

School-Based Threat Assessment

Hadley Public Schools is committed to providing a safe and secure learning environment for students and staff. This policy establishes a school-based threat assessment program to provide for timely and methodical school-based threat assessment and management.

Threat assessment best occurs in school climates of safety, respect, and emotional support. Student behavior rather than a student's demographic or personal characteristics will serve as the basis for a school-based threat assessment.

The threat assessment process is distinct from student discipline procedures. The mere fact that the district is conducting a threat assessment does not by itself necessitate suspension or expulsion and the district will not impose suspension or expulsion *solely* for conducting a threat assessment. Further, suspension or other removal from the school environment, unless coupled with containment and support, can create the risk of triggering either an immediate or a delayed violent response. However, nothing in this policy precludes district personnel from acting immediately to address an imminent threat, including imposing an emergency removal, if the district has sufficient cause to believe that the student's presence poses an immediate and continuing danger to other students or school personnel or an immediate and continuing threat of material and substantial disruption of the educational process.

Structure of Threat Assessment Teams

The superintendent shall establish and ensure the training of a multidisciplinary, multi agency threat assessment team or more than one such team to serve district schools. As the threat assessment team must be multidisciplinary and multi agency, it might include persons with expertise in:

- Counseling, such as a school counselor, a school psychologist and/or school social worker.
- Law enforcement, such as a school resource officer.
- School administration, such as a principal or other senior administrator.
- Other district or school staff.
- Community resources.
- Special education personnel (Director, teachers, or related services personnel).
- Educational staff member.

Not every multidisciplinary team member needs to participate in every threat assessment. When faced with a potential threat by, or directed towards, a student receiving special education services, the threat assessment team must include a team member from special education.

Although parents, guardians, or family members are often interviewed as part of the threat assessment process, neither the student nor the student's family members are part of the threat assessment team. This does not diminish the district's commitment that school personnel will make every reasonable attempt to involve parents and the student in the resolution of the student's behavioral violations.

Information Sharing Policies and Procedures

Each threat assessment team member, whether a teacher, counselor, school administrator, other school staff, contractor, consultant, volunteer, or other individual, functions as a "school official with a legitimate educational interest" in educational records controlled and maintained by the district. The district provides the threat assessment team access to educational records as specified by the Family Educational Rights and Privacy Act (FERPA). No member of a threat assessment team, including district / school-based members and community resource/law enforcement members, shall use any

student record beyond the prescribed purpose of the threat assessment team or re-disclose records obtained by being a member of the threat assessment team, except as permitted by FERPA.

Functions of the Threat Assessment Team

The threat assessment team:

- Promptly addresses every threat; however, **voicing a threat should not be used as the principle determinant in making judgments about the likelihood of a school attack or a student posing a threat.**
- Identifies and assesses the behavior of a student that is threatening, or potentially threatening, to self, other students, staff, school visitors, or school property. Threats of self-harm or suicide unaccompanied by threats of harm to others should be promptly evaluated according to HPS Suicide Prevention and Intervention Protocols.
- Gathers and analyzes information about the student's behavior to determine a level of concern for the threat. The threat assessment team may conduct interviews of the person(s) who reported the threat, the recipient(s) or target(s) of the threat, other witnesses who have knowledge of the threat, and where reasonable, the individual(s) who allegedly engaged in the threatening behavior or communication. The purpose of the interviews is to evaluate the individual's threat in context to determine the meaning of the threat and intent of the individual. The threat assessment team may request and obtain records in the district's possession, including student education, health records, and criminal history record information. The purpose of obtaining information is to evaluate situational variables, rather than the student's demographic or personal characteristics.
- Determines the nature, duration, and level of severity of the risk and whether reasonable modifications of policies, practices, or procedures will mitigate the risk. The threat assessment team will not base a determination of threat on generalizations or stereotypes. Rather, the threat assessment team makes an individualized assessment, based on reasonable judgment, best available objective evidence, or current medical evidence as applicable.
- Communicates lawfully and ethically with each other, school administrators, and other school staff who have a **need to know** of the particular information in order to support the safety and well-being of the school, its students, and its staff.
- Reports its determination to the superintendent or designee in a timely manner.

Depending on the level of concern determined, the threat assessment team develops and implements intervention strategies to manage the student's behavior in ways that promote a safe, supportive teaching, and learning environment, without excluding the student from the school.

In cases where the student whose behavior is threatening or potentially threatening also has a disability, the threat assessment team aligns intervention strategies with the student's individualized education program (IEP) or the student's plan developed under section 504 of the rehabilitation act of 1973 (section 504 plan) by coordinating with the student's IEP team or section 504 plan team. Although some of the functions of a school-based threat assessment may run parallel to the functions of a student's IEP team or 504 plan team, school-based threat assessments remain distinct from those teams and processes.

Data Collection, Review and Reporting

The superintendent shall establish procedures for collecting and submitting data related to the school-based threat assessment program that comply with federal and state monitoring requirements, processes, and guidelines.

Other tasks of threat assessment team

The threat assessment team may also participate in other tasks that manage or reduce threatening or potentially threatening behavior and increase physical and psychological safety. This may include:

- Providing guidance to students and staff regarding recognition of behavior that may represent a threat to students, staff, school, the community, or the individual;
- Providing informational resources for community services boards or health care providers for medical evaluation or treatment, as appropriate;

- Assessing individuals other than students whose behavior poses a threat to the safety of students or staff and notify the superintendent or designee of such an individual.

Threat Assessment Protocol

Whenever school and/or district administration receives information that an individual may have made a threatening comment or action targeting oneself, others, or a Hadley school, the threat-assessment protocol is enacted and the administrative team immediately contacts the Hadley Police Department. In general*, the threat assessment protocol and action steps are as follows:

- The administrative team immediately works to determine the validity of the threat and the risk it poses based on the information available and the origin of the threat
 - Information that may be gathered during the assessment process may include, but not be limited to: witness statements, surveillance footage, written communications, and/or student records information.
- The Hadley Police Department engages in a separate investigation of the potential threat, and in cooperation with the administrative team, a final determination is made regarding the level of risk the threat poses.
- Whenever appropriate, Hadley Public School mental health professionals assist in determining the danger to oneself, others, or the school population.
- Depending upon the level of risk determined by the entire team, any one of the following next steps may occur separately or in conjunction with one another:
 - If there is a credible threat, the School would enact security measures during the school day or possibly close the school if the threat is made in advance of the school day.
 - If it is determined that the information does not create a valid threat, the School would continue normal operations or make accommodations to ensure a safe environment.
 - Based on the information gathered in the threat assessment, the school could implement appropriate school-determined consequences.
 - Based on the information gathered in the threat assessment, the school could seek further risk-assessment evaluations by mental health professionals outside of the school to prevent harm to self or others.
 - Upon consideration of all available information, the School could consider school re-entry requirements when appropriate.
 - After the incident is over, the entire team debriefs procedures and resulting consequences.

** This overview is generalized to preserve a level of operational security for the school district and law enforcement.*

Community Communication

With each of these potential threats, the School will follow the threat assessment protocol; however, each situation is treated as unique, and individual circumstances require case-specific determinations.

It is important to note, the school community, including teachers, and students are not legally entitled to the details of these confidential and individual circumstances. However, if the School has information that indicates a threat is credible, it will take decisive action and provide instruction immediately to ensure maximum safety to those at risk.