career and technical centers (CTCs), charter schools, regional charter schools, and cyber charter schools. School entities may satisfy these requirements by assigning threat assessment responsibilities to an existing team, including Student Assistance Program (SAP) teams, Crisis Response Teams, or *Safe2Say Something* Teams. A Threat Assessment Team may also serve one or more schools within the school entity.

### **School Threat Assessment Teams: Access to Information**

Article XIII-E of the PA Public School Code explicitly provides Threat Assessment Teams with access to the following student information, to the extent necessary for fulfilling their duties and allowed by federal law:

- Student health records;
- Prior school disciplinary records;
- Records or information shared with the school entity related to adjudication;
- Records of any prior behavioral or mental health or psychological evaluations or screenings maintained by the school entity; and/or
- Other records or information that may be relevant to evaluating a threat or determining treatment/referral options for a student that are maintained by the school entity.

Several laws address privacy of student information, including the Family Educational Rights and Privacy Act (FERPA), which restricts disclosure of information from student education records, as well as the Individuals With Disabilities Education Act (IDEA), which protects certain special education information of students with disabilities.<sup>51</sup> State laws in Pennsylvania and adopted board-level policies also provide privacy protections for students. Please see the “Tools and Resources: Confidentiality, Privacy & Consent Laws” summary box below for additional information.

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<sup>49</sup> As of October 2019, eight states require threat assessment teams in K-12 schools: Florida, Kentucky, Maryland, Rhode Island, Tennessee, Texas, Virginia, and Washington. Six states, including Pennsylvania, enacted these requirements in 2019.

<sup>50</sup> [Section 1302-E, Article XIII-E, PA Public School Code.](#)

<sup>51</sup> FERPA 20 U.S.C. 1232g and 34 CFR Part 99; IDEA 20 U.S.C. 1400 et seq. and 34 CFR Part 300; School Code 24 P.S. 1306-A, 1402, 1409; 22 PA Code Chapter 12, 15.9, 16.65



Student records and information must be handled, created and accessed only to fulfill responsibilities for completing the threat assessment process, and in accordance with applicable law, regulations, board policy and the school entity's Student Records Plan. The rights and privacy of students and their families should be respected at all times.

The confidentiality and handling requirements for student information should be based on an analysis of:

- Who created the record or information (i.e., school administrator, nurse, law enforcement agency, juvenile court, outside behavioral health provider)?
- Where is the record or information stored (i.e., in the guidance office, in a psychologist's files, in an outside clinic)?
- What is the purpose of the record or information - why was it created?
- Who has access to the record or information?

Laws and regulations related to confidentiality of student information address exceptions for disclosing certain information in emergencies to protect the health and safety of students and others. School entities, law enforcement agencies, behavioral health providers and other organizations that may be involved in the threat assessment process should follow the requirements applicable to their creation and handling of confidential records and should seek the advice of legal counsel for guidance.

**NOTE:** School entities may use data collected through its Threat Assessment Team activities, and may release such data in the aggregate, in order to help the school entity develop a general approach to threat assessment, as set out in 1302-E(a)(2)(v). The school entity's release of aggregate data collected through its Threat Assessment Team activities is permissible only where the release of such aggregate data may not result in the breach of federal and state confidentiality laws.



#### **TOOLS AND RESOURCES: Confidentiality, Privacy & Consent Laws**

For a comprehensive listing of available resources and information related to confidentiality, privacy, and consent laws, among other topics, please see **Appendix D (Additional Resources for School Entities)** on page 50.

### **Exclusion of Certain Records from the Pennsylvania Right-to-Know Law**

Pennsylvania has enacted statutory exceptions for the Commonwealth's Right-to-Know Law (RTKL) because of the sensitivity of information used in the threat assessment process as well as other safety-related activities, such as school safety assessments/audits. Records that are now exempt from RTKL (or are still subject to RTKL) are:

- School security plans
- School safety and security survey responses to PCCD
- Records developed by Threat Assessment Teams
- School safety and security report provided annually to the school entity's board of directors

Section 708(b)(16) of Pennsylvania's RTKL also provides for exemptions which commonly apply to law enforcement records, such as those relating to or resulting in a criminal investigation.<sup>52</sup>

<sup>52</sup> [RTKL Guide for Law Enforcement Agencies](#), Pennsylvania Office of Open Records, September 4, 2018.

School entities should work with their school solicitor or other legal counsel in responding to Right-to-Know requests concerning school safety and security and the threat assessment process. Remember, although some records may be exempt from access, actions taken by the board at a public meeting in regard to information will always be accessible to the public (i.e., approval of a contract for a school security system, hiring of school security guards, approval of a Memorandum of Understanding with Local Law Enforcement or an outside behavioral health provider, expulsion of a student identified only by number following a hearing).

### **Requirements for the SSSC Related to Threat Assessment**

Article XIII-E specifically tasked the SSSC with completing the following deliverables within 180 days of enactment (December 25, 2019):

- Research, develop, and publish best practices;
- Develop and offer, at no cost and through online systems:
  - Model training programs for 1) members of Threat Assessment Teams, and 2) school employees; and
  - Model information materials for 1) students (age-appropriate), 2) parents/guardians, and 3) school employees.
- Develop model procedures and guidelines for school entities that:
  - Establish standard definitions and terminology;
  - Reflect best practices in identifying, assessing, and responding to threats; and
  - Provide for flexibility and local decision-making.
- Comply with federal and state student record confidentiality laws and regulations; and
- Provide guidance to teams for communications and coordination with Student Assistance Program (SAP) and special education teams.

In addition to these immediate responsibilities, the SSSC must also do the following on an annual/ongoing basis:

- Review school entity threat assessment reports and use them when developing requirements;
- Review training programs, informational materials, and model procedures and guidelines, making updates and revisions as necessary; and
- Notify school entities when training programs, informational materials, model procedures and guidelines become available or are updated or revised.

## BEFORE YOU GET STARTED

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When implemented with fidelity and care, multidisciplinary threat assessment procedures can help school entities effectively identify and mitigate risks to the health and safety of students and the school community. However, if implemented without fidelity and care, these same procedures can also have harmful unintended consequences. Before school entities institute Threat Assessment Teams and related processes, it is important to consider the following issues and guardrails:

- **The threat assessment process is multidisciplinary and collaborative by design and should not be implemented in isolation.** Teams should include multiple members within the decision-making process regarding cases presented to them for consideration and should also be well-versed in the threat assessment process. Threat Assessment Teams should also consult with their school solicitor, as well as other school entities, local law enforcement, and other partners if they are unsure how to proceed with a particular case, and should document any consultation with outside resources.
- **It is important to note that the completion of a threat assessment does not excuse a school entity from complying with all requirements for students with disabilities provided through the federal Individuals with Disabilities Education Act (IDEA) or Americans with Disabilities Act (ADA), as well as state laws.** The threat assessment process should be completed concurrent to any federally or state mandated processes to determine if a student's needs are being met by their current services. Conversely, whether a student has an Individualized Education Program (IEP) or not does not mean a school entity cannot complete a threat assessment.
- School entities should **review their policies, practices, and procedures** – including their **Code of Conduct** and any **Memoranda of Understanding (MOU) with outside agencies** – to ensure they are aligned with recommended best practices and requirements of current state and federal law.
- Depending upon information provided to a school entity's Threat Assessment Team or to local law enforcement, **the threat assessment process may need to be postponed in lieu of immediate action to prevent serious injury or death**, in accordance with procedures and protocols articulated within the school entity's Emergency Operations Plan.<sup>53</sup> Teams should reconvene the process once the environment is made safe, including providing documentation of the incident in coordination with relevant parties.
- Finally, while Threat Assessment Teams may receive a wide range of reported concerns, its role is limited to intervening only in situations with the greatest likelihood the behavior could result in harm. **The threat assessment process is not intended to replace existing supports, referrals, and services provided through other school-based intervention efforts like SAP, MTSS/PBIS, Crisis Teams, etc.** School entities should **promote and monitor coordination** between its Threat Assessment Team(s) and other school-based teams to **ensure appropriate referrals and responses**, including **evaluating relevant data** and **conducting after-action reviews through an equity lens** to identify and learn from successes and failures and make necessary improvements.

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<sup>53</sup> *Emergency Planning*, Pennsylvania Department of Education, Office for Safe Schools, <https://www.education.pa.gov/Schools/safeschools/emergencyplanning/Pages/default.aspx>.

## MODEL PROCEDURES FOR K-12 THREAT ASSESSMENT PROGRAMS<sup>54</sup>

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### Purpose

The purpose of this document is to establish procedures for the assessment and intervention with students whose behavior poses a threat to themselves, other students, school staff, the community, or others.

### Step 1: Create and Promote a Safe, Positive School Climate

Preventing targeted violence relies primarily on developing positive school climates that are built on foundations of safety, respect, trust, and social and emotional support. Schools can build safe, positive school climates by supporting diversity, open communication, conflict resolution, and addressing issues like bullying and harassment.

- Schools should encourage teachers and staff to **build positive, healthy, and trusting relationships with students and their families**, and should work to **break down “codes of silence”** by helping students feel empowered to **share concerns with trusted adults**. Maintaining **professional standards and boundaries** with students is foundational to these efforts, and to ensure that relationships are healthy and developmentally appropriate.
- Helping students feel more **connected to their classmates and school community** can foster a positive school climate. This can include **identifying clubs or teams at school** students can join or encouraging students to develop their own group.
- Frameworks like **school-wide Positive Behavioral Interventions and Supports (PBIS)** can promote safe, supportive school climates by actively teaching students what appropriate behavior looks like in a variety of settings, and by focusing on encouraging good behavior.



#### **TOOLS AND RESOURCES: Create and Support a Safe, Positive School Climate**

For a comprehensive listing of available resources and supports related to violence prevention and creating positive school climates, among other topics, please see **Appendix D (Additional Resources for School Entities)** on page 50.

### Step 2: Establish a Threat Assessment Team

The first step in implementing these procedures is to establish a multidisciplinary Threat Assessment Team that will direct, manage, and document the school entity’s threat assessment process. The Team is responsible for receiving reports from school community members regarding behaviors and situations that are concerning, gather additional information, evaluate the risk posed to the community, and develop appropriate intervention and management strategies.<sup>55</sup>

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<sup>54</sup> Adapted from [Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines, Second Edition](#), Virginia Department of Criminal Justice Services, August 2016; and [Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence](#), National Threat Assessment Center, July 2018.

<sup>55</sup> PA Public School Code, [Article XIII-E](#). Threat Assessment.

- Under state law, **members of a school entity’s Threat Assessment Team(s)** must be identified by the chief school administrator, in consultation with the Safety and Security Coordinator.<sup>56</sup> A school entity must also **designate a Team Leader** for each Threat Assessment Team, usually a senior administrator within the school.



**THINGS TO CONSIDER: What’s in a Name?<sup>57</sup>**

While Pennsylvania state law requires that school entities establish “Threat Assessment Teams,” schools can choose an alternative name. For example, some schools have opted to use the label “Assessment and Care Team” to encourage involvement from those who might be concerned about a student, and to focus on getting a student access to needed resources and supports. Other schools have chosen to refer to this group as a “Behavioral Intervention Team” to focus on a spectrum of concerning behaviors that a student may be exhibiting. Finally, some schools have continued to refer to their groups as “Threat Assessment Team” to highlight the heightened sense of concern about a student who is identified. Regardless of the team’s title, all members of the school community should be informed that this is the team assigned responsibility for completing the threat assessment process, and how to submit information to the team.

- **Teams should include personnel from a variety of disciplines and areas within the school community** to ensure different points of view are represented in the threat assessment process. Article XIII-E of the PA Public School Code requires that teams include certain individuals; see Figure 3 below, for a list of required and optional/suggested members. Importantly, school entities should **include individuals who have familiarity and rapport with students** referred to the Threat Assessment Team.

**Figure 3. Threat Assessment Team Members – Pennsylvania Requirements<sup>58</sup>**

Required Members (Article XIII-E)	Optional Members
<ul style="list-style-type: none"> <li>• Individuals with expertise in:                             <ul style="list-style-type: none"> <li>○ School health;</li> <li>○ Counseling, school psychology, or social work;</li> <li>○ Special education; and</li> <li>○ School administration</li> </ul> </li> <li>• School Safety and Security Coordinator</li> </ul>	<ul style="list-style-type: none"> <li>• Other school staff or community resources who can assist with the threat assessment process.</li> </ul> <p><i>Examples: School security personnel; law enforcement agencies; behavioral health professionals; individuals receiving reports from the Safe2Say Something Program; SAP team members; juvenile probation professionals; etc.</i></p>

- The size of a Threat Assessment Team will vary depending on the school entity but is typically between **3-5 people**. School entities should also consider **identifying other individuals within**

<sup>56</sup> PA Public School Code, [Article XIII-E](#). Threat Assessment.

<sup>57</sup> Adapted from *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*, National Threat Assessment Center, July 2018.

<sup>58</sup> PA Public School Code, [Article XIII-E](#). Threat Assessment.

**the school community to consult** with as needed during a threat assessment but who are not part of the core Threat Assessment Team.

- School entities should consult with their solicitor regarding any **contractual or collective bargaining implications and confidentiality/privacy requirements** in assigning team members to the Threat Assessment Team.
- Team members must **work collaboratively** with each other, with other school staff, and (as appropriate) with community partners and resources to support the threat assessment and management process and ensure the safety of the school and its students and staff.
- Teams should **establish protocols and procedures** that are followed for each assessment. These should include identifying who will interview the student(s) of concern; who will talk to classmates, teachers, or parents/guardians; and who will be responsible for documentation. This will ensure members are aware of their own responsibilities and roles as well as those of their colleagues. This could also include **designating a subset of team members** to triage cases reported to the team (at least 2-3 individuals).
- In addition to meeting whenever concerning student behavior or situations arise, **Team members should meet on a regular basis** to provide opportunities to learn and work together so when a crisis does occur, the Team will be able to operate as a cohesive unit



#### **THINGS TO CONSIDER: Coordination with Other Multidisciplinary Teams**

Multidisciplinary threat assessment efforts are designed to work in conjunction with, and not in place of, existing programs and frameworks focused on promoting the safety, well-being, and success of all students, including:

- Student Assistance Program (SAP)
- Multi-Tiered Systems of Support (MTSS)
- Positive Behavior Interventions and Support (PBIS)
- School climate initiatives
- Trauma-informed approaches
- Social-emotional learning
- Suicide prevention and awareness ([Act 71 of 2014](#))

Article XIII-E allows school entities to satisfy requirements by assigning threat assessment responsibilities to an existing team, including SAP or *Safe2Say Something* Crisis Teams.

Pursuant to Article XIII-E of the PA Public School Code, PCCD recently published **guidance for coordination and communication with other school-based teams** for Threat Assessment Teams, with a focus on SAP and Special Education teams. More information and resources are available on PCCD's [School Safety and Security webpage](#).

### **Step 3: Define Prohibited and Concerning Behaviors<sup>59</sup>**

Schools should establish or modify policies, procedures, and codes of conduct defining prohibited behaviors that are unacceptable and warrant immediate intervention. These include threatening or

<sup>59</sup> Adapted from *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*, National Threat Assessment Center, July 2018.

engaging in violence, bringing a weapon to school, bullying or harassing others, as well as other concerning or criminal behaviors. **It is important to remember that concerning behaviors occur along a continuum**, and that interventions should reflect the level of risk and an evaluation of the unique needs of each student.

School entities should also consider ways **to identify behaviors that may not necessarily be indicative of violence but also warrant some type of intervention**. These include a marked decline in academic performance; increased absenteeism; withdrawal or isolation; sudden or dramatic changes in behavior or appearance; drug or alcohol use; and erratic, depressive, and other emotional or mental health concerns.

- **Coordination with other multidisciplinary teams** – including SAP, Special Education, and/or MTSS/PBIS – can help ensure that if these behaviors are observed or reported to the Team, appropriate resources and supports can be provided in the form of mentoring and counseling, mental/behavioral health care, tutoring, and/or social and family services.
- School entities and Teams should consider what the **threshold for intervention** they would like to establish, and what individual(s) or group(s) can intervene when the concerns are low risk vs. high risk, in consideration of relevant information regarding the student, such as whether the student has an IEP or 504 Plan.
- All school entities in Pennsylvania are also required to have a **youth suicide awareness and prevention policy** in place and must include in their **professional development plan** at least four hours of training in youth suicide awareness and prevention every five years for professional educators in school building serving students in grades 6-12.<sup>60</sup>



#### **TOOLS AND RESOURCES: Youth Suicide Awareness and Prevention**

- [National Suicide Prevention Lifeline: 1-800-273-8255 \(TALK\)](#)
    - **Crisis Text Line: Text “PA” to 741-741**
  - [Act 71 of 2014 – Youth Suicide Awareness and Prevention](#), PDE, Office for Safe Schools
  - [Suicide Prevention](#), PA Department of Human Services (DHS)
  - [Prevent Suicide PA Online Learning Center](#)
  - [Suicide Prevention in Pennsylvania Schools and Colleges Initiative](#), DHS Office of Mental Health and Substance Abuse Services (OMHSAS), Prevent Suicide PA
  - [Mental Health First Aid Training](#)
- During the assessment process, Teams may uncover **additional information** regarding statements, actions, or other behaviors of the student that can help determine whether the student is at risk of hurting themselves or others. Teams should consider parameters of obtaining this information within the context of **state and federal confidentiality and privacy laws** and should also only use this information specifically for the purpose of determining whether a risk is present. Additional information regarding state and federal confidentiality and privacy laws is available in the “School Threat Assessment Teams: Access to Information” section on page 10-11 of this document.

<sup>60</sup> [Act 71](#), PDE Office for Safe Schools.



### THINGS TO CONSIDER: Assessment for Students with Disabilities

Threat Assessment Teams should review information about a student's disability, in collaboration with adults who are familiar with the student, such as members of the student's IEP Team, when conducting a threat assessment, to understand how, if at all, the student's disability impacts their behavior and communication. The Team should also consider what behavior supports are included in the student's IEP or Section 504 plan.

More information regarding steps and considerations that both Threat Assessment Teams and special education teams should take when conducting an assessment of a student with disabilities is available in the ***Questions and Answers on Threat Assessment Procedures and School-Based Intervention Teams*** guidance document published by PCCD and available on PCCD's [School Safety and Security webpage](#).

## Step 4: Create or Identify a Central Reporting Mechanism

When members of a school community have concerns about a student's actions or behavior, they should have a centralized mechanism to report those concerns to the Threat Assessment Team.

- Threat Assessment Teams in Pennsylvania are required to **make informational materials available** to school 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, as well as **how to report their concerns**. This can include reporting through the **Safe2Say Program**, which went online in January 2019, or through other school reporting mechanisms and tools.<sup>61</sup>
- Under state law, Teams must also **ensure that school employees are aware of the staff members who are appointed to the Threat Assessment Team(s)**, and how to report threatening or at-risk behavior, including through the *Safe2Say Something* Program.<sup>62</sup> While not required under statute, it is recommended that students, teachers, staff, School Resource Officers (SROs), other school personnel, and parents/guardians be provided **training and guidance** on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and how they should report that information.<sup>63</sup>
- Teams should consider **designating an individual responsible for monitoring all incoming reports and develop protocols for quickly assessing, responding, and making appropriate determinations and referrals**; this should include an **immediate response** when someone's safety is concerned. State law requires that Threat Assessment Teams **assist in assessing reports received through the Safe2Say Something Program**.<sup>64</sup>
- In providing information and training to members of the school community, Threat Assessment Teams should emphasize **options for providing information anonymously** (such as through the

<sup>61</sup> PA Public School Code, [Article XIII-E](#).

<sup>62</sup> PA Public School Code, [Article XIII-E](#).

<sup>63</sup> *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*, National Threat Assessment Center, July 2018.

<sup>64</sup> PA Public School Code, [Article XIII-E](#), Section 1302-E. Threat assessment teams.



*Safe2Say Something* Program), and that reports will be acted upon, kept confidential, and handled appropriately.<sup>65</sup>



#### **THINGS TO CONSIDER: Utilizing the *Safe2Say Something* Program**

In 2018, the General Assembly passed Act 44 mandating the establishment and use of the *Safe2Say Something* anonymous reporting system by every Pennsylvania school entity by January 14, 2019. The [Safe2Say Something Program](#) is managed by the Pennsylvania Office of the Attorney General (OAG) and teaches students, educators, and administrators how 1) to recognize the signs and signals of individuals who may be at risk of hurting themselves or others; and 2) to anonymously report this information through the *Safe2Say Something* app, website, or 24/7 Crisis Center Hotline.

The *Safe2Say Something* program works in the following ways:

1. A tip is submitted via mobile app, website, or phone call – arriving first at the *Safe2Say Something* Crisis Center.
2. OAG Crisis Center analysts vet and triage the tip, then engage the tipster in anonymous two-way chat in order to provide detailed and immediately actionable information to schools and 911 County Dispatch. Analysts are trained to categorize each tip as either “Life Safety – Imminent and In-Progress,” “Non-Life Safety Crime/Violence,” “Non-Life Safety,” or “Non-Notification” to help prioritize tips.
3. Crisis Center analysts deliver the tip to the impacted school and, as needed, local law enforcement via 911 County Dispatch.
4. The school and, as needed, local law enforcement, assess and intervene with the at-risk individual.
5. The school then closes out the tip and reports actions taken as a record for their school.

### **Step 5: Determine the Threshold for Law Enforcement Intervention**

It is important to remember that most of the incidents or concerns that are commonly reported can be appropriately handled by school personnel using school or community-based resources. For instance, the most common types of reports submitted to Pennsylvania’s Office of the Attorney General via the *Safe2Say Something* Program during the 2018-2019 school year were related to bullying/cyberbullying, cutting/self-harm, suicide/suicide ideation, depression/anxiety, drug use, and other concerns.<sup>66</sup> Many of these reports may not require the involvement of law enforcement; those that do, such as threats of against school or a person, were the eighth and tenth most common types of reports, respectively.<sup>67</sup>

- Pennsylvania’s **school entities must establish a memorandum of understanding (MOU) with local law enforcement agencies** that have jurisdiction over property of the school entity.<sup>68</sup> These MOUs must address a variety of issues, including reporting and information exchange guidelines, priorities of each party, and notification of incidents to law enforcement. School entities should consider updating MOUs to reflect their threat assessment protocols, including how local law enforcement will be engaged on Threat Assessment Teams.

<sup>65</sup> *Enhancing School Safety Using a Threat Assessment Model*, National Threat Assessment Center, July 2018.

<sup>66</sup> [Safe2Say Something Annual Report: 2018-2019 School Year](#), Office of Attorney General, Commonwealth of Pennsylvania, July 2019.

<sup>67</sup> [Safe2Say Something Annual Report: 2018-2019 School Year](#).

<sup>68</sup> 24 P.S. § 13-1303-A; 22 Pa. Code §10.11

- Both best practice and Pennsylvania state law<sup>69</sup> require that reports regarding student behaviors **involving weapons, threats of violence, physical violence, or concerns about an individual’s safety** should immediately be reported to local law enforcement in accordance with the procedures set forth in the school entity’s Memorandum of Understanding with local law enforcement and Board policies.<sup>70</sup> Both School Code and state regulations define the types of incidents that must be reported to law enforcement, and those that may be reported at the discretion of the school entity.<sup>71</sup> When reporting an incident to local law enforcement, specific information must be provided, which will help inform law enforcement of the best way to work with the school entity in handling the situation and meeting the needs of all students involved. The notification must contain specific information regarding the student and incident, which includes:
  - Nature of the incident.
  - Names and ages of the individuals involved.
  - Weapons involved in the incident (and whether they have been secured).
  - Injuries.
  - Whether the incident involves a student with a disability, the type of disability and its impact on the student’s behavior.
  - Other information as is known to the school entity and believed to be relevant to the incident.

In responding to students who have committed an incident, the law specifically states that school entities may consider using available school-based programs, such as school-wide positive behavior supports (PBIS, MTSS) to address student behavior, and shall notify the local law enforcement agency of the student’s placement in a program.<sup>72</sup>



#### **THINGS TO CONSIDER: Immediate Notification Requirements for PA School Entities**

Section 1303-A of the PA Public School Code requires **immediate reporting of certain enumerated offenses by chief school administrators to local law enforcement** when are committed on school property, at any school-sponsored activity, or on a conveyance providing transportation to or from a school or school-sponsored activity.<sup>73</sup> These include attempts, solicitation, or conspiracy to commit any of the following:

- Homicide
- Aggravated assault
- Stalking
- Kidnapping
- Unlawful restraint
- Rape

<sup>69</sup> [22 Pa. Code, Chapter 10. Safe Schools. Section 10.21. Immediate Notification.](#)

<sup>70</sup> Note: School entities in Pennsylvania are also required to adopt a **youth suicide awareness and prevention policy** under Act 71 of 2014. Additional information is available on PDE’s Office for Safe Schools’ website: <https://www.education.pa.gov/Schools/safeschools/laws/Pages/Act71.aspx>.

<sup>71</sup> See 22 Pa. Code [§ 10.21 \(Immediate notification\)](#), [§ 10.22 \(Discretionary notification\)](#), [§ 10.23 \(Response and handling of a student with a disability\)](#), [§ 10.24 \(Emergency and nonemergency response and preparedness\)](#), and [§ 10.25 \(Notification to parents/guardians and Appendix A – Model Memorandum of Understanding\)](#).

<sup>72</sup> 22 Pa. Code § 10.21

<sup>73</sup> [24 P.S. § 1303-A.](#)

- Sexual assault
- Arson
- Institutional vandalism
- Burglary
- Criminal trespass
- Riot
- Possession of firearm by minor
- Possession, use or sale of a controlled substance or drug paraphernalia

When reporting an **incident committed by a student with a disability** to a law enforcement agency, the school entity must provide information required by state and federal laws and regulations, including **ensuring that copies of the special education and disciplinary records of the student are transmitted for consideration** by these authorities.

**NOTE:** The school entity should transmit these records only to the extent permitted by the Family Educational Rights and Privacy Act and other relevant laws. Copies of the school entity's procedures for behavior support, developed in accordance with a student's IEP, will also be provided to local law enforcement as appropriate.

In responding to students who commit one of these types of incidents, school entities can consider **utilizing available school-based programs**, such as schoolwide positive behavior supports, to address the student's behavior, as appropriate. School entities must notify local law enforcement agencies of the student's placement in the program when this option is taken.<sup>74</sup>

- School entities should consider and carefully define the **participation of local law enforcement or a School Resource Officer on a Threat Assessment Team**. If an SRO is not available to serve on the Team, school entities should establish a clear threshold for when **law enforcement will be asked to support or take over an assessment**. School entities should develop these protocols in compliance with the school entity's **Memorandum of Understanding with local law enforcement** regarding notification and response to incidents, while also considering **ways to prevent and address equity concerns**, like disproportionality. (For more information on how school entities should consider long-term monitoring and evaluation of threat assessment protocols, please see "Step 9: Long-Term Sustainment and Evaluation of Procedures" on page 34.)
- School entities should also ensure that local law enforcement agencies and school security personnel such as School Police Officers and SROs are provided with updated information regarding the **school entity's procedures on positive behavior support**, and are invited to school entity **training on the use of positive behavior support, de-escalation techniques and appropriate responses to student behavior** that may require intervention, in accordance with state regulations.

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<sup>74</sup> [22 Pa. Code, § 10.21. Immediate notification.](#)

## Step 6: Establish Assessment Procedures<sup>75</sup>

Threat Assessment Teams should establish clearly defined processes and procedures to guide their assessments and help the Team form an accurate understanding of a student's thinking, behavior, and circumstances to inform both the Team's assessment as well as identify appropriate interventions. These assessment protocols must meet requirements articulated in state law, and should also address the following best practices related to intake, assessment, and response:

- Teams should also work to **build rapport that can facilitate information gathering efforts** by demonstrating that their goal is to support students who may be struggling, while also ensuring that the student and school community are safe.
- **Maintain documentation** related to intake of reports, including what information is gathered; when, how, and where information was gathered; individuals interviewed or contacted during the process; the specific behaviors and circumstances that were of concern for a particular student/situation; and the strategies for intervention taken by the Team/school entity. (NOTE: Under state law, records/documentation developed or maintained by Threat Assessment Teams, as well as the report and information presented to the school entity's board of directors and submitted to the School Safety and Security Committee at PCCD are not subject to Pennsylvania's Right-to-Know Law.)



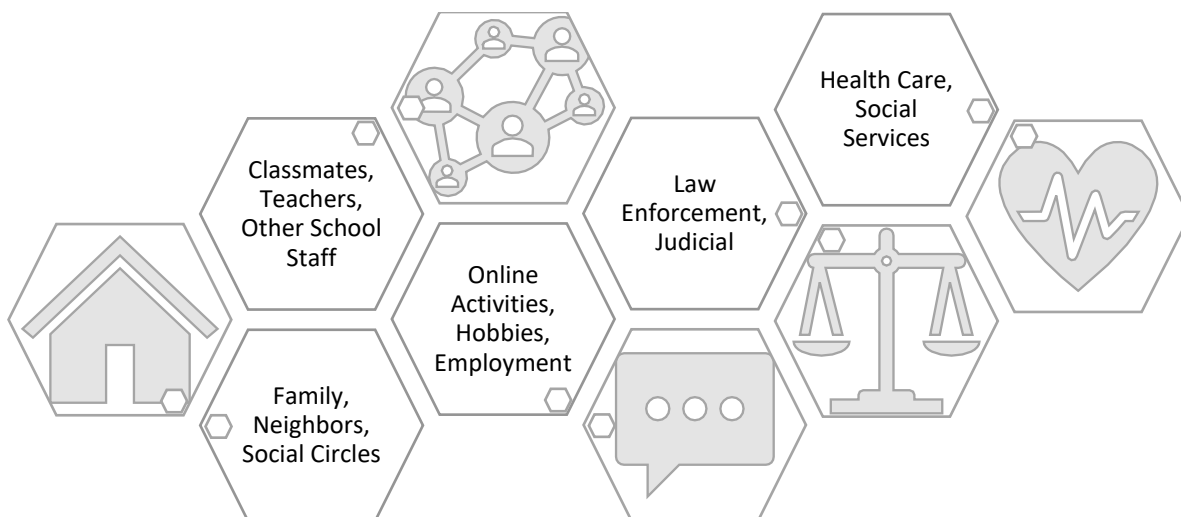
### TOOLS AND RESOURCES: Maintaining Documentation

- [Virginia Student Threat Assessment Guidelines \(VSTAG\) Sample Forms](#) – This free tool can be used and adapted by school entities to document key elements of the threat assessment process, including what was reported, findings from interviews, analysis of findings, determination of threat level, threat response strategies, case resolution or safety plan, and other information and resources.
  - [11 Questions to Guide Data Collection in a Threat Assessment Inquiry](#) – Developed as part of the U.S. Department of Education and U.S. Secret Service's *Threat Assessment Guide*.
  - [Brief Interview Outline for Individual Under Concern](#) – These interview questions/prompts were developed as part of the Kentucky Center for School Safety's 2008 *Emergency Management Guide*.
  - [Threat Assessment Template](#) – Word document/template developed by the Indiana Department of Education that can be adapted and utilized by school entities.
- **Use a community systems approach** that identifies sources that may have information regarding the student's actions and circumstances. Specifically, this means identifying and engaging individuals that have an existing relationship or frequently interacts with the student, as well as organizations or platforms that may be familiar with the student's behaviors. This is particularly important in terms of **evaluating the student's concerning behaviors and communications in the context of their age, social/emotional development, and other contexts**. While some students' behavior might seem unusual or concerning, they may be normal for adolescent behavior or in the context of a mental or developmental disorder. Gathering information from multiple sources, including those within and outside of a student's

<sup>75</sup> Unless otherwise noted, language in this section is adapted from the *Enhancing School Safety Using a Threat Assessment Model* guidelines published by the National Threat Assessment Center.

immediate circle, increases the likelihood that Teams can accurately assess the student’s risks and needs, and can also help determine appropriate interventions, supports, and resources.

**Figure 4: Community Systems Approach to Threat Assessment<sup>76</sup>**



- As part of their assessment process, Teams should review **academic, disciplinary, law enforcement, and other formal records** that may be related to the student. When reviewing school-based records, Teams should determine whether the student has been the subject of prior reports to school officials, especially if those reports involve concerning or threatening behaviors. This review of records should also include information about previous incidents, including any supports or interventions provided, to gauge what strategies might best address the student’s current situation. It is important to remember that Teams must comply with relevant federal and state laws protecting privacy of student information, as well as ensure that records are used for appropriate purposes that are relevant to the threat assessment process. School entities should consider what protocols, agreements and/or MOUs should be in place to facilitate the timely and appropriate sharing of information, and to provide safeguards against inappropriate use and/or redisclosure.
- Teams should organize their intake, information gathering, and assessment process around **several investigative themes/areas related to a student’s actions, circumstances, and any other relevant factors**. These investigative themes/areas should be based on those recommended by the U.S. Secret Service (see “Things to Consider,” below).



**THINGS TO CONSIDER: Key Themes to Guide Threat Assessment Investigations<sup>77</sup>**

Based on the U.S. Secret Service’s research, the following are recommended themes for Threat Assessment Teams to explore when conducting a threat assessment investigation:

<sup>76</sup> Adapted from *Enhancing School Safety Using a Threat Assessment Model*, National Threat Assessment Center, July 2018.

<sup>77</sup> Adapted from *Enhancing School Safety Using a Threat Assessment Model*, National Threat Assessment Center, July 2018.

- **Motives:** Understanding motive allows Teams to determine a student's goals, including how far they may be willing to go to achieve them, and can allow Teams to develop management strategies that can direct the student away from violent choices.
- **Communications:** Teams should look for concerning, unusual, bizarre, threatening, or violent communications the student made, while remembering that a student who has not made threatening statement may still be considering engaging in violence.
- **Inappropriate Interests:** Teams should gather information about whether the student has shown an inappropriate or heightened interest in concerning topics such as weapons, school shooters, mass attacks, or other types of violence.
- **Weapons Access:** In addition to determining whether a student has inappropriate interests or fascination with weapons, the Team should evaluate whether the student has access to weapons, including firearms, explosives, incendiary devices, bladed weapons, or combinations thereof.
- **Stressors:** Teams should gather information on stressors the student may be experiencing, including how they are coping and whether there are supportive friends or family who can help them overcome setbacks, challenges, or losses. Stressors can include those in or out of schools, such as coursework, friendships, romantic relationships, family issues, bullying/cyberbullying, etc.
- **Emotional and Developmental Issues:** Anxiety, depression, thoughts of suicide, and other mental health issues are important factors to consider when conducting an assessment, but it is critical that behaviors exhibited by a student with a diagnosed disorder or mental illness be evaluated in the context of their diagnosis and the student's known baseline of behavior.
- **Desperation or Despair:** Teams should assess whether a student feels hopeless, desperate, or out of options, including determining whether the student has previously experienced and managed these feelings, resources available for coping, etc.
- **Violence as an Option:** Teams should consider whether the student views violence as acceptable or the only way to solve problems, including if the student has used violence in the past to address issues.
- **Concerned Others:** Teams should evaluate whether others (parents/guardians, friends, classmates, teachers, etc.) who know the student are worried about the student's statements or behaviors and whether they have taken any actions in response to their concerns.
- **Capacity to Carry Out an Attack:** Teams should use available information to determine whether the student's thinking and behavior is organized enough to plan and execute an attack, and whether the student has the resources and capacity to carry it out.
- **Planning:** Because targeted attacks at school are rarely sudden or impulsive acts of violence, Teams should assess whether the student has made specific plans to execute harm toward themselves or others.
- **Consistency:** The Team should corroborate the student's statements to determine whether they are consistent with the student's actions and behaviors and with what other people say about the student. Inconsistencies could point to deliberate intent, or to an underlying issue that may raise concerns beyond the scope of a threat.
- **Protective Factors:** Finally, a thorough threat assessment requires an understanding of the full context of a student's behaviors and environment, including positive or prosocial influences and events. This includes determining whether a student has a positive, trusting relationship with an adult at school, and whether the student feels emotionally connected to other students/peers.

- Under state law, Threat Assessment Teams must also **ensure that parents/guardians are notified** whenever determinations/referrals take place. Article XIII-E of the PA Public School Code specifically requires that, upon preliminary determination that a student’s behavior may indicate a threat to themselves or others, the student’s building principal (or designee) must **immediately notify the student’s parent or guardian**. Parent/guardian **consent is also required for certain actions**, including referral of the student to a behavioral service provider, a healthcare provider, or a county agency. Importantly, nothing in state law precludes school entities from acting **immediately to address an imminent threat**, including prompt reporting to law enforcement.

### Step 7: Develop Options for Response and Interventions<sup>78</sup>

Once a Threat Assessment Team has completed a comprehensive and thorough assessment of a student/situation, it can evaluate whether there are factors present that indicate violence might be a possibility. When a determination is made, Teams can develop strategies that reduce the risk for engaging in violence and increase the likelihood of positive outcomes.

- Every student who comes to the Team’s attention must have an **individualized management plan** that reflects the unique resources and supports a student might need based on the information gathered during the assessment. Management plans should remain in place until the Team is no longer concerned about the student or the risk for violence.
- As described previously, more often than not, the Team may determine the likelihood that a student may engage in violent or harmful behaviors is low but may still **require monitoring or guidance** to cope with challenges, enhance resiliency, and/or learn more appropriate strategies to manage emotions.
- Teams should identify **resources to assist the student**, including both school and community-based services and supports, such as peer support programs, therapeutic counseling, life skills classes, tutoring, and/or mental or behavioral health care.



#### THINGS TO CONSIDER: Relevant Policies & Programs – Mental/Behavioral Health Services

- **Mental Health and Behavioral Health Services for Minors:** Act 147 of 2004 (35 P.S. §§ 10101.1-10101.2) addresses who can provide consent to voluntary mental health treatment for minors who are 14 years of age and less than 18 years of age in both inpatient and outpatient settings. The Mental Health Procedures Act (MHPA) applies to involuntary and inpatient treatment (50 P.S. § 7103, 55 Pa. Code §5100.4(a)). See [Consent to Mental Health Treatment for Minor Children](#) (OMHSAS Bulletin 18-01) for additional information.
- **School Based Health Services:** PA Public School Code requires certain school health services for all children of school age, regardless of the school setting. Those services include physical examinations and health screenings, as well as dental health. The PA Department of Health provides reimbursement for state mandated school health services through a state formula for reimbursement.
- **School-Based Violence Prevention** – DHS OMHSAS has supported Youth Mental Health First Aid and Question-Persuade-Refer (QPR) trainings across the

<sup>78</sup> Adapted from *Enhancing School Safety Using a Threat Assessment Model*, National Threat Assessment Center, July 2018.

commonwealth through both the Garrett Lee Smith (GLS) Youth Suicide Prevention Grant and the System of Care Partnership. Additional trainings on suicide risk assessment, safety planning, postvention, and family engagement have also been offered to schools through the GLS grant. Staff have also provided consultation for schools on policy development as well as the selection of staff and student education and training programs.

- **Pennsylvania Community of Practice (CoP) on School-Based Behavioral Health** – This community of cross-sector stakeholders share a commitment to the advancement of early childhood, school-age, and adult behavioral health and wellness, and is spearheaded by the PA Technical Assistance and Training Network (PaTTAN). The CoP’s goal is to support schools’ efforts to overcome non-academic barriers to learning for children and youth.
  - **Supporting Safe and Healthy Students (ESSA, Title IV Part A)**: Pennsylvania identified addressing the comprehensive needs of students through school-based supports and community partnerships, including through the Community Schools Framework, as a state priority for federal Title IV, Part A funding in its approved Consolidated State Plan under the Every Student Succeeds Act (ESSA).
- When considering the possibility of disciplinary action as part of management strategies, Teams and school administrators should consider how exclusionary discipline practices (such as suspension or expulsion) may affect their ability to monitor the student since **removing a student from school does not eliminate the risk to the school community**.
  - **Notify law enforcement immediately if a student is thinking about or planning to engage in violence** so they can help in managing the situation. *(See “Step 5: Determine the Threshold for Law Enforcement Intervention,” beginning on page 24, for more information about establishing thresholds for notifying law enforcement.)*
  - Threat Assessment Teams should **make referrals to the school entity’s Crisis Response Team and/or coordinate responses** when receiving reports of concerns about students who may pose a harm to themselves. (Note that immediate notification to law enforcement should still be made if there is an imminent threat to the safety of others.)
  - **Take steps to address the safety of any potential targets** if necessary, including altering and enhancing security procedures for schools or individuals. This can also include **creating a situation that is less prone to violence** by asking family or law enforcement to block the student’s access to weapons as part of broader efforts to connect the student with supports.
  - **Address the student’s motive** by removing or redirecting. This will be unique to each student, but strategies could include bullying prevention efforts or offering counseling to a student who is experiencing personal challenges. School entities can also **reduce the effect of stressors** by providing supports and resources that help them manage and overcome setbacks.



**Figure 5. Classifying Threats to Determine Response Strategies<sup>79</sup>**

<b>Threat Level</b>	<b>Criteria</b>	<b>Examples of Response Strategies</b>
<b>Low Risk Threat</b>	Individual/situation does not appear to pose a threat of violence or serious harm to self/others, and any exhibited issues/concerns can be resolved easily.	<i>No need to notify or take action to protect the person(s) to whom the threat was directed. Clarification, explanation, retraction, and/or apology issued; potential disciplinary action; potential referral to school or community-based resources, as appropriate.</i>
<b>Moderate Risk Threat</b>	Individual/situation does not appear to pose a threat of violence or serious harm to self/others at this time but exhibits behaviors that indicate a continuing intent and potential for future violence or serious harm to self/others and/or exhibits other concerning behavior that requires intervention.	<i>Typically, notifying intended target(s) of threat and taking precautions to protect them. Taking steps to monitor and supervise the subject, providing support and taking disciplinary action, if needed. Potential referral to school or community-based resources, as appropriate; for example, counseling, conflict mediation, or other interventions to reduce the threat of violence and address underlying conflicts or issues that led to the threat.</i>
<b>High Risk Threat</b>	Individual/situation appears to pose a threat of violence, exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the plan, and may also exhibit other concerning behavior(s) that require intervention. These include threatening behaviors indicating the intent, planning, or preparation to cause serious bodily injury or death (e.g., to rape, physically assault, and inflict serious injury, kill, or use weapons against <b>self or others</b> ).	<i>Notifying local law enforcement and consulting with School Safety and Security officials. Taking immediate precautions to protect potential victims (e.g., direct supervision of subject, notifying intended targets and parents/guardians, etc.). Taking disciplinary action, as appropriate. Where mental health or disability issues are reasonably believed to cause or contribute to violence risk, an assessment should be conducted by a qualified professional, such as a licensed psychologist.</i>
<b>Imminent Threat</b>	Individual/situation appears to pose a clear and immediate threat of serious violence toward self or others that requires containment and action to protect identified or identifiable target(s) and may also exhibit other concerning behavior that requires intervention.	<i>Immediate containment and action to protect identified target(s). Immediate referral to law enforcement and consultation with School Safety and Security personnel, as well as identifying emergency preparedness plans and strategies to manage the active situation.</i>

### **Step 8: Conduct Training and Provide Information to All Stakeholders**

As part of their work to implement threat assessment protocols as part of comprehensive school safety and violence prevention efforts, school entities should identify training needs for all relevant stakeholders, including the following groups:

- **Threat Assessment Team members:** Under Pennsylvania state law, school entities are required to facilitate opportunities for members of their Threat Assessment Team(s) to complete group or individual training consistent with nationally recognized best practices during paid working hours or as in-service training and credited toward continuing professional education or staff

<sup>79</sup> Adapted from [Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines: Second Edition \(2016\)](#), Virginia Department of Criminal Justice.

development requirements, as applicable.<sup>80</sup> This training must address the following minimum criteria: 1) responsibilities of Team members; 2) the process of identifying, reporting, assessing, responding to, and intervening with threats, including identifying and avoiding racial, cultural, or disability bias; and 3) confidentiality requirements under federal and state law.<sup>81</sup> Team members should also be familiar with laws, regulations, and policies that guide confidentiality and the handling of student and staff information (see Appendix D for more information).

- **Faculty, staff and administrators:** State law also requires that school entities **ensure school employees are informed of the existence and purpose of the Threat Assessment Team(s)**, including posting information on the school entity’s website and ensuring school employees know who has been appointed to the Team.<sup>82</sup> Threat Assessment Teams are also required to make information available to school employees regarding recognition of threatening or at-risk behavior, and how to report their concerns, including through the **Safe2Say Something Program or another school hotline**.<sup>83</sup> This helps school personnel become aware of procedures and protocols they should follow when concerning or threatening information or behaviors are observed. Informational materials and training should include information about the school entity’s Threat Assessment Team(s), including how to notify the Team(s), what information to share, and the steps school personnel can take to safely and appropriately intervene with concerning situations.<sup>84</sup> School entities are also encouraged – and in some cases, required – to provide training on other topics, such as suicide awareness and prevention, conflict resolution, mental health, and developmental disabilities, as part of efforts to promote safe and positive school climates.<sup>85</sup>
- **Students:** School entities in Pennsylvania must also **ensure students are informed** of the existence and purpose of the Team(s) under state law.<sup>86</sup> Threat Assessment Teams are also required to **provide age-appropriate information** to students regarding recognition of threatening or at-risk behavior as well as how to report their concerns, including through the **Safe2Say Something Program or other school hotline**.<sup>87,88</sup> School entities should consider ways to build on these efforts to make sure students are aware they can make a report to the Team or another trusted adult **anonymously**, that their information will be **followed-up on**, and will be kept **confidential**, based on the school entity’s legal and investigative requirements.<sup>89</sup> Training and information should also focus on the important role students play in promoting a safe, positive, and inclusive school climate, including ways they can safely step in and intervene if needed.

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<sup>80</sup> PA Public School Code, Article XIII-E. Section 1302-E. Threat assessment teams.

<sup>81</sup> PA Public School Code, Article XIII-E. Section 1302-E. Threat assessment teams.

<sup>82</sup> PA Public School Code, Article XIII-E. Section 1302-E. Threat assessment teams.

<sup>83</sup> PA Public School Code, Article XIII-E. Section 1302-E. Threat assessment teams.

<sup>84</sup> *Enhancing School Safety Using a Threat Assessment Model*, National Threat Assessment Center, July 2018.

<sup>85</sup> For a comprehensive summary of relevant laws and regulations, including requirements for school employee professional development and training related to school safety and security, please see [PDE’s Office for Safe Schools’ webpage](#) and [Pennsylvania Compilation of School Discipline Laws and Regulations](#), U.S. Department of Education, April 2019.

<sup>86</sup> PA Public School Code, Article XIII-E. Section 1302-E. Threat assessment teams.

<sup>87</sup> PA Public School Code, Article XIII-E.

<sup>88</sup> *Safe2Say Something*, <https://www.safe2saypa.org/>.

<sup>89</sup> Adapted from *Enhancing School Safety Using a Threat Assessment Model*, National Threat Assessment Center, July 2018.



### THINGS TO CONSIDER: *Safe2Say Something* Training

Free online and in-person training for students and other resources for schools are available through the PA Office of Attorney General's *Safe2Say Something* Program. The "[School Resources](#)" webpage on *Safe2Say Something*'s website includes Frequently Asked Questions guidance, informational materials, and training materials specifically designed for students.

The *Safe2Say Something* student training provides information about different types of actions, behaviors, and situations that might be harmful or dangerous, and how to share those concerns using the tip line or reporting app. Informational materials, including handouts, are also available for school entities.

- **Parents and families:** School entities should also **ensure that information is available for parents and families regarding the threat assessment process** in place at their child's school, and their role in that process.<sup>90</sup> It is recommended that information for parents/families provide clear instructions on who to call, when, and what information they should be ready to provide. Parent trainings can also provide information on available resources and can **reduce the stigma** around mental, emotional, or developmental issues.<sup>91</sup> Information for parents/families should be provided in a language and format that is accessible and easy to understand.
- **Law enforcement and SROs:** School entities should consider **developing relationships with local law enforcement agencies**, so they are aware of the school's threat assessment process, as well as their own responsibilities if a threat is identified. Training for law enforcement and SROs should review emergency response procedures as well as building layouts.<sup>92</sup>



### TOOLS AND RESOURCES: Training, Informational Materials & Other Resources from PCCD

**PRELIMINARY RESOURCES (2019-20 School Year):** PCCD's School Safety and Security Committee recently approved **preliminary model resources** to aid school entities as they begin planning for the Commonwealth's new threat assessment requirements. **Model informational materials** for students, parents/guardians, and school employees as well as **guidance** for threat assessment teams' coordination and communication with other school-based response/intervention teams are available on PCCD's [School Safety and Security webpage](#).

**COMPREHENSIVE RESOURCES (2020-21 School Year and Beyond):** In addition to these preliminary resources, in October 2019, PCCD secured a **3-year federal grant** through the **U.S. Department of Justice's STOP School Violence Technology and Threat Assessment Solutions for Safer Schools Program** to support the development and launch of a comprehensive **Pennsylvania K-12 Threat Assessment Technical Assistance and Training Network**.

- Through this federal support, PCCD will engage a qualified entity to design and deliver **free evidence-based threat assessment training curricula and supporting resources** tailored for K-12 multidisciplinary teams in Pennsylvania.

<sup>90</sup> PA Public School Code, [Article XIII-E](#); *Enhancing School Safety Using a Threat Assessment Model*, National Threat Assessment Center, July 2018.

<sup>91</sup> *Enhancing School Safety Using a Threat Assessment Model*, National Threat Assessment Center, July 2018.

<sup>92</sup> PA Public School Code, [Article XIII-E](#); *Enhancing School Safety Using a Threat Assessment Model*, National Threat Assessment Center, July 2018.

- PCCD will launch a **comprehensive online training platform** and host **regional in-person “train the trainer” sessions** across the Commonwealth during the 2020-2021 school year – all at **no cost** to school entities or their partners in threat assessment.
- The initiative will also provide **complimentary technical assistance and other supports** directly to at least 75 school entities each year seeking to establish or enhance multidisciplinary threat assessment teams.

### Step 9: Promoting Equity, Continuous Improvement, and Sustainability

As described earlier in this document, when implemented with fidelity and care, multidisciplinary threat assessment protocols can help school entities effectively identify and mitigate risks to the health and safety of students and the school community. However, if implemented without fidelity and care to address issues like implicit bias, these same protocols can also exacerbate systemic problems like exclusionary disciplinary practices and the school-to-prison pipeline, which disproportionately impact students of color and students with disabilities.

- Schools should **engage stakeholders – including students, parents, families, educators, and community members – in all phases of planning and implementation** to ensure that threat assessment protocols are culturally responsive and trauma-informed.
- School entities should identify **metrics and goals** to determine how effective the threat assessment process is and whether any **unintended consequences or harm** have occurred as a result of new procedures. These goals and measures should be **connected to broader school priorities and initiatives**, informed by an **equity lens**, and should be reviewed frequently by the Threat Assessment Team(s), school administrators, and community members. For instance, school entities could track the **number of threat assessment cases** initiated and completed by grade; **source(s) of concern** (i.e., reporter type); the **student-level outcomes** (referral, intervention); **characteristics** of students referred to Threat Assessment Team vs. other school-based interventions (i.e., race/ethnicity, disability status, etc.); **timeliness of assessment**; **training needs and outcomes** for students, faculty/staff, and others; and **other measures** that can indicate whether protocols are being implemented with fidelity.



#### **THINGS TO CONSIDER: Availability of Funding and Training Resources through PCCD**

As described previously in these *Guidelines*, eligible school entities can apply for funding through **PCCD’s School Safety and Security Grant Program** to support activities and costs associated with planning, implementing, and sustaining threat assessment protocols. Additional information regarding funding criteria and resources for applicants is available on [PCCD’s School Safety and Security webpage](#).

In October 2019, PCCD was awarded a 3-year **federal grant from the U.S. Department of Justice** to develop a **K-12 School Threat Assessment Training and Technical Assistance Network**. The Network will develop and launch regional in-person and online trainings available at no cost to school entities in Pennsylvania beginning in fall 2020 and will provide technical assistance and support for schools across the Commonwealth.



#### **TOOLS AND RESOURCES: Measuring Impact on Students and School Communities**

- [Civil Rights Data Collection \(CRDC\)](#), U.S. Department of Education, Office for Civil Rights.
- [Data and Reporting](#), PDE
- [Future Ready PA Index](#), PDE
- [KIDS COUNT Data Center](#), Annie E. Casey Foundation
- [Pennsylvania Youth Survey \(PAYS\)](#), PCCD
- [Violent Crime](#), U.S. Department of Justice, Office of Justice Programs, Bureau of Justice Statistics
- [Youth Risk Behavior Surveillance System](#), CDC
- Safe2Say Something Annual Report Data

## Appendix A: Article XIII-E of PA Public School Code

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### Section 1301-E. Definitions.

The following words and phrases when used in this article shall have the meanings given to them in this section unless the context clearly indicates otherwise:

"Behavioral service providers." The term 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.

"Chief school administrator." A superintendent of a school district, executive director of an intermediate unit, administrative director of an area career and technical school or chief executive officer of a charter school, regional charter school or cyber charter school.

"Committee." The School Safety and Security Committee established under section 1302-B.

"County agency." The term includes, but is not limited to, a county children and youth agency, drug and alcohol service agency, behavioral or mental health agency or other human or social services agency.

"Law enforcement agency." As defined in section 1302-D.

"Safe2Say Program." The Safe2Say Program established under Article XIII-D.

"School entity." A school district, intermediate unit, area career and technical school, charter school, regional charter school or cyber charter school.

"School security personnel." A school police officer, school resource officer or school security guard appointed or employed under Article XIII-C.

"Student assistance program." As defined in 22 Pa. Code § 12.16 (relating to definitions).

"Team." A threat assessment team established by a school entity under section 1302-E(a).

### Section 1302-E. Threat assessment teams.

(a) Duties of school entities and chief school administrators.--The following shall apply:

(1) Each school entity shall establish at least one team as provided under subsection (b) for the assessment of and intervention with students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others.

(2) Each chief school administrator or a designee, after consultation with the school entity's safety and security coordinator, shall:

(i) Appoint the members of the team and designate a member to serve as team leader.

(ii) Ensure and establish procedures for the implementation of this section.

(iii) Facilitate opportunities for members of the team to complete group or individual training consistent with nationally recognized best practices during paid working hours or as in-service training.

(iv) Ensure that students, school employees and parents and guardians are informed of the existence and purpose of the team. The information under this subparagraph shall be posted on the school entity's publicly accessible Internet website.

(v) Annually develop and present to the school entity's board of directors at an executive session a report generally outlining the school entity's approach to threat assessment. The report shall also be submitted to the school entity's school safety and security coordinator for inclusion in the required report under section 1309-B(c)(5) to the committee, which shall include:

- (A) A verification that the school entity is in compliance with this article.
- (B) The number and composition of established teams.
- (C) The total number of threats assessed in the school entity.
- (D) Any additional information determined by the chief school administrator or designee.

(vi) Annually present to the school entity's board of directors at an executive session the following:

- (A) A summary of interactions with outside law enforcement, juvenile probation and behavioral service providers.
- (B) An assessment of the operation of the school entity's teams.
- (C) Recommendations for improvement of the school entity's threat assessment processes.
- (D) Any additional information determined by the chief school administrator or designee.

(b) Team requirements.--The following shall apply to teams established under subsection (a):

(1) Each team shall:

(i) Include individuals with expertise in:

- (A) School health.
- (B) Counseling, school psychology or social work.
- (C) Special education.
- (D) School administration.

(ii) Include:

- (A) The school safety and security coordinator appointed under section 1309-B or a designee.
- (B) Other school staff or community resources who may serve as regular team members or be consulted during the threat assessment process, as appropriate, and as determined necessary by the team, including:
  - (I) School security personnel.
  - (II) Law enforcement agency representation.
  - (III) Behavioral health professionals.
  - (IV) The individual identified by the school entity to receive reports from the Safe2Say Program.
  - (V) An individual who serves on the student assistance program.
  - (VI) Juvenile probation professionals.

(iii) Have a designated leader.

- (iv) Be responsible, at a minimum, for the following:
  - (A) Making age-appropriate informational materials available 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 their concerns, including through the Safe2Say Program.
  - (B) Making informational materials available to school 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 their concerns, including through the Safe2Say Program.
  - (C) Ensuring that school employees are aware of the staff members who are appointed to the team and how to report threatening or at-risk behavior, including through the Safe2Say program.
  - (D) Assisting in assessing and responding to reports received through the Safe2Say Program. Where a school entity has only one team, that team may also serve as the school entity's team for assessing and responding to reports received through the Safe2Say Program.
  - (E) Assessing and responding to reports of students exhibiting self-harm or suicide risk factors or warning signs as provided for under section 1526.
  - (F) Assessing, responding and making appropriate determinations and referrals under subsection (c) based on the information available to the team. The team, when appropriate, may coordinate with the student assistance program.
  - (G) Providing required information to the chief school administrator or designee to make the report provided for under subsection (a)(2)(v).
  
- (v) Ensure that parents and guardians are notified as provided under subsection (c).
  
- (vi) Undergo training which shall address, at a minimum, the following:
  - (A) Responsibilities of team members.
  - (B) The process of identifying, reporting, assessing, responding to and intervening with threats, including identifying and avoiding racial, cultural or disability bias.
  - (C) Confidentiality requirements under Federal and State law.

(2) The training required under this section shall be credited toward a professional educator's continuing professional education requirement under section 1205.2, any staff development requirements for paraprofessionals under 22 Pa. Code § 14.105 (relating to personnel), a school or system leader's continuing professional education requirement under section 1205.5 and the school safety and security training required under section 1310-B.

(3) A school entity may satisfy the requirements of subsection (a)(1) by assigning the duties listed under paragraph (1) to an existing team established by the school entity. For purposes of this paragraph, the existing team established may include, but is not limited to, the student assistance program.

(4) A team established by a school entity may serve one or more schools within the school entity.



*Model K-12 Threat Assessment Procedures and Guidelines*

(c) Notification and referral.--Upon a preliminary determination that a student's behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others, the following shall apply:

- (1) The team shall immediately notify the chief school administrator or a designee, the student's building principal and the school safety and security coordinator. The building principal or designee shall then immediately notify the student's parent or guardian.
- (2) Following notification of the parent or guardian, the team may refer the student, as appropriate, to:
  - (i) a student assistance program;
  - (ii) a law enforcement agency;
  - (iii) an evaluation under the Individuals with Disabilities Education Act (Public Law 91-230, 20 U.S.C. § 1400 et seq.) or section 504 of the Rehabilitation Act of 1973 (Public Law 93-112, 29 U.S.C. § 701 et seq.);
  - (iv) a student's existing individualized education program team established under the Individuals with Disabilities Education Act and 22 Pa. Code Ch. 14 (relating to special education services and programs); or
  - (v) an existing team established to implement a student's section 504 service agreement established under section 504 of the Rehabilitation Act of 1973 and 22 Pa. Code Ch. 15 (relating to protected handicapped students).
- (3) A parent or guardian shall provide consent prior to a team referring a student to:
  - (i) a behavioral service provider;
  - (ii) a health care provider; or
  - (iii) a county agency.
- (4) Nothing in this section shall:
  - (i) Preclude school employees from acting immediately to address an imminent threat. Imminent threats and emergencies shall be promptly reported to a law enforcement agency.
  - (ii) Limit the responsibilities of school employees or other mandated reporters to report suspected child abuse as required by law.
  - (iii) Limit the authority of a school entity to refer a student to the student assistance program without referral by a team, so long as the student's behavior does not indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others.

(d) Access to student information.--In order to carry out the duties under subsections (b) and (c) and facilitate the timely assessment of, and intervention with, students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others, a team shall have access to the following student information to the extent permissible under Federal law:

- (1) Notwithstanding any provision of section 1409 to the contrary, student health records.
- (2) Prior school disciplinary records.
- (3) Records or information shared with the school entity under Article XIII-A and 42 Pa.C.S. § 6341(b.1) (relating to adjudication).
- (4) Records of any prior behavioral or mental health or psychological evaluations or screenings maintained by the school entity.

*Model K-12 Threat Assessment Procedures and Guidelines*

(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 entity.

(e) Cooperation of county agency or juvenile probation department.--Notwithstanding 42 Pa.C.S. § 6352.2 (relating to interagency information sharing), upon a preliminary determination that a student's behavior indicates a threat to the safety of the student, other students, school employees, school facilities, the community or others, a 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 the preliminary determination. The county agency or juvenile probation department shall comply with the team's request except as prohibited by the following:

(1) 42 Pa.C.S. § 5944 (relating to confidential communications to psychiatrists or licensed psychologists).

(2) The act of February 13, 1970 (P.L.19, No.10), entitled "An act enabling certain minors to consent to medical, dental and health services, declaring consent unnecessary under certain circumstances."

(3) The act of July 9, 1976 (P.L.817, No.143), known as the Mental Health Procedures Act.

(4) The act of November 29, 1990 (P.L.585, No.148), known as the Confidentiality of HIV-Related Information Act.

(5) Federal law, including the Family Educational Rights and Privacy Act of 1974 (Public Law 90-247, 20 U.S.C. § 1232g), the Individuals with Disabilities Education Act, the Health Insurance Portability and Accountability Act of 1996 (Public Law 104-191, 110 Stat. 1936), and the procedures, limitations and criteria set forth in regulations adopted by the United States Department of Health and Human Services relating to the confidentiality of drug and alcohol treatment records.

(f) Use of information or records.--The team shall use the information or records obtained under subsection (d) or (e) in fulfilling the team's duty to evaluate a threat or the recommended disposition of a threat. No member of a team may redisclose any record or information obtained under this section or otherwise use any record of a student beyond the purpose for which the disclosure was made to the team.

(g) Disclosure.--The following shall apply:

(1) Records or documentation developed or maintained by a team shall not be subject to the act of February 14, 2008 (P.L.6, No.3), known as the Right-to-Know Law.

(2) The report and information presented to the school entity's board of directors and submitted to the committee under subsection (a)(2)(v) shall not be subject to the Right-to-Know Law.

(3) School entities shall not be required to report any data on the functioning of the team other than specifically required under this article.

**Compiler's Note:** Section 24 of Act 18 of 2019 provided that the amendment or addition of section 1320-B(1) and this section shall apply beginning in the 2021-2022 school year.

**Section 1303-E. Threat assessment guidelines, training and information materials.**

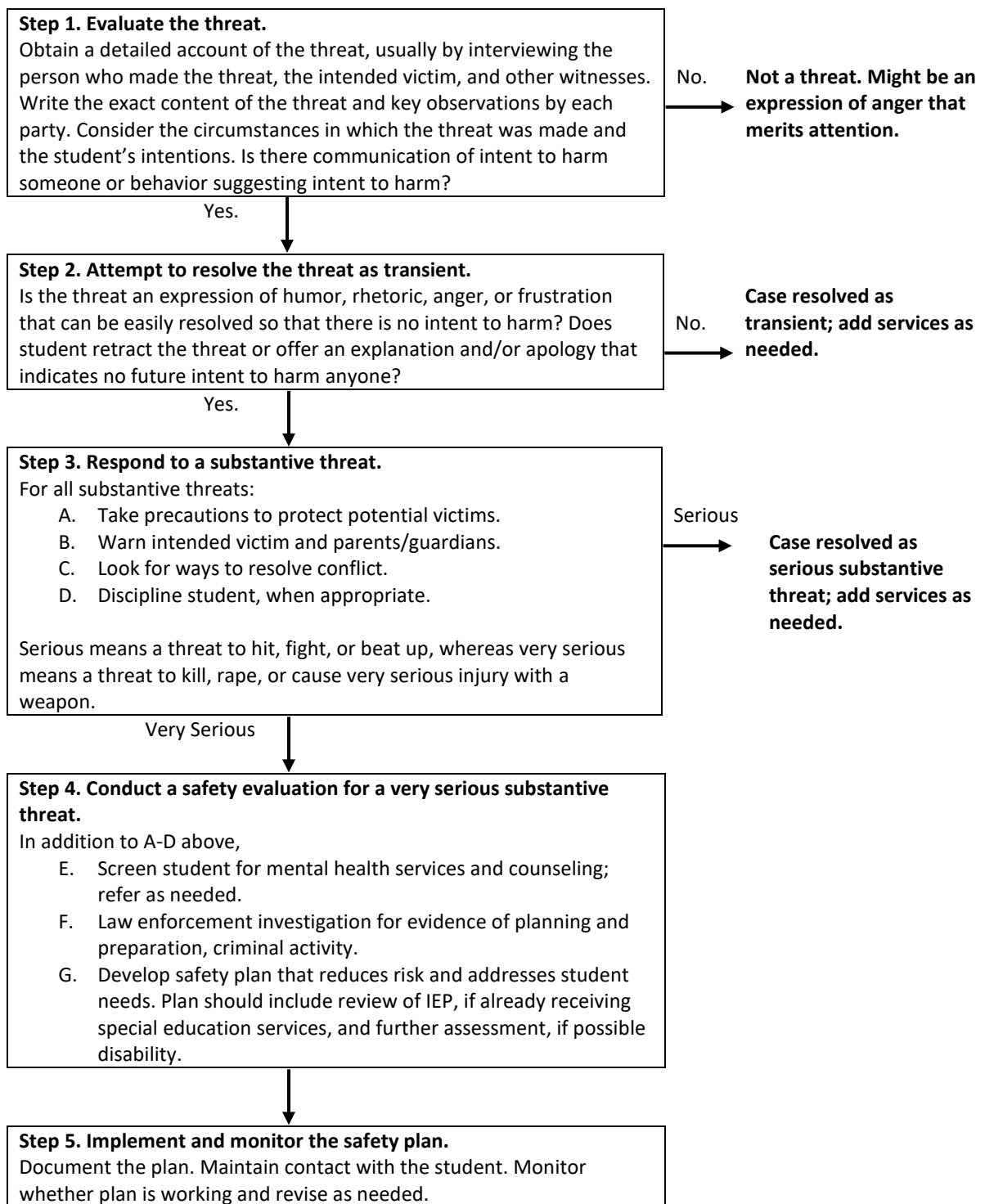
(a) Duties of committee.--No later than 180 days from the effective date of this section, the committee shall:

(1) Research, develop and publish best practices in implementing this article.

*Model K-12 Threat Assessment Procedures and Guidelines*

- (2) Develop and offer, at no charge to school entities through the Internet or other distance communications systems, all of the following:
  - (i) A model training program for members of teams that may be used and adapted by school entities and team members to meet the requirements of section 1302-E(b)(1).
  - (ii) A model training program for school employees, other than members of teams, that may be used and adapted by school entities to meet the requirements of section 1310-B(1).
  - (iii) Model, age-appropriate informational materials for students that may be used and adapted by school entities to meet the requirements of section 1302-E(a)(2)(iv) and (b)(1)(iv)(A).
  - (iv) Model informational materials for parents and school employees that may be used and adapted by school entities to meet the requirements of section 1302-E(a)(2)(iv) and (b)(1)(iv)(B).
  
- (3) Develop model procedures and guidelines that school entities may use in implementing this article. The model procedures and guidelines shall, at a minimum:
  - (i) Establish standard definitions and terminology.
  - (ii) Reflect best practices in identifying, reporting, assessing and responding to threats, including threats reported through the Safe2Say Program, and coordinating with stakeholders.
  - (iii) Provide for flexibility and local decision-making and recognize the differing levels of available resources in each school entity.
  - (iv) Be posted on the Pennsylvania Commission on Crime and Delinquency's publicly accessible Internet website.
  
- (4) Comply with Federal and State student record confidentiality laws and regulations.
  
- (5) Provide guidance to teams for communications and coordination with student assistance program and individualized education program teams.
  
- (6) Annually review school entity threat assessment reports and use them when developing the requirements under this subsection.
  
- (7) Annually review the training programs, informational materials and model procedures and guidelines and make updates or revisions as necessary.
  
- (8) Notify school entities when the training programs, informational materials, model procedures and guidelines become available or are updated or revised.

## Appendix B: Model Threat Assessment Guidelines<sup>93</sup>



<sup>93</sup> Adapted from Dewey G. Cornell, [Overview of the Virginia Student Threat Assessment Guidelines \(VSTAG\)](#), University of Virginia, June 18, 2018.

## Appendix C: Overview of State Agencies, Programs, and Services

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### PA Commission on Crime and Delinquency

#### Blueprints for Healthy Youth Development

PCCD provides funding to assist communities in developing an extensively researched, data-driven method to select and implement high-quality, evidence-based prevention programs. These initiatives span pre-K through high school, reaching a broad range of ages, and have demonstrated the ability to prevent violence, substance use, delinquency, and trauma.

- **The Incredible Years:** A group-training program for parents and children ages 3-12 that focuses on emotional problems and parental coaching. This Blueprints Program has reduced anti-social behavior in youth by an estimated 54 percent.
- **Promoting Alternative Thinking Strategies:** The objective of this program is to raise emotional and social skills in order to lower aggression in elementary school children (ages 4-11), while expanding learning. The outcome: Sixty percent of children show increased emotional competence, 48 percent show decreased anti-social behavior, and 57 percent show improved concentration and attention.
- **Big Brothers Big Sisters:** This organization's Blueprints program, which matches mentors with at-risk youth, has decreased anti-social behavior 30 percent in the youth they serve, with 33 percent of participants less likely than those in a control group to hit someone.
- **Strengthening Families Program (SFP):** Balancing limits with caring, SFP's initiative for youth ages 10-14 has seen a 56 percent improvement in resisting peer pressure by group members.
- **Life Skills Training—Middle School (LST):** The LST program has resulted in a 50-70 percent reduction in use of alcohol, tobacco, and marijuana use within the study group of middle school-aged children.
- **Project Towards No Drug Abuse (TND):** A drug prevention program for high school youth, Project TND has realized a 74 percent increase in awareness in its groups about the consequences of substance abuse and a 22 percent reduction in marijuana use.
- **Trauma-Focused Cognitive Behavioral Therapy:** TF-CBT is an evidence-based treatment for reducing emotional and behavioral symptoms resulting from trauma exposure; PCCD provides funding to support technical assistance and training for TF-CBT providers through a [partnership](#) with Penn State's EPISCenter.
- **Aggression Replacement Training (ART):** ART is a cognitive behavioral intervention program to help children and adolescents improve social skill competence and moral reasoning, better manage anger, and reduce aggressive behavior. The program specifically targets chronically aggressive children and adolescents between the ages of 12 and 17 years old. PCCD provides funding to support technical assistance and training for ART through a [partnership](#) with Penn State's EPISCenter.

A recent evaluation of these programs implemented with fidelity in Pennsylvania found a positive return on investment for the majority of these programs.<sup>94</sup>

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<sup>94</sup> [Cost-Benefit Analysis for PCCD's Evidence-based Initiatives: Investing in Effective Programs to Improve Lives and Save Tax Payer Dollars](#), PA Commission on Crime and Delinquency in collaboration with the Pew-MacArthur Results First Initiative, May 2019.

### Pennsylvania Youth Survey (PAYS)

Since 1989, the Commonwealth has conducted a survey of school student in the 6<sup>th</sup>, 8<sup>th</sup>, 10<sup>th</sup>, and 12<sup>th</sup> grades to learn about their behavior, attitudes, and knowledge concerning alcohol, tobacco, other drugs, and violence. PCCD sponsors and conducts the PAYS every two years, in partnership with the Departments of Education and Drug and Alcohol Programs, to gather information concerning risk factors, protective factors, and changes in patterns of substance use. The [PAYS Web Tool](#) allows users to view and analyze county and state-level data by categories and variables from the three most recent PAYS administrations (2013, 2015, and 2017). Additional information about PAYS is available on PCCD's [website](#).

### PCCD School Safety and Security Grant Program

[Article XIII-B \(School Safety and Security\)](#) of the PA Public School Code established a School Safety and Security Committee (SSSC) within PCCD. The Committee is tasked with developing the criteria school entities should use in performing school safety and security assessments, issuing a survey to school entities to measure school safety and security preparedness, and administering the School Safety and Security Grants Program. More information about the grants program, including eligibility and application information, is available on [PCCD's School Safety and Security webpage](#).



### **PA Department of Drug and Alcohol Programs**

#### Get Help Now Hotline

Pennsylvanians can call **1-800-662-HELP (4357)** for information about substance use disorder treatment resources. Your call is completely confidential. This hotline, staffed by trained professionals, is available 24 hours a day, seven days a week and is available in both English and Spanish. Not comfortable calling? You can also text 717-216-0905 for assistance.

Additional information about the Get Help Now hotline as well as a **Care Provider Search Tool** are available on [DDAP's website](#).



### **PA Department of Health**

#### School Health

The School Health program serves all children of school age attending public, private, and non-public schools in Pennsylvania and is responsible for providing technical assistance, training, and coordination of programs and services to schools, parents/families, and the community at large regarding school health programs and services.

State law requires certain health services for all children of school age, regardless of the school setting. Those services include physical examinations and health screenings (growth, hearing, scoliosis, TB, and vision) as well as dental health.

As required by the Public School Code, the Department of Health provides reimbursement for state mandated school health services through a state formula for reimbursement. These services include medical, dental, and nursing services.

#### Youth Risk Behavior Surveillance System (YRBSS)

A system developed by the CDC in collaboration with representatives from state and local departments of education and health, other federal agencies, and national education and health organizations. The

YRBSS is designed to monitor priority health risk behaviors that contribute markedly to the leading causes of death, disability, and social problems among youth and adults in the United States, including:

- Behaviors that contribute to unintentional injuries and violence;
- Sexual behaviors related to unintended pregnancy and sexually transmitted diseases, including HIV infection;
- Alcohol and other substance use;
- Tobacco use;
- Unhealthy dietary behaviors; and
- Inadequate physical activity.

The YRBSS includes national, state, territorial, tribal government, and local school-based surveys of representative samples of students in grades 9 through 12. The surveys are conducted every two years, usually during the spring.

### Violence and Injury Prevention

The Violence and Injury Prevention Program (VIPP) aims to prevent death and disability from intentional and unintentional injury by assessing the incidence of injury and developing programs that reduce risk of injury. The goal of these funding initiatives is to focus on policy, environmental and systems changes supplemented with evidence-based individual behavior change, when appropriate, to improve the overall health and safety of our communities. A list of the VIPP focus areas and initiatives is below:

- **Child Abuse and Neglect:** To decrease the prevalence and risk of child abuse and child sexual abuse by implementing [PCAR's Parents in the Know](#) program through the funded county/municipal health departments (CMHDs).
- **Falls Prevention: A Matter of Balance (MOB):** Managing Concerns about Falls program. Currently, we partner with eight CMHDs Allegheny, Allentown, Bethlehem, Chester, Erie, Montgomery, Wilkes-Barre and York and three regional tobacco primary contractors in North Central, Northeast, and Northwest regions to implement MOB.
- **Motor Vehicle Safety:** Based upon the communities needs the funded CMHDs chose to focus on teenage and/or mature drivers and some also provide car seat distribution and education on the latest child restraint policy.
- **Traumatic Brain Injury:** Funded CMHDs promote [Concussion Wise Pennsylvania](#) education course and promote [BrainSTEPS](#) and Concussion Management Teams in their schools and communities.
- **American Trauma Society (ATS), Pennsylvania Division:** ATS is a non-profit, statewide organization dedicated to reducing serious injuries and deaths through trauma prevention education. Programs have been developed for different ages, from pre-school children through the elderly. Examples of special initiatives are: bike derbies, helmet distribution, farm safety, falls prevention, and Stop the Bleed.
- **Pennsylvania SAFE KIDS Coalition:** Working in partnership with its local affiliates, SAFE KIDS PA seeks to reduce unintentional injuries and death to children by concerted community action, including promoting public awareness of unintentional childhood injury prevention programs and facilitating public awareness of, and appreciation for, the safety measures necessary to protect children. SAFE KIDS PA provides technical assistance through coalition development, conferences, webinar sessions and collaboration with other agencies.



## PA Department of Human Services, Office of Mental Health and Substance Abuse Services

### School-Based Violence Prevention

OMHSAS has supported [Youth Mental Health First Aid](#) and [Question-Persuade-Refer \(QPR\)](#) trainings across the commonwealth through both the [Garrett Lee Smith \(GLS\) Youth Suicide Prevention Grant](#) and the [System of Care Partnership](#). Additional trainings on suicide risk assessment, safety planning, postvention, and family engagement have also been offered to schools through the GLS grant. Staff have also provided consultation for schools on policy development, as well as the selection of staff and student education and training programs.

### Crisis Resources for Youth

OMHSAS recently announced a new partnership with Crisis Text Line, a free and confidential service that is available nationally to provide support to those in crisis. Crisis Text Line may be accessed any time by texting “PA” to 741-741.

### Pennsylvania Community of Practice (CoP) on School-Based Behavioral Health

This community of cross-sector stakeholders shared a commitment to the advancement of early childhood, school-age, and adult behavioral health and wellness, and is spearheaded by the PA Technical Assistance and Training Network (PaTTAN). The CoP’s goal is to support schools’ efforts to overcome non-academic barriers to learning for children and youth so they can successfully transition to adulthood. A primary area of focus is on the scale-up of Positive Behavior Interventions and Supports (PBIS) across the commonwealth.



## PA Department of Education (PDE)

### PDE Office for Safe Schools

The Office for Safe Schools coordinates school safety and security programs, collection of annual school crime and violence statistics, coordination of antiviolence efforts, and the development of policies and strategies to combat school violence. The Office supports and provides technical assistance and professional development programs in a variety of areas, including crisis intervention, school police training, violence prevention, and social-emotional wellness and safety, and provides services to all school entities across Pennsylvania.

### Pennsylvania Student Assistance Program (SAP)

The [Pennsylvania Student Assistance Program \(SAP\)](#) is a systematic team process used to mobilize school resources to remove barriers to learning. SAP is designed to assist in identifying issues including alcohol, tobacco, other drugs, and mental health issues which pose a barrier to a student’s success. The primary goal of the Student Assistance Program is to help students overcome these barriers so that they may achieve, advance, and remain in school. While Student Assistance Programs exist in other areas of the country, the structure and operation of the program in Pennsylvania is a unique expression of an integrated model serving the needs of Pennsylvania families and students.

### PDE Safe Schools Targeted Grants Program

PDE’s Office for Safe Schools provides grant funding opportunities through the Safe Schools Targeted Grants Program. Competitive funding is available for eligible school entities to support costs associated with equipment, programs, as well as the hiring of School Police Officers and School Resource Officers. Additional information is available on [PDE’s Safe Schools Targeted Grants webpage](#).



### Initiatives to Promote Positive School Climate and Social-Emotional Learning

Recognizing the importance of a positive school climate to promote academic achievement and success, PDE has implemented several initiatives to ensure all students feel safe, respected, and valued in school.

- The Department has embedded culturally responsive and trauma informed concepts and competencies within professional development programs and resources available for educators throughout the commonwealth.
- In collaboration with state and local partners, Pennsylvania has worked to expand access to school-based behavioral and mental health services, which can leverage the Multi-Tiered Systems of Support (MTSS) framework and Schoolwide Positive Behavior Interventions and Supports (SWPBIS) approach.
- The Office for Safe Schools has tools and resources, including a no-cost, customizable PA School Climate Survey, to help schools measure and improve student engagement, safety, and school climate.
- In 2016, PDE launched the PA School Climate Leadership Initiative, in partnership with the PA Association of Intermediate Units (PAIU) and the National School Climate Center (NSCC). Participating schools receive training and technical assistance from a designated School Climate Regional Coordinator housed at 27 of the commonwealth's 29 Intermediate Units.
- The [PA Equity and Inclusion Toolkit](#), developed in collaboration with other state agencies, organizations, and partners, focuses on strategies and actions that schools can take to address bias and discrimination in a proactive and effective manner.
- Pennsylvania is one of eight states participating in the Collaborating States Initiative, led by the [Collaborative for Academic, Social, and Emotional Learning \(CASEL\)](#). Through this work, Pennsylvania has developed a roadmap for schools and districts looking to embed social-emotional competencies within their curriculum, instruction, professional development, and school climate initiatives.
- Additional resources related to social-emotional learning are available for educators and administrators through Pennsylvania's [Standards Aligned System \(SAS\) Portal](#).
- The PA Career Ready Skills (PA CRS) project provides educators with resources to support the implementation of Pennsylvania Career Ready Skills in the school environment. Aligned to Pennsylvania's Career Education and Work (CEW) Standards, PA CRS focuses on essential skills like self-awareness and self-management, establishing and maintaining relationships, and social problem-solving skills.
- Pennsylvania identified addressing the needs of students through school-based supports and community partnerships, including through the Community Schools Framework, as a state priority for federal Title IV, Part A funding in its [ESSA Consolidated State Plan](#). PDE can provide guidance and technical assistance to school entities and communities to help identify ways federal and state resources can be leveraged to improve supports and services for students and families.



### **PA Emergency Management Agency (PEMA)**

#### All-Hazards School Safety Planning Toolkit

This [Toolkit](#) from the Pennsylvania Emergency Management Agency (PEMA) provides guidelines and information for schools, local education agencies, and communities to address a variety of crises and emergency situations that might impact their campuses.

## Appendix D: Additional Resources for School Entities

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### Threat Assessment

- **[The National Threat Assessment Center \(NTAC\)](#)**: Provides links to best practices in threat assessment and the prevention of targeted violence, including resources on conducting threat assessment in K-12 schools, building positive school climates, and requesting information/training from NTAC personnel. This includes reports such as [Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence](#) (2018) and [Protecting America's Schools: A U.S. Secret Service Analysis of Targeted School Violence](#) (2019).
- **[Making Prevention a Reality: Identifying, Assessing, and Managing the Threat of Targeted Attacks](#)** – The U.S. Department of Justice, Federal Bureau of Investigation, Behavioral Analysis Unit – National Center for the Analysis of Violent Crime recently published this report/guide on assessing and managing the threat of targeted violence.
- **[National Association of School Psychologists \(NASP\)](#)**: Provides information and links to resources and research related conducting threat assessment in K-12 schools as part of systems-level prevention efforts.
- **[National Behavioral Intervention Team Association \(NaBITA\)](#)**: Provides education, resources, and supports to K-12 and campus behavioral intervention teams.
- **[Readiness and Emergency Management for Schools \(REMS\) Technical Assistance Center](#)**: National clearinghouse developed by the U.S. Department of Education for school safety information, including training, resources, and information related to violence prevention, response, and recovery, including threat assessment. Examples of resources include “Forming a School Behavioral Threat Assessment Team” [webinar](#) (2016), XX
- **[Virginia Student Threat Assessment Guidelines \(University of Virginia\)](#)**: Provides guidelines and resources for schools to conduct threat assessments, including links to research on threat assessment.

### School Safety and Violence Prevention

- **[Center for Safe Schools](#)**: Pennsylvania-based organization provides training on a variety of school safety and youth violence prevention topics.
- **[Center for Schools and Communities](#)**: The Center for Schools and Communities is committed to improving outcomes for children and families through prevention and intervention initiatives. Staff possess diverse backgrounds in education, human services, community development, and law, as well as specialized services in program development and design, evaluation, training, and resource development.
- **[Center for the Study and Prevention of Violence \(University of Colorado\)](#)**: Conducts research and provides support related to implementing evidence-based programs that promote positive youth development, reduce problem behaviors, and prevent violence and other antisocial behaviors.
- **[Evidence-Based Prevention & Intervention Support Center \(EPISCenter\) \(Pennsylvania State University\)](#)**: A collaborative partnership supporting the dissemination, quality implementation, sustainability, and impact assessment of a menu of proven-effective prevention and intervention programs.

- [Final Report of the Federal Commission on School Safety](#): A report of findings and recommendations published in 2018 by the Federal Commission on School Safety, established to research and recommend solutions to advance school safety. The Federal Commission was co-chaired by leaders of the U.S. Department of Education, U.S. Department of Homeland Security, U.S. Department of Health and Human Services, and U.S. Department of Justice.
- [International Association of Chiefs of Police, Youth Focused Policing \(YFP\)](#): Provides information, resources, and training to help law enforcement work and intervene with children, teens, and young adults.
- [Keep Kids Safe PA](#) – Provides information and resources for parents, educators, and youth-serving professionals on Pennsylvania’s mandated reporting laws and how to report suspected abuse through ChildLine (1-800-932-0313).
- [Model Trauma-Informed Approach Plan](#) – Pursuant to Act 18 of 2019, PCCD’s School Safety and Security Committee adopted a Model Trauma-Informed Approach Plan in August 2019. The Model Plan was designed for school entities seeking funding through the [School Safety and Security Grant Program](#), as well as to provide relevant, evidence-based resources and information for school entities to use as they work to develop and enhance trauma-informed communities.
- [National Association of School Resource Officers \(NASRO\)](#): Provides training, information, and resources to school-based law enforcement officers.
- [National Center on Safe Supportive Learning Environments](#) – Part of the U.S. Department of Education, the National Center on Safe Supportive Learning Environments offers information, technical assistance, and resources to states, districts, schools, institutions of higher education, and communities focused on improving student supports and academic enrichment.
- [PA Network for Student Assistance Services \(PNSAS\)](#) – Provides information, assistance, and support related to SAP for Pennsylvania school entities.
- [PA Positive Behavior Interventions and Supports \(PBIS\)](#) – Pennsylvania has supported the implementation and scale-up of PBIS efforts through a cross-system PA Positive Behavior Support (PaPBS) Network.
- [PDE Office for Safe Schools](#) – Coordinates school safety and security programs across the Commonwealth, and provides technical assistance, professional development programs, and funding to support school safety in a variety of areas, including crisis intervention, school police training, violence prevention, social/emotional wellness, and safety. The Office also provides the online [PA School Climate Survey](#) at no cost for school entities across the Commonwealth.
- [Pennsylvania Training and Technical Assistance Network \(PaTTAN\)](#) – Working with PDE’s Bureau of Special Education, PaTTAN provides a full array of professional development and technical assistance targeted to improving student results, including efforts focused on MTSS/PBIS and culturally responsive practices.
- [Pennsylvania Youth Survey \(PAYS\)](#) – PAYS provides schools with the ability to measure a variety of risk and protective factors for students enrolled in grades 6, 8, 10, and 12, including behavior, attitudes, and knowledge concerning alcohol, tobacco, other drugs, and violence. The survey is sponsored and conducted every two years by PCCD to help schools and communities direct prevention resources to areas where they are likely to have the greatest impact.
- [Safe and Supportive Schools – Standards Aligned System \(SAS\) Portal](#) – Maintained by PDE, the SAS Portal provides relevant resources for educators in key domains, including school climate and social emotional learning.

## Emergency Management and Response to School Violence

- **[Readiness and Emergency Management for Schools \(REMS\) Technical Assistance Center:](#)** National clearinghouse developed by the U.S. Department of Education for school safety information, including training, resources, and information related to violence prevention, response, and recovery. This includes the [Guide for Developing High-Quality School Emergency Operations Plans](#), among other resources.
- **[IACP Prevention and Response to School Violence:](#)** Provides trainings, tools, and resources to help law enforcement and community stakeholders prevent, prepare for, respond to, and recover from incidents of school violence.
- **Relevant Pennsylvania Statutes, Regulations, and Guidance:** By law, each school district must have a ***comprehensive disaster response and emergency preparedness plan*** (35 Pa. C.S.A. § 7701), commonly referred to as an “all hazards plan,” which must be developed in cooperation with the local emergency management agency and the PA Emergency Management Agency (PEMA) and in accordance with law and regulations ([22 Pa. Code § 10.24](#)).
  - Under Act 44 of 2018, the plan must also be reviewed annually by the School Safety and Security Coordinator and/or School Administrator and filed with or submitted to the local emergency management agency as well as to each police department that has jurisdiction over the school, county communications or dispatch and each local fire department.
- **Emergency Response/First Responder Training:** Tiered response training can be conducted in schools by first responders with the participation of teachers, staff, and students.
  - Tier 1 includes response to intruder situations;
  - Tier 2 is triage and treating the wounded; and
  - Tier 3 includes interviews and reuniting people.
- **Additional Emergency Management Training:** School officials can also take an ***incident command class***, such as the [National Incident Management System \(NIMS\)](#) training, to provide for universal language during response to an emergency.

## Confidentiality, Privacy and Consent

- **[Family Educational Rights and Privacy Act \(FERPA\)](#)** (20 U.S.C. § 1232g; 34 CFR Part 99) – U.S. Department of Education Family Policy Compliance Office webpage providing information and resources related to FERPA, including exceptions for schools to disclose student education records, such as those related to health and safety emergencies. See [Balancing Student Privacy and School Safety: A Guide to the Family Educational Rights and Privacy Act for Elementary and Secondary Schools](#), U.S. Department of Education, October 2007.
- **Relevant Pennsylvania Statutes, Regulations, and Guidance:**
  - [Sworn Statement Prior to Admission](#) (24 P.S. §13-1304-A) – Requires a sworn statement or affirmation indicating whether a student was previously or is presently suspended or expelled for an act or offense involving weapons, alcohol or drugs, or violence.
  - [Chapter 12 – Students and Student Services](#) (22 Pa. Code Chapter 12, [Section 12.12 Confidential Communications](#); [Section 12.41 Student Services](#))
  - [Enrollment of Students](#) (24 P.S. §13-1301-§13-1306) – PDE Basic Education Circular, provides guidance regarding public school enrollment procedures, including required enrollment documentation and a description of items that may be requested but not as a condition of enrollment, such as health records, academic records, discipline records, IEP and other special education records, etc.
    - **Related:** [Student Enrollment FAQ](#) (24 P.S. § 13-1301-§13-1306)

*Model K-12 Threat Assessment Procedures and Guidelines*

- [Protection of Pupil Rights](#) (20 U.S.C. §1232h) – PDE Basic Education Circular outlining students’ rights related to programs, surveys, analyses, or other evaluations conducted by school entities.
- [Student Records Being Retained by a Private School](#) (22 Pa. Code §12.31) – PDE Basic Education Circular providing guidance regarding the practice of a private school temporarily retaining a student’s records, pending resolution of an infraction of the private school’s policies or a contractual dispute with a parent or guardian.
- [Transfer of Records](#) (24 P.S. §19-1926) – PDE Basic Education Circular providing information regarding responsibility of school entities to transfer education records to educational programs in state correctional institutions.
- [Student Health Records](#) (24 P.S. § 14-1409) – Article 14 of the PA School Code contains a provision that addresses confidentiality, transference, and removal of health records.
- [Confidentiality and Student Health Information](#) – PA Department of Health webpage outlining state and federal privacy protections for student health information, including Health Insurance Portability and Accountability Act (HIPAA).