Rethinking School Safety in the New Normal

Comprehensive Violence Prevention, Threat Assessments, Behavioral and Mental Health Services in Our Schools

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INTRODUCTION

Given the recent chronicled events regarding school violence and threats, a review of the statistics seems to confirm that school administrators and law enforcement officials find themselves in the untenable position of having to make critical decisions about the validity of threats with little to no threat assessment protocols or comprehensive threat assessment system, few established best practices, outdated procedures, and typically, a lack of education-based school safety and mental health training. In the wake of the Parkland shooting, gun-related issues and law enforcement solutions have become the central focus to the exclusion of a comprehensive, all-hazards approach to both violence prevention and response.¹

In my many roles, as special education teacher for students with autism spectrum disorders and emotional behavioral disabilities, behavior specialist, assistant principal, school principal, and as a special education director in two very large urban school districts, I have personally experienced some very tragic events on the job that unexpectedly escalated to a crisis-level involving incidents of violence and threats initiated by students in our schools. Fortunately, the school districts I worked in used available frameworks as resources.²

District leadership developed internal well-defined crisis and emergency management procedures in which key district/school, mental health, and district law enforcement personnel were trained to activate risk mitigation and prevention practices, and implement them when needed, following the protocols established and codified in policies and procedures.³ Our district and school crisis teams had plans and were trained on the implementation of “code red” and rehearsed “critical incident” scenarios. Behavioral threat assessments were conducted based on the best research available at the time. Students identified in need of services were provided counseling or referred for mental health services in the community.

However, despite these frameworks, the processes we often used when conducting and documenting a behavioral threat assessment were paper- and form-driven, had great variability, lacked uniformity and were sometimes not consistently implemented as they were intended which impacted fidelity. One essential prevention strategy that all districts can benefit from implementing is an evidence-based behavioral threat assessment which can identify serious threats and prevent violence in schools.

PREVENTION

There needs to be a greater focus on prevention efforts and these must be informed by assessing risks and conducting threat assessments in order to proactively prevent, identify, assess, plan, implement, monitor, review and systematically record all events that result in violence and threats in schools. Policies and procedures need to be adopted, and crisis and emergency management plans put in place with the essential protocols that drive and help implement these processes effectively with fidelity. All personnel need to be trained and practice real-life scenarios with simulations that lead to confidence in conducting a behavioral threat assessment and addressing violence in schools.

“It’s critical that all personnel are trained with real-life scenarios to help conduct threat assessments with fidelity.”

After the incident in Parkland, the Florida legislature passed the Marjory Stoneman Douglas High School Public Safety Act (MSDHSPSA, SB 7026), an extensive bill addressing school safety and mental health that allocated additional funds to school districts to support implementation efforts. The new Florida law went into effect July 1, 2018. Once the law was enacted, the Marjorie Stoneman Douglass Public Safety Commission was appointed by the Governor of the State of Florida to investigate all aspects of the tragic event that happened in Parkland. The commission’s initial report to the Governor, Speaker of the House of Representatives and Senate President was submitted on January 2, 2019.⁴ One particularly pointed finding stated, “Currently there is not a standard threat assessment process in Florida and there is no known automated threat assessment system known to the commission.” Most recently, Senate Bill 7030: Implementation of the Recommendations of the Marjorie Stoneman Douglas High School Public School

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Safety Commission Report was signed by the governor. This new legislation directs the Office of Safe Schools to develop a standardized, statewide behavioral threat assessment instrument for use by all public schools by August 1, 2019 and establish a Statewide Threat Assessment Database Workgroup to make recommendations on developing such a statewide database by December 31, 2019.

**STEPS FOR PREVENTING TARGETED SCHOOL VIOLENCE**

According to the National Threat Assessment Center (NTAC), the goal of a threat assessment is to identify students of concern, assess their risk for engaging in violence or other harmful activities, and identify intervention strategies to manage that risk. This process begins with establishing a comprehensive targeted violence prevention plan that requires schools to:

1. Establish a multidisciplinary threat assessment team
2. Define prohibited or concerning behaviors
3. Create a central reporting mechanism
4. Determine the threshold for law enforcement intervention
5. Establish assessment procedures
6. Develop risk management options
7. Create and promote a safe school climate
8. Conduct training for all stakeholders

**Comprehensive Threat Assessment Models and Solutions**

The Virginia Model for Student Threat Assessment, an evidenced-based violence prevention training program developed by Dr. Dewey Cornell in 2010, is a model that has been implemented in more than 1,000 schools and organizations throughout the United States.

The Virginia Threat Assessment model is applicable to all students, and provides a seven-step decision tree and triage approach which will enable most threats to be acted upon immediately and resolved quickly. Schools are trained to establish multi-disciplinary teams, which typically include educators, school administrators, counselors, psychologists, social workers, community organization leaders, and resource officers. One of the key factors in the Virginia Model is to distinguish between transient threats (those threats spoken in anger and frustration and can be resolved easily) and substantive threats (those threats which include serious intent and detailed plans). The context of the threat is vital to determine its gravity.

A threat assessment will help delineate the difference between a student making a threat versus the student who poses a threat. As stated by Dr. Cornell, "Any student can make a threat, but relatively few will engage in the planning and preparation necessary to carry out the threat." For threats deemed substantive, mechanisms are quickly put in place to notify and protect potential victims, engage law enforcement, initiate mental health screens, and develop safety plans. A good threat assessment plan, and a comprehensive behavioral threat assessment solution for capturing and documenting these processes from beginning to end provide schools
with the tools necessary to quickly evaluate the seriousness of threats. They enable school personnel to take action, develop plans, implement, monitor, use data and reports to make decisions, connect students to much needed behavioral and mental health services, and conduct internal auditing on the fidelity of implementation to help inform and strengthen school safety practices.

**IMPORTANCE OF BEHAVIORAL AND MENTAL HEALTH SERVICES**

The recent statistics on guns, shootings, school violence and threats continually point to the strong connections that exists between school shootings and student behavioral and mental health. When it comes to mental health we often hear the phrase “if only.” If only we knew what was going on, if only we had recognized the signs that would lead to acts of violence and threats, if only we knew there was access to weapons, if only we had recognized the behavioral and mental health warning signs early enough to enable access to treatment and help mitigated risks.

Overall,

- Seventy-five percent of students struggling with mental illness do not receive mental health services even though mental health is a key component in students’ healthy development.
- One in five children from birth to age 18 years has a diagnosable mental disorder.
- One in ten youth have a serious mental health problem that is severe enough to impede upon their ability to function at home, in the school or community.
- Approximately half of all lifetime mental health disorders start by the mid-teens, and the onset of all major mental illnesses happen as early as seven to 11 years of age.

Among students involved in attacks at school,

- Only one-third of perpetrators (34 percent) ever received a mental health evaluation.
- Less than one-fifth (17 percent) were diagnosed with a mental disorder.
- Seventy-eight percent of perpetrators had a history of suicide attempts or suicidal ideations prior to their attack.
- Sixty-one percent of perpetrators had a documented history of experiencing symptoms of extreme depression or desperation, prior to an attack.
- Eighty-seven percent of perpetrators left behind evidence that they were victims of bullying or severe bullying.
- Ten percent of the perpetrators who were receiving treatment for their diagnosed mental illness failed to comply to take their prescribed psychiatric medications.

A greater focus is needed on making behavioral health, mental health, and when appropriate, medical services, a priority since these are strongly linked to educational achievement and will help a student’s capacity to alter his or her behavior and develop impulse control, personal responsibility (taking ownership of behaviors), and social information processing skills (the ability to infer the intentions of others). Implementing preventative strategies in these priority areas will likely contribute to mitigating risks and reducing youth violence within schools.

The recent focus on guns and shootings as it pertains to incidents of school violence is clearly important as depicted in the data maintained by the Center for Homeland Defense and Security that compiles any incidents “in which a gun is brandished, fired, or a bullet hits school property for any reason, regardless of the number of victims (including zero), time, day of the week, or reason.” An accompanying report defined 19 categories of apparent cause as accidental, anger, bullying, targeted victim, dispute escalation, gang-related, hostage standoff, drug-related, indiscriminate, property damage, mental health episode, murder/suicide, officer/guard source, racial, robbery, self-defense, attempted suicide, and unknown. These causal factors seem to justify supporting a greater focus on the identification and management of issues of mental health/behavior (anxiety, depression, suicidal thoughts, etc.) before violent incidents occur.
Many states passed or have "on the docket" legislation concerning mental health in schools. The threat of gun violence does not just suddenly arrive at the doorstep of schools. There is typically an incubation period in which a student is dealing with behavior/bullying issues at school or in the community at large, as reflected in the research that indicates many students are frequently bullied over time. These incidents need to be identified, managed, and tracked as part of an early warning/multi-tiered system of supports so that the threat assessment is informed by multiple data points. In this way, the necessary information is considered and the process can be successful.

**BEHAVIORAL THREAT ASSESSMENTS AND STUDENTS WITH DISABILITIES**

A recent Special Education Law blog referenced some thought-provoking points to consider regarding the current heightened attention to student threats and the impact this may be having on the perceptions and profiling of some students with disabilities. For example, the author notes that the overwhelming majority of students with special needs represent no threat to others. However, fear and anxiety have led school staff to treat many students as potential threats to school safety including some students with disabilities. Students with disabilities are far more likely to face suspension or arrests at school and represent 26 percent of students who received at least one suspension during the 2015-16 school year. Thus, students with a physical or mental disability are much more likely to be referred for discipline in a system that should be focused on their education and improving the outcomes and results for all students.

Any threats should be taken in context, through the lens of threat assessment, and ultimately viewed as transient threats. What these students need are more support and more behavioral and mental health services, not removal from or stigmatization in their school placements. Implementation of behavioral threat assessment supervision and monitoring plans benefits all students and promotes healthier and safer school environments for everyone. Therefore, school staff should exercise caution when assessing threats made by students with disabilities and consider the context and manifestation of their disability and the protections afforded to them through the Reauthorization of the Individuals with Disabilities Education Act of 2004, specifically when it comes to the regulations addressing the discipline of students with disabilities.

**Manifestation Determination Reviews, Expulsion Hearings and School Behavioral Threat Assessments**

For students receiving special education services, it is important to note the distinction between a threat assessment from a manifestation determination review (MDR). An MDR focuses on a student’s special education needs and services as it relates to a specific event and determines whether or not a student’s specific act was a manifestation of the identified area of disability. MDRs may lead to changes in service and placement or to an expulsion hearing. An expulsion hearing determines whether a specific behavior violated school policy and whether a student may be expelled. In contrast, a behavioral threat assessment determines the level of concern regarding a student’s pattern of behavior over time and leads to preventative planning for safety to reduce risk. While information from a behavioral threat assessment may be used in an MDR or expulsion hearing, it does not replace those processes.

**FUTURE IMPLICATIONS**

While progress still needs to be made, a review of the current trends emerging from the heightened focus on school security and safety through enacted and/or proposed legislation across the nation highlights some of the following key changes that are impacting practices:

- Balancing zero tolerance policies with a greater emphasis on prevention rather than security.
- Using mobile, suspicious activity reporting tools such as FortifyFl.
- Implementing prevention-focused evidenced-based behavioral threat assessment models.
- Establishing and standardizing behavioral threat assessment instruments.
- Developing comprehensive behavioral threat assessment data collection tools and databases.
• Prescribing threat assessment reporting requirements.
• Placing greater emphasis on research, evaluation and evidenced-based school security, school safety programs, wrap-around services and implementing mitigation strategies.
• Growing the number of partners needed to implement a more comprehensive approach towards addressing school safety.
• Adopting emergency management and critical incident response plans at the state, district and school level.
• Identifying students who are on a pathway to violence and referring them for support and services.
• Recognizing the importance of behavioral and mental health services as an essential part of any school safety strategy.
• Expanding and expediting services for students with mental or emotional behavioral disabilities.
• Legislating systemic improvements focused on hardening school security and enhancing overall school safety, behavioral and mental health in schools with laws such as the Marjory Stoneman Douglas High School Public Safety Act (MSDHS PSA, SB 7026 and SB 7030) enacted in Florida.
• Requiring school safety plans, with at least 42 states now requiring schools to conduct safety or security drills.viii
• Proposing similar legislation “on the docket” or currently in process in many states across the nation.
• Dedicated state funding appropriated to provide the necessary resources for school districts to implement the requirements of enacted comprehensive school security, safety, behavioral, and mental health provisions in legislation.
• Providing greater flexibility in the use of funds to improve overall school safety.

PCG’s BTA SOLUTION

PCG leveraged the eight steps of the NTAC’s proposed framework as a guide when partnering with school districts in Virginia and Florida to develop a comprehensive Behavioral Threat Assessment (BTA) solution based on the Virginia Model for Student Threat Assessment. The following graph depicts a conceptual workflow designed to support cross-functional team efforts to collaborate and implement a seamless and intuitive process from beginning to end when addressing incidents of student threats:
Our consulting services also help support the implementation of BTA with fidelity...

Our approach is multidimensional, emphasizes the participation of district leadership and multiple stakeholders responsible for behavioral threat assessment, and includes wrap-around technical assistance support. It is grounded in our experience and research in best practices.

Our Approach
1. Develop district specific BTA policies that are based on evidence and best practices.
2. Create and publish a comprehensive manual to provide BTA teams guidance on the implementation of policies and procedures that will drive practices.
3. Design intuitive processes that will support consistency and confidence in practice
4. Develop and deliver blended learning training and support in all essential areas (e.g., privacy, communication, collaboration, documentation reporting, rehearsing real-life plays, scenarios, and simulations).
5. Implement an automated BTA solution as a single unifying comprehensive tool to capture, document, monitor, and generate useful reports to address accountability from beginning to the end of the process aligned to best practices.

CONCLUSION

The continued incidence of gun-related and other types of events involving school violence and threats perpetrated by students across the nation have heightened the urgency of legislators, educators, law enforcement officers, behavioral and mental health professionals, parents, and community members to rethink school safety and security. A concerted effort has been mobilized nationwide to prevent and address the rising tide of violence in our schools with a greater sense of purpose.

Many states are enacting legislation and school boards are adopting policies and procedures to address school safety, security, threat assessments, and behavioral and mental health supports. There is a greater emphasis being placed on prevention, risk mitigation, implementing evidenced-based behavioral and mental health threat assessments and enhancing the available services for students at risk, incorporating standards and tools, using evidenced-based practices, and providing training and support to school teams charged with implementing all of these practices.

Stakeholders are becoming more aware and cautious in not making generalized assumptions about subgroups of students and reviewing the data and reports that are available to them in order to strengthen the overall implementation of practices. More states and school districts are adopting and using evidenced-based behavioral threat assessment models and implementing them since these are now strongly supported by research, legislation, policies, manuals, tools, automated solutions, and dedicated funding.

It is hoped that the concerted actions taking place collectively across our nation and referenced in this paper will help stem the tide and make school safety, security, threat assessments, and behavioral and mental health services stronger in practice, thus supporting the social and emotional well-being and safety of all students in our schools.

ABOUT THE AUTHOR

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For more information about PCG and our Behavioral Threat Assessment (BTA) solution, please contact your local PCG representative, visit www.EDPlan.com, or reach out to us directly at pcgeducation@pcgus.com or (800) 210-6113.

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References

1. The Educator’s School Safety Network www.eSchoolSafety.org


7. Making Prevention a Priority for a Healthy Future https://pcgus.proofhq.com/review/g2gG3hPpmxVDGyHc7koPjOFgqwJpDz1n82u3diFmcj6WOTRY9


15. FortifyFl Reporting Tool https://www.getfortifyfl.com/

