

Threat Assessments

Effective school safety strategies are generally divided between prevention and harm mitigation measures.

Harm mitigation involves minimizing the harm once the act has occurred and includes, site hardening, effective drills to help students evacuate to safety, single access points, hard corners, locked doors, fenced campuses, etc.

Prevention seeks to ensure that harm mitigation strategies do not have to be used because we have prevented the act from occurring altogether, which is the overarching goal of all school safety efforts.

Threat management is the best opportunity to prevent the next school attack.

In order to begin the threat management process, we have to learn of concerning statements, actions, behaviors, etc. of an individual.

One of the concerns and criticisms expressed about the MSD shooter is that people who had relevant actionable information did not report their concerns.

Our investigation showed many people saw indicators of the pathway to violence that they kept to themselves until after the shooting.

This is consistent with concerns raised in general about the lack of reporting in other mass casualty events.

Post-MSD in Florida people are reporting more.

We are getting information through the various reporting media, including FortifyFL and the other anonymous reporting platforms.

Once that information is received it has to be analyzed and that is where the threat assessment teams and threat assessment process comes in.

Threat assessments are the first step in the *threat management* process.

Another criticism regarding the MSD shooter, and other assailants in other incidents, has been that the “dots were not been connected.”

Threat assessment teams are the opportunity to “connect the dots” and the *threat management* is the opportunity to then take the “dots” and do something to prevent harm.

Threat assessment teams have been required in every Florida school since March 2018 when then-Governor Rick Scott signed SB7026 into law.

Florida law sets forth the minimum participants on a threat assessment team.

Florida law requires that all school-based threat assessment teams use the 'Comprehensive School Threat Assessment Guidelines' (CSTAG) threat assessment instrument.

A common threat assessment instrument is used in Florida schools, but not a common threat assessment process and there is no common reporting system.

The Commission has previously recommended that there be a common statewide reporting platform because information is not currently shared between and among districts, and in some cases within districts because they are still using “pen and paper” files.

The threat assessment workgroup required by SB7030 also recommend a common statewide reporting system.

A recent survey of Florida school districts shows inconsistency and disparity in threat assessment reporting platforms.

Eighteen districts have a dedicated software system provided by four different vendors. Two districts have developed their own proprietary systems. Twenty-one districts are using some aspect of their student information system, nine districts are using “pen and paper”, and 14 districts are using Excel, Google Docs, or other similar software (five districts did not respond).

There is also no requirement of *threat management* after the *threat assessment*. If the threat assessment determines that the allegations are not actionable through an arrest, Baker Act, etc. then there may or may not be further monitoring or follow-up depending on the district.

The level of coordination between school threat assessment teams and law enforcement outside the school is also inconsistent.

Threat assessment without threat management is a halfway to the finish line and school-based threat assessment without community-based law enforcement coordination leaves the circle half open.

If the goal is truly to disrupt the pathway to violence and prevent an attack, then we should not wait for an individual to actually commit a crime or be in mental health crisis before reacting.

There is no common oversight model of the school threat assessment teams or process in Florida. Some districts have dedicated threat assessment trainers and an administrator and others leave it to the teams to act independently.

Some districts review the threat assessment teams' findings weekly, some monthly, and some not at all.

Some districts have deadlines to complete the threat assessment process and others do not.

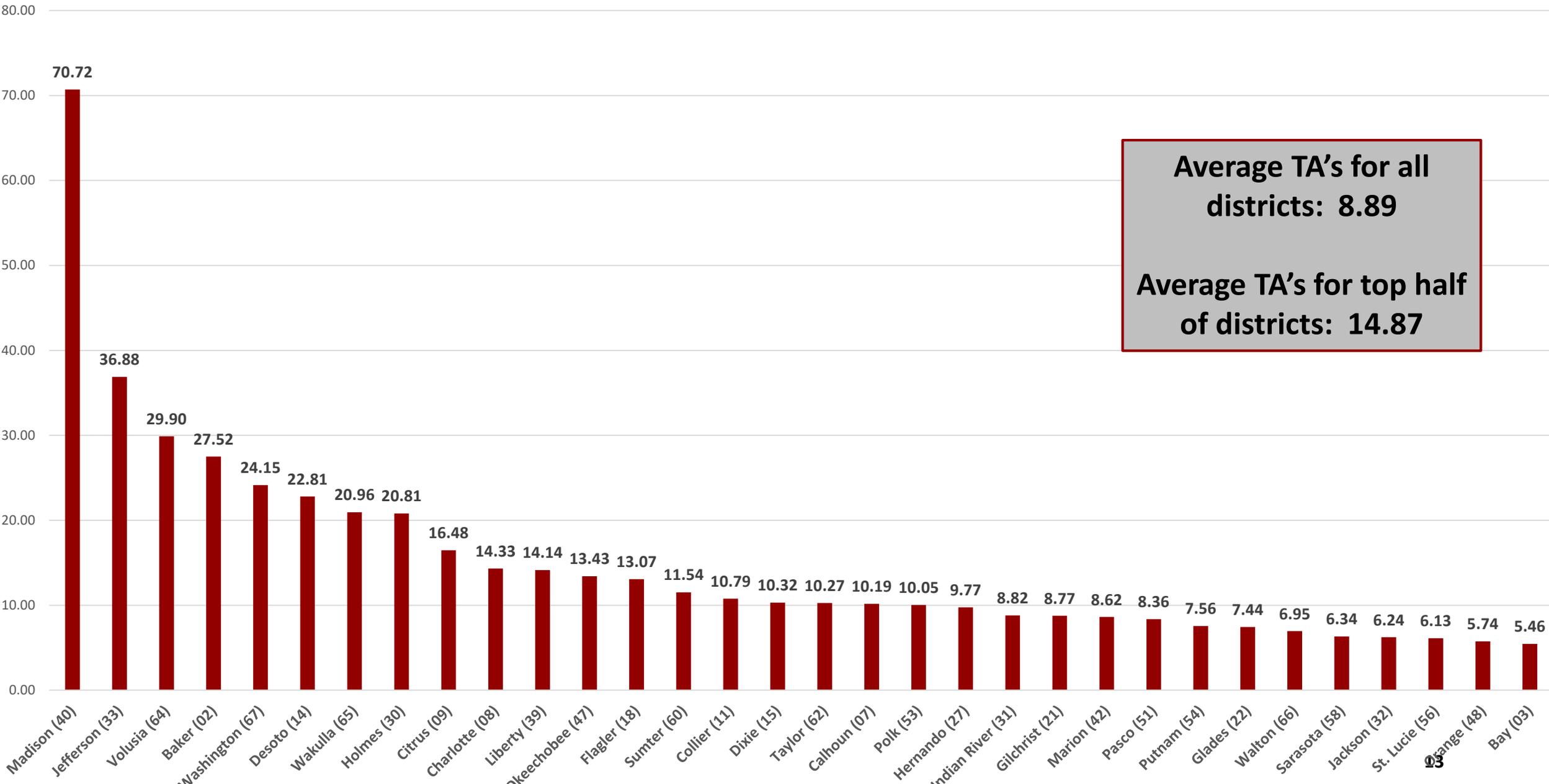
Some districts have the minimally required threat assessment policies and other have robust policies.

The data indicates there is an opportunity for a more robust *threat assessment* and *threat management* processes in Florida schools and that we need a common reporting platform and a consistent process with quality assurance controls.

Threat Assessment Team Data and Policies



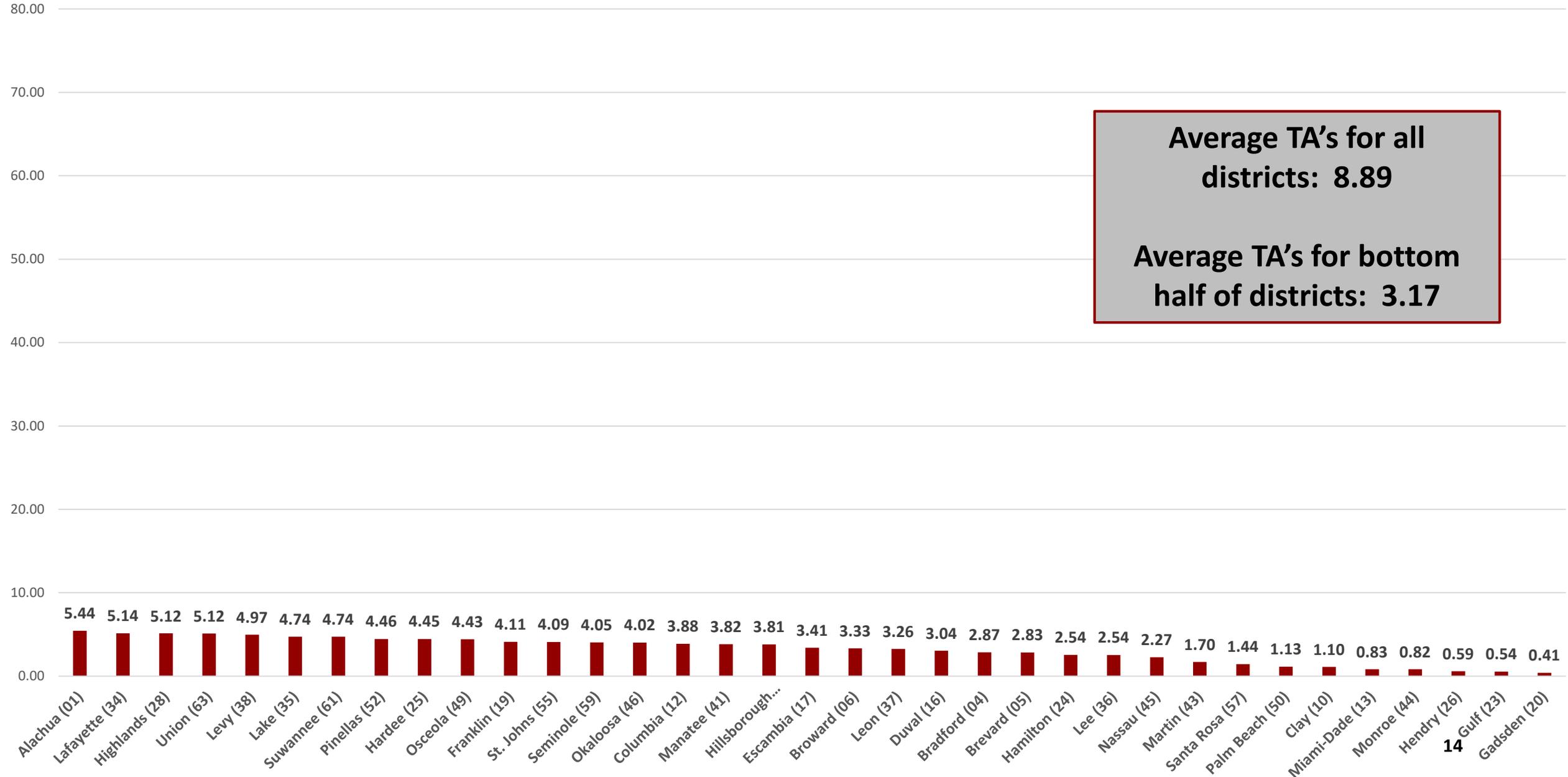
TA's per 1,000 Students – 20/21 SY – Top Half of Districts



Average TA's for all districts: 8.89

Average TA's for top half of districts: 14.87

TA's per 1,000 Students – 20/21 SY – Bottom Half of Districts



District	Student Population	TA's in 2020/2021 SY	TA's per 1,000 Students
Madison	2,418	171	70.72
Volusia	61,076	1,826	29.90
Citrus	15,413	254	16.48
Polk	105,362	1,059	10.05
Sarasota	42,601	270	6.34
Pinellas	96,068	428	4.46
Hillsborough	218,943	835	3.81
Broward	260,230	867	3.33
Duval	126,808	386	3.04
Palm Beach	188,818	213	1.13
Miami-Dade	334,918	277	0.83

- **Madison (2,418 students) and Taylor Counties (2,727 students) have similar student populations but Taylor conducted only 28 TA's compared to Madison's 171.**
- **Lee (94,922 students), Pinellas (96,068), and Polk (105,362) have similar student populations but conducted 241, 428, and 1,059 TA's respectively.**
- **Orange County (199,842 students) has 60,388 fewer students than Broward (260,230) but conducted 1,148 threat assessments compared to Broward's 868 TA's.**

District	Student Population	TA's in 2020/2021 SY	TA's per 1,000 students
Palm Beach	188,818	213	1.13
Hernando	22,621	221	9.77
Brevard	70,988	201	2.83
Charlotte	15,284	219	14.33
Lake	43,689	207	4.74

The number of threat assessments conducted in Palm Beach County was similar to districts with student populations a fraction of Palm Beach's.

District	Student Population	TA's in 2020/2021 SY	TA's per 1,000 students
Miami-Dade	334,918	277	0.83
Sarasota	42,601	270	6.34
St. Lucie	41,779	256	6.13
Lee	94,922	241	2.54
Citrus	15,413	254	16.48

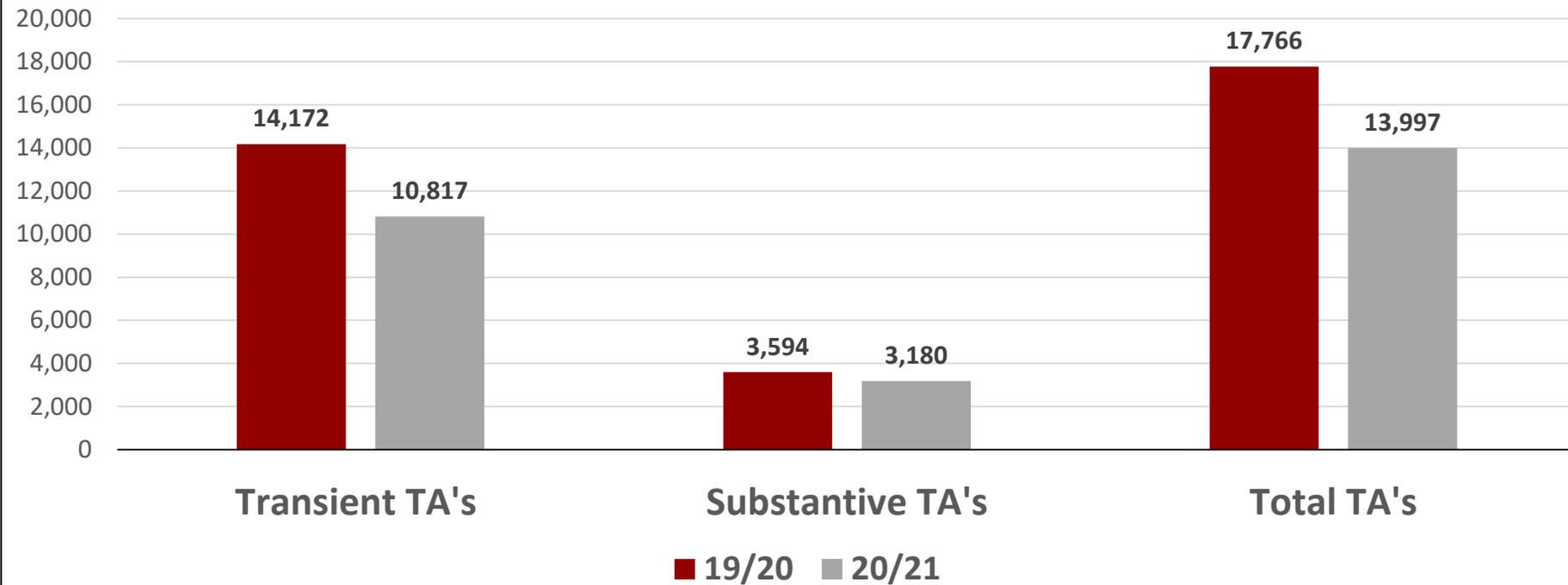
Similarly, Miami-Dade conducted a number of threat assessments similar to districts with student populations a fraction its size.

District	Student Population	TA's in 2020/2021 SY	TA's per 1,000 students
Escambia	38,452	131	3.41
Leon	32,845	107	3.26
Okaloosa	31,601	127	4.02
Madison	2,418	171	70.72
Gilchrist	2,736	24	8.77

Escambia, Leon, and Okaloosa Counties all have similar student populations and their number of threat assessments are relatively consistent. When compared to those counties, Madison has a fraction of the student population but conducted more threat assessments. Gilchrist County shares a student population similar to Madison County but conducted a fraction of the number of threat assessments.



Statewide Threat Assessments 19/20 SY vs 20/21 SY



COVID-19's impact on school populations likely impacted this decrease

Statewide Threat Assessments – 19/20 SY vs 20/21 SY				
	19/20	20/21	Actual Change	% Change
Transient TA's	14,172	10,817	-3,355	-24%
Substantive TA's	3,594	3,180	-414	-12%
Total TA's	17,766	13,997	-3,769	-21%



TAT Policy Review





Volusia County Schools
Threat Response Procedures
Table of Contents

Section 1: Overview and Roles 2

- Types of Threats 2
- Threat Assessment Team Members 4
- Role of Threat Assessment Teams 4

Section 2: Initial Threat Assessment and Determination of Risk Level 4

- Assessing Level of Threat 5
- Baker Act Procedures 8
- Threat Assessment Procedure Specific to a Suicidal Threat 8

Section 3: Communication Issues 11

Section 4: Re-Entry, Plan of Action and Follow-Up Issues 12

- When Should a Re-Entry Meeting Occur 12
- Members of the Re-Entry Team 12
- Goals of the Re-Entry Meeting 13
- Purpose of the Re-Entry Meeting 13

Section 5: Handle With Care (HWC) 14

Section 6: Addendum – Threat Assessment and Response Protocol 16

Lee County Schools

CONTENTS

INTRODUCTION 1

MARJORY STONEMAN DOUGLAS HIGH SCHOOL PUBLIC SAFETY ACT AND THREAT ASSESSMENT 2

- Scope of K12 Threat Assessment Teams 2
- Release of Information 3
- Threat Assessment and Zero Tolerance 3
- Threat Assessment Teams: Access to Information 5

GUIDELINES ON SCHOOL THREAT ASSESSMENT 5

POLICY ON SCHOOL THREAT ASSESSMENT PROGRAM 7

PROCEDURES FOR SCHOOL THREAT ASSESSMENT TEAMS 8

- Purpose 8
- Definitions 8
- Threat Assessment Team 12
- District Threat Assessment Team 14
- Procedures 14

SCHOOL THREAT ASSESSMENT GUIDELINES 17

- Principles of Threat Assessment 18
- Assumptions 18
- Principles 20
- Identifying and Reporting Threats 21
- Assessing and Classifying Threats to Determine Response Strategies 22
- Key Questions 25
- Assessing Potential Threatening Behavior 27
- Documentation 29

RESPONDING TO AND MANAGING THREATENING SITUATIONS 30

- Subject-based strategies or interventions 30
- Target-Based Case Management Strategies 32
- Environmental / Systemic Case Management Strategies 33
- Monitoring for the Impact of Precipitating Events on Case Management 33

BUILDING CONSISTENCY BETWEEN THREAT ASSESSMENT & MANAGEMENT 34

- Examples of Transient Threat Responses 34
- Examples of Substantive Threat Responses 35
- Students with Disabilities 37

WORKPLACE VIOLENCE, DOMESTIC VIOLENCE, INTERPERSONAL VIOLENCE 39

- Procedure for Assessing and Responding to Workplace-Related Threats, Domestic Violence or Interpersonal Violence 39
- Purpose 39
- Definitions 39
- Recommended Procedures 40

REVIEWING RECORDS AND THE FLORIDA SCHOOLS SAFETY PORTAL (FSSP) 43

APPENDIX A. Selected Florida Laws Related to Threat Assessment 49

- Selected Board Policies Related to Threat Assessment 51
- Related Reading on School/Campus Threat Assessment 52
- Related Reading on Workplace Threat Assessment 53
- Related Resources 54



CLAY COUNTY DISTRICT SCHOOLS
Police Department
Standard Operating Procedure 10.XX
THREAT ASSESSMENT POLICY

EFFECTIVE:	REVISED:	RESCINDS:
August 1, 2019	August 1, 2020	

- A. PURPOSE:** In accordance with Marjory Stoneman Douglas High School Public Safety Act, the following is the Clay County District Schools Threat Assessment Policy for all schools. The Clay County District Schools shall annually review these policies and recommend any changes for the upcoming school year. The School Safety Officer (or designee) shall distribute this to school administrators by August 1 of each year. The threat assessment policy shall be interpreted and applied consistently with all applicable state and federal laws. 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.
- B. SCOPE:** This policy shall apply to all Clay County District Schools Employees and the District Police Department sworn members.
- C. DISCUSSION:** N/A
- D. POLICY:** It shall be the policy of the Clay County District Schools and the District Police Department to conduct Threat Assessments.
- E. DEFINITIONS:**
- Threat:** A threat is a communication of intent to harm someone that may be spoken, written, gestured or expressed in some other form, such as via text messaging, email or other digital means. An expression of intent to harm someone is considered a threat regardless of whether it is communicated to the intended target(s) or whether the intended target is aware of the threat. Threats may be implied by behavior that an observer would reasonably regard as threatening, planning or preparing to commit a violent act. Not all types of misbehavior that may warrant discipline or even criminal consequences are threats. It is limited to instances where there is a threat to harm someone else. If

The most thorough and well-developed policies come from single-source policy/procedure manuals, such as in Volusia, Seminole, Clay, and Lee.

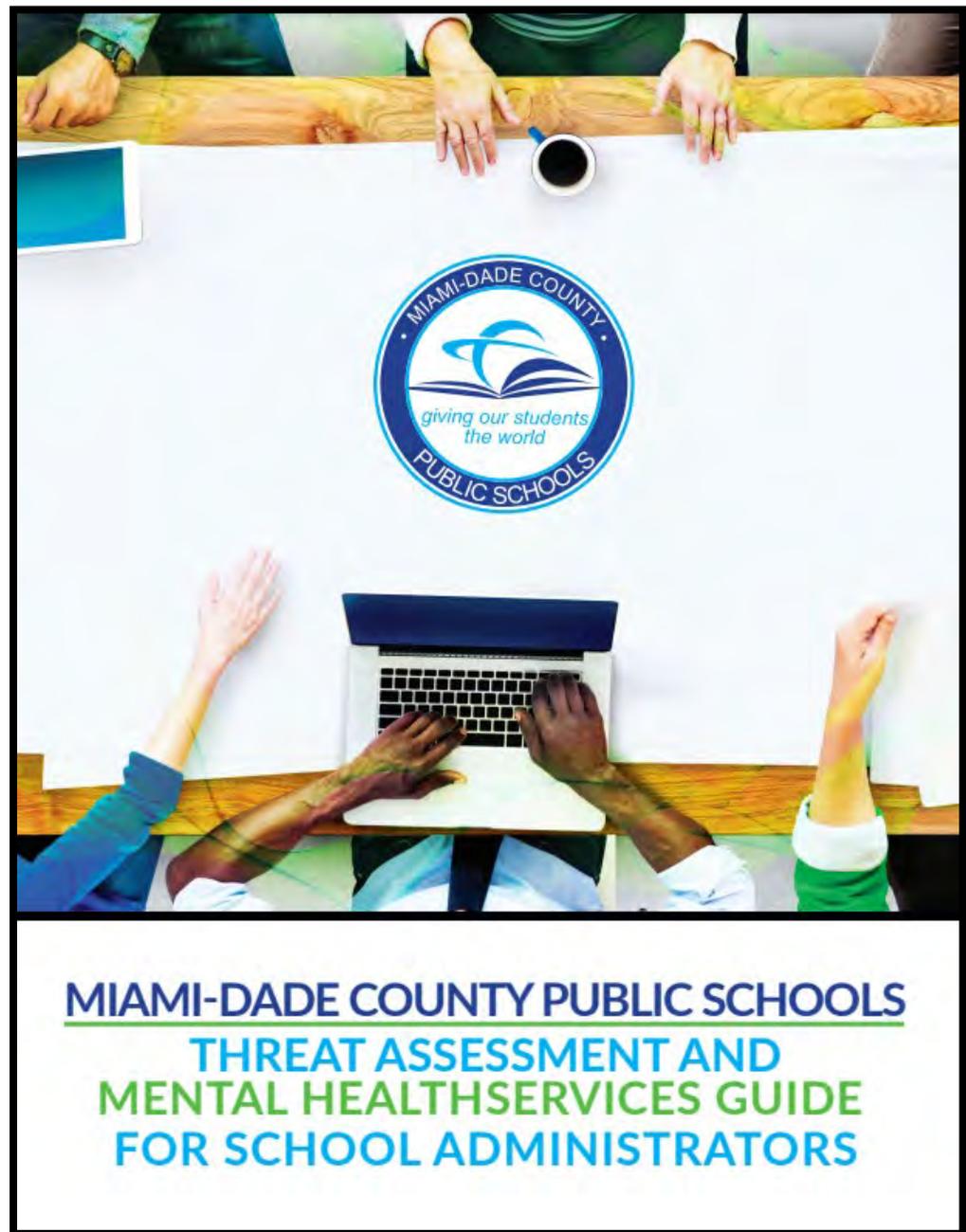


These comprehensive, single-source policies explain the purpose of the TAT; provide background information and meaningful definitions with related examples; explicit directions (shall, will, required, etc...); and step-by-step guidance specific to their district including re-entry plans.

Examples:

- “Threats can be classified into one of four categories (i.e., direct, indirect, veiled or conditional).” (Volusia)
- “All school District employees, volunteers, and contractors are required to report any expressed threat(s) or behavior(s) that may represent a threat to the community, school, or self.” (Lee)
- “STEP 5: Implement and monitor the safety plan. The safety plan should be documented and should include maintaining contact with the student.” (Clay)
- “Aberrant behavior- Behavior by an individual that involves actions, statements, communications, or responses that are unusual for the person or situation...” (Seminole)

Miami-Dade's 50 page Threat Assessment Guide



TAT Policy Review

Finding #1: The district's threat assessment policy is not necessarily indicative of the quality or quantity of TA's conducted.

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District	19/20 Student Population	Transient TA's		Substantive TA's		Total TA's	
		19/20	20/21	19/20	20/21	19/20	20/21
Escambia	39,730	850	125	17	6	867	131
St. Lucie	41,875	261	216	35	40	296	256
Clay	38,264	11	36	2	6	13	42

Escambia, St. Lucie, and Clay Counties all have good TA policies and similar student populations but their number of TA's vary greatly.

Finding #1: The district's threat assessment policy is not necessarily indicative of the quality or quantity of TA's conducted.

District	19/20 Student Population	Transient TA's		Substantive TA's		Total TA's	
		19/20	20/21	19/20	20/21	19/20	20/21
Seminole	68,104	322	216	96	52	418	268
Volusia	63,000	1,380	1,298	408	528	1,788	1,826
Osceola	69,932	125	227	36	77	161	304

Seminole, Volusia, and Osceola Counties all have similar students populations. Seminole and Volusia have very good policies but there is a significant difference in their number of threat assessments. Osceola has an average policy but their number of TA's are more closely aligned with Seminole County.

TAT Policy Review

Finding #2: Many districts lack a comprehensive, single-source TAT policy; the various components of the TAT process are spread throughout multiple, lengthy documents.

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- Jackson County provided seven digital files (314 pages) to FLDOE:
 - Jackson County School Police Department SOP's - 85 pages
 - Jackson County Mental Health Allocation Plan - 11 pages
 - School Policy, Safe and Secure Schools 3.40 - 6 pages
 - MOU's with multiple mental health providers - 94 pages
 - District Procedures for Student Suicide - 44 pages
 - TAT Training Sign in sheets and PowerPoint - 38 pages
 - Risk/Threat Assessment Procedures - 36 pages

Finding #2: Many districts lack a comprehensive, single-source TAT policy; the various components of the TAT process are spread throughout multiple, lengthy documents.

Citrus' response included six different documents and they make reference to each of them in their responses. Escambia, Okaloosa, Nassau, and Osceola are all laid out in a similar manner.

Citrus - Safe and Secure Schools Policy 3.40, paragraph V, section A5 and A6 (page 3)

Citrus - Comprehensive School Threat Assessment Guidelines-Forms, page 8, Threat Response

Citrus - 2019-2020 Code of Student Conduct, page 13, paragraph (b)

Citrus - Safe and Secure Schools Policy 3.40, paragraph V, section A5 and A6 (page 3)

Citrus - Mental Wellness Resource Flyer

Citrus - List of Mental Health Providers

TAT Policy Review

Finding #3: Responses to the OSS were, at times, insufficient or inaccurate.

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Mandates from DOE and Florida Statutes dictate what must be included in district policies. An example is the requirement that school personnel must report all mental health or substance abuse crisis situations and actions taken to the threat assessment team, which must contact the other agencies involved with the students and any known service providers to share and coordinate any necessary follow-up actions.

Jackson County Schools Response	Analysis
“The school District of Jackson County Risk/Threat Assessment Procedures Page 18, 22, and 23”	This 36 page document is not a policy, they are the CSTAG forms, and do not fulfill this statutory requirement.
“Jackson County Mental Health Assistance Allocation Plan page 3, paragraphs 2, 3, 4 and 5; page 4, paragraphs 2, 4, 5; page 5, paragraphs 3–6”	This 11 page document appears to cover the district’s entire mental health delivery model including the budget. There are vague references to this requirement but no explicit direction to staff.
“Jackson County School District Student Suicide: Signs Assessment, Interventions, and Procedures Pages 2, 4, 5, 30”	This 44 page document is specific only to suicide threats or attempts.



Threat Assessment Team Data and Policies

