

**BEHAVIORAL THREAT ASSESSMENT (BTA) POLICY**

THE SCHOOL BOARD OF BROWARD COUNTY (SBBC), FLORIDA IS COMMITTED TO PROTECTING ITS STUDENTS, EMPLOYEES, AND MEMBERS OF THE COMMUNITY. IT IS ESSENTIAL THAT DISTRICTWIDE VIOLENCE PREVENTION BE IN PLACE TO FOSTER A LEARNING ENVIRONMENT THAT PROMOTES A CULTURE OF SAFETY, RESPECT, TRUST, AND SOCIAL/EMOTIONAL SUPPORT, WHILE ALSO PROTECTING STUDENTS AND STAFF FROM CONDUCT THAT POSES AN ACTUAL OR PERCEIVED THREAT TO SELF OR OTHERS. THE **BEHAVIORAL THREAT ASSESSMENT (BTA)** POLICY SHALL BE INTERPRETED AND APPLIED CONSISTENTLY WITH ALL APPLICABLE STATE AND FEDERAL LAWS, AND THE BOARD'S COLLECTIVE-BARGAINING AGREEMENTS. THE POLICY WAS DEVELOPED IN ACCORDANCE WITH THE LEGISLATION ENACTED BY THE STATE OF FLORIDA (MARJORY STONEMAN DOUGLAS HIGH SCHOOL PUBLIC SAFETY ACT, SB 7026), ESTABLISHED RESEARCH, AND RECOGNIZED STANDARDS OF PRACTICE REGARDING THREAT ASSESSMENT AND MANAGEMENT IN SCHOOL SETTINGS. **THE OUTCOME OF A BTA IS NOT USED AS A PRIMARY DETERMINATION OF A DISCIPLINE CONSEQUENCE FOR A STUDENT.**

**SECTION I: DEFINITIONS**

- A. A **threat** is communication or behavior that indicates that 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.
  - a. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means.
  - b. The communication and/or behavior is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat; observed by or communicated to a third party, and regardless of whether the target of the threat is aware of the threat.
- B. A **behavioral threat assessment** is a systematic process that is designed to identify situations/persons of concern, investigate and gather information, and assess and manage the situation in order to mitigate risk.
- C. An **aberrant behavior** is that which is atypical for the person or situation and causes concern for the safety or well-being of those involved. Aberrant behavior for an individual involves actions, statements, communications or responses that are unusual for the person or situation; or actions which could lead to violence toward self or others; or are reasonably perceived as threatening or causing concern for the well-being of the person. These can include (but are not limited to):
  - a. Unusual social distancing or isolation of subjects from peers and family members;

- b. Sullen or depressed behavior from an otherwise friendly and positive person;
  - c. Out of context outbursts of verbal or physical aggression;
  - d. Increased levels of agitation, frustration and anger;
  - e. Confrontational, accusatory, or blaming behavior;
  - f. An unusual interest in or fascination with weapons; and/or
  - g. Fixation on violence as means of addressing a grievance.
- D. An **imminent threat** exists when the person's behavior/situation poses 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 behavior that requires intervention.
- E. **Substantive threats** are behaviors or statements that represent a risk of harm to others. They are characterized by qualities that reflect serious intent (such as planning and preparation, recruitment of accomplices, and acquisition of a weapon) or the intent is not clear.
- F. **Transient threats** include all threats that do not reflect a genuine intent to harm. They are often made in the heat of the moment and may be an expression of humor, rhetoric, anger, or frustration that can be easily resolved with an apology, retraction, or explanation by the person who made the threat. Transient threats can be provocative and disruptive, but from a threat assessment perspective, they do not reflect a real intent to harm others.
- G. An **unfounded/no threat** decision exists when, following a detailed account of the threat obtained by interviewing the person who made the threat, the intended victim, and other witnesses, a threat could not be corroborated or substantiated. It may also exist when the determination is made, based on the circumstances and the student's intentions, that there is no evidence of communication or behavior suggesting an intent to harm.
- H. A **behavioral threat assessment team** shall include, pursuant to Florida statute, persons with expertise in counseling, instruction, school administration, principal, when available, and law enforcement. Persons with expertise in counseling include school counselors, school psychologists, school social workers, and family counselors. Additional personnel with knowledge of the child or circumstances may also serve as members of the team.

## **SECTION II: PURPOSE**

- A. The primary purpose of the BTA is to determine whether an individual poses a threat, to mitigate risks, and ensure safety. Its purpose is not to determine disciplinary intervention. However, information obtained through the BTA process may be used to inform disciplinary intervention.
- B. Each school principal shall identify a school-based ~~threat assessment~~ **BTA** team with the mandatory team members and alternate team members before students report to school each year.
- C. All school-based administrators and ~~threat assessment~~ **BTA** team members must attend and complete mandatory district threat assessment trainings annually

- D. All threats of violence or physical harm to self or others shall be taken seriously, since the primary goal of threat assessment is the safety of all persons involved.
- E. School-based ~~threat assessment~~ BTA teams shall adhere to the rules and responsibilities within this policy with fidelity.

**Section III: DISTRICT/SCHOOL ROLES AND RESPONSIBILITIES**

- A. The Chief of Safety & Security Officer, and Emergency Preparedness (Chief) shall ensure compliance with this policy.
- B. Each school principal shall identify members of a ~~threat assessment~~ BTA team that includes persons with expertise in counseling, instruction, school administration, and law enforcement. Members will be trained on the roles and responsibilities of each team member.
- C. All school-based administrators and ~~threat assessment~~ BTA team members must attend and complete mandatory district threat assessment trainings annually. Each mandatory team member shall report their completion of this requirement to their supervisor.
- D. The BTA team at each school must provide annual training and guidance to students, staff, and parents on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and the various options for submitting a report, including anonymous reporting.
- E. Each school principal must assign school-based staff members who can proactively monitor and respond to all incoming reports where safety is of concern.
- F. All SBBC employees, volunteers, and contractors are required to report to school administration any expressed threat(s) or behavior(s) that may represent a threat to the community, school, or self. Threats that are not easily recognized as harmless should be reported to the school administrator or other team members.
- G. ~~F.~~ Each ~~threat assessment~~ BTA team must respond, within 24 hours when school is in session, to any report of a threat or any patterns of behavior that may pose a threat to self or others. If school is not in session, and the school principal becomes aware of a threat or a pattern of behavior by a student that may pose a threat to self or others, he/she must immediately shall refer the matter to law enforcement for evaluation, and the threat assessment team must meet no later than the end of the first day school is back in session to consider the matter and ensure it is resolved. ~~The team shall gather information regarding the specifics of the threat and/or behaviors that may pose a threat, including but not limited to: details of the incident or threat, witness statements, and relevant artifacts.~~

**PLEASE NOTE, THE FOLLOWING BULLETS HAVE BEEN REORGANIZED INTO THE TWO SECTIONS ADDED BELOW:**

- G. ~~When assessing a potential threat or concerning behavior, the threat assessment team must determine not only whether a threat has been made or communicated, but also if a person poses a danger to self or others or if they are potentially on a pathway to violence.~~

- a. ~~For students deemed a threat to self, the threat assessment team must ensure the student's immediate safety, then refer the student to the school-based suicide designee. The suicide designee will meet with the student and assess the severity of the risk following the Suicide Prevention Handbook guidelines.~~
  - b. ~~If the threat assessment team determines that a student poses a threat to others, the team is responsible for assessing the level of threat by conducting student/parent interviews, reviewing all pertinent records, and following the district's threat assessment procedures.~~
  - c. ~~The threat assessment team must coordinate resources to provide intervention to individuals whose behavior may pose a threat to the safety of school staff or students consistent with the model policies developed by the Office of Safe Schools.~~
  - d. ~~The threat assessment team must plan for the implementation and monitoring of appropriate interventions in order to manage or mitigate the student's risk for engaging in violence and increasing the likelihood of positive outcomes.~~
  - e. ~~Interventions should remain in place until the team assesses that the student is no longer in need of supports and does not pose a threat to self or others.~~
- H. ~~Threat assessment teams shall follow established procedures for referrals to school-based, community, and/or health care providers for mental health services, evaluation, or treatment.~~
- I. ~~All threat assessment outcomes and recommendations must be reported to the school principal. The school principal will review the documentation for all threat assessments to ensure completeness and fidelity. The school principal will sign/acknowledge that the threat assessment documentation is complete and will forward the signed/acknowledged assessment to their supervisor. In addition, upon a preliminary determination that a student poses a threat of violence or physical harm to self or others, the threat assessment team must immediately report its determination to school principal or his/her administrative designee. The principal or his/her administrative designee shall immediately attempt to notify the student's parent or legal guardian.~~
- a. ~~Nothing in this policy shall preclude school personnel from acting immediately to address an imminent threat. Where an immediate threat to life or physical safety exists, reports must result in an immediate notification to law enforcement.~~
  - b. ~~Nothing in this policy shall preclude the threat assessment team from notifying the school principal, his/her administrative designee, or the Chief of any individual (other than a student) who poses a threat of violence or physical harm to self or others.~~
- J. ~~If an immediate mental health or substance abuse crisis is suspected, school personnel shall follow policies to engage behavioral health crisis resources, including, but not limited to, mobile crisis teams and school resource officers, who~~

- ~~have been trained in crisis intervention. These individuals shall provide emergency intervention and assessment, make recommendations, and refer the student for appropriate services. Threat assessment teams shall contact other agencies involved with the student and any known service providers to share information and coordinate necessary follow up. Any information from education records disclosed during this process shall be done in accordance with The Family Educational Rights and Privacy Act (FERPA) (34 CFR 99.31(10), 99.36).~~
- ~~K. The threat assessment team shall identify members of the school community to whom threatening behavior should be reported and provide guidance to students, faculty, and staff regarding recognition of threatening or aberrant behavior that may represent a threat to the community, school, or self.~~
- ~~L. All SBBC employees, volunteers, and contractors are required to report to school administration any expressed threat(s) or behavior(s) that may represent a threat to the community, school, or self.~~
- ~~M. Regardless of threat assessment activities, disciplinary action and referral to law enforcement are to occur as required by law and school board policies.~~
- ~~N. Upon a preliminary determination by the threat assessment team that an individual poses a threat, members of the threat assessment team may request and obtain criminal history record information~~
- ~~a. No member of a threat assessment team shall re-disclose any criminal history record information or health information obtained or use any record of an individual beyond the purpose for which such disclosure was made to the threat assessment team.~~
- ~~b. The threat assessment team may **not** maintain the criminal history record or place it in the student's educational file.~~
- ~~O. The threat assessment team must consult with law enforcement when a student exhibits a pattern of behavior, based upon previous acts, or the severity of an act, that would pose a threat to school safety.~~
- ~~P. If a student commits more than one misdemeanor, that is known to the school, the threat assessment team must consult with law enforcement to determine if further action is warranted. **Note: (Removed from legislation and stricken entirely from policy.)**~~
- ~~Q. If a student is facing possible expulsion or suspension as a consequence of certain actions, the school should consider ways in which these can be safely enacted and identify resources that may assist the student during this time. In addition, a threat assessment team may use alternatives to expulsion or referral to law enforcement agencies unless the use of such alternatives will pose a threat to school safety.~~
- ~~R. Threat assessment records are considered education records and shall be maintained and released in accordance with FERPA and state statute. The threat assessment, its determination, along with any interventions provided, will be recorded in the appropriate electronic data systems by the threat assessment team. Additionally, these records will be transferred pursuant to school board policy 5100.2.~~
- ~~S. The Chief Auditor will conduct annual audits, in compliance with this policy, and report findings to the Audit Committee and The School Board.~~

## SECTION IV: BTA TEAM RESPONSES

- A. When assessing a potential threat or concerning behavior, ~~the threat assessment team must determine not only whether a threat has been made or communicated, but also if a person poses a danger to self or others or if they are potentially on a pathway to violence.~~ an administrator and another school-based BTA team member must evaluate the threat by obtaining a detailed account of the threat, usually by interviewing the person who made the threat, the intended victim, and other witnesses. The initial key question is whether there is a communication or behavior that suggests an intent to harm someone.
- a. If the answer is **no**, the administrator and the previously selected BTA team members will proceed to complete the required portions of the BTA process. However, even if there is no intent to harm, statements or behaviors may still merit attention, intervention, or services, which can be determined by the BTA Team or the appropriate school-based team (e.g., Collaborative Problem-Solving (CPS) Team, Individualized Education Plan (IEP) team, etc.)
  - b. For students deemed a threat to self, the ~~threat assessment~~ BTA team members must ensure the student's immediate safety, then refer the student to the school-based suicide prevention designee. The suicide prevention designee will meet with the student and assess the severity of the risk following the Suicide Prevention Handbook guidelines.
  - c. If the answer is **yes**, and the preliminary determination by the ~~threat assessment~~ BTA team determines that a student poses a threat to others, the team is responsible for assessing the level of threat by conducting student/parent interviews, reviewing all pertinent records, and following the district's threat assessment procedures.
- B. Upon a determination by the BTA team members that a student poses a threat, as designated by the Superintendent, ~~all threat assessment BTA outcomes and recommendations~~ threat determinations must be reported to the school principal or his/her administrative designee, as well as the principal's supervisor.
- C. Upon a determination by the BTA team members that a student poses a threat, as designated by the Superintendent, the principal or his/her administrative designee participating in the BTA, shall immediately attempt to notify the student's parent or legal guardian.
- D. Upon a ~~preliminary~~ preliminary determination by the ~~threat assessment~~ BTA team members that an individual poses a threat, authorized members of the ~~threat assessment~~ BTA team may request and obtain criminal history record information, pursuant to s.985.04(1).
- a. No member of a ~~threat assessment~~ BTA team shall re-disclose any criminal history record information or health information obtained or use any record of an individual beyond the purpose for which such disclosure was made to the threat assessment team.

- b. The ~~threat assessment~~ **BTA** team may *not* maintain the criminal history record or place it in the student's educational file.
  - c. The ~~threat assessment~~ **BTA** team must consult with law enforcement when a student exhibits a pattern of behavior, based upon previous acts, or the severity of an act, that would pose a threat to school safety.
- E. The ~~threat assessment~~ **BTA** team must coordinate resources to provide intervention to individuals whose behavior may pose a threat to the safety of school staff or students consistent with the model policies developed by the Office of Safe Schools.
- a. The ~~threat assessment~~ **BTA** team must plan for the implementation and monitoring of appropriate interventions in order to manage or mitigate the student's risk for engaging in violence and increasing the likelihood of positive outcomes.
  - b. Interventions should remain in place until the **BTA** team assesses that the student is no longer in need of supports and does not pose a threat to self or others.

## **SECTION V: FOLLOW-UP AND INTERVENTIONS**

- A. ~~Threat assessment~~ **BTA** teams shall follow established procedures for referrals to school-based, community, and/or health care providers for mental health services, evaluation, or treatment.
- B. The school principal will review the documentation for all threat assessments to ensure completeness and fidelity. The school principal will sign/acknowledge that the ~~threat assessment~~ **BTA** documentation is complete and will forward the signed/acknowledged assessment to their supervisor. ~~In addition, upon a preliminary determination that a student poses a threat of violence or physical harm to self or others, the threat assessment team must immediately report its determination to school principal or his/her administrative designee.~~
- a. Nothing in this policy shall preclude school personnel from acting immediately to address an imminent threat. Where an immediate threat to life or physical safety exists, reports must result in an immediate notification to law enforcement.
  - b. Nothing in this policy shall preclude the ~~threat assessment~~ **BTA** team or **any school staff member** from notifying the school principal, his/her administrative designee, or the Chief of any individual (other than a student) who poses a threat of violence or physical harm to self or others.
- C. If an immediate mental health or substance abuse crisis is suspected, school personnel ~~shall~~ must follow policies to engage behavioral health crisis resources, including, but not limited to, mobile crisis teams and school resource officers, who have been trained in crisis intervention. These individuals shall provide emergency intervention and assessment, make recommendations, and refer the student for appropriate services. ~~Threat assessment~~ **BTA** teams shall contact other agencies involved with the student and any known service providers to

share information and coordinate necessary follow up. Any information from education records disclosed during this process shall be done in accordance with The Family Educational Rights and Privacy Act (FERPA) (34 CFR §99.31(10), §99.36).

- D. The ~~threat assessment~~ BTA team shall identify additional members of the school community to whom threatening behavior should be reported and provide guidance to students, faculty, and staff regarding recognition of threatening or aberrant behavior that may represent a threat to the community, school, or self.
- E. ~~Threat assessment~~ BTA records are considered education records and shall be maintained and released in accordance with FERPA and state statute. The BTA process is a substantive decision-making process and therefore is not subject to the amendment process as described in School Board Policy 5100.1(V). The BTA, its determination, along with any interventions provided, will be recorded in the appropriate electronic data systems by the threat assessment team. Additionally, these records will be transferred pursuant to ~~s~~School ~~b~~Board ~~p~~Policy 5100.2.
  - a. Upon the student's transfer to a different school, within the district, the threat assessment team shall verify that any intervention services provided to the student remain in place until the threat assessment team of the receiving school independently determines the need for intervention services. The receiving school-based administrator will receive an alert and must follow up with the intervention implementation within 72 hours. F.S. §1003.25 requires the records to be transferred to include verified reports of serious recurrent behavior patterns, including BTA and interventions, psychological evaluations, therapeutic treatment plans and therapy and progress notes created by school.
  - b. Upon notification of the student's transfer to an out-of-district school, the BTA team will confirm that intervention services remain available, as applicable, until the BTA team of the receiving school independently determines the need for intervention services. Transfer of student records will occur upon request from another district or parent/guardian.
- F. In addition to the ~~Regardless of threat assessment~~ BTA activities, disciplinary action and referral to law enforcement are to occur as required by law and school board policies.
  - a. If a student is facing possible expulsion or suspension as a consequence of certain actions, the school should consider ways in which these can be safely enacted and identify resources that may assist the student during this time. In addition, ~~a threat assessment team may use~~ alternatives to expulsion or referral to law enforcement agencies may be used, unless the use of such alternatives will pose a threat to school safety.
- G. The Chief Auditor will conduct annual audits, in compliance with this policy, and report findings to the Audit Committee and The School Board.

Policy Custodian: Office of Academics

Authority: F.S. §1006.07(7); F.S. §1006.13; F.S. §1003.25

History: Adopted: 3/5/2019, Revised: TBD