Review of the Three Arapahoe High School Shooting 2013 Reports

Facilitated by the Colorado School Safety Resource Center

September 2016

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Executive Summary

On January 22, 2016, the School Safety and Youth Mental Health in Crisis Interim Committee established under SB15-214 met and heard summaries of the three reports written on the Arapahoe High School shooting tragedy that occurred in December 2013 and sadly took the life of Claire Davis.

Three separate reports were commissioned including reports from the Center for the Study and Prevention of Violence (CSPV) at the University of Colorado, Boulder, a report from Linda M. Kanan, Ph.D. and John Nicoletti, Ph.D. as well as the report from Safe Havens International. All three documents made recommendations for schools to address safety issues from the lessons learned at Arapahoe High School.

The Colorado School Safety Resource Center (CSSRC/Center) felt an obligation to convene a working group of school officials and others to review the recommendations which have the potential to significantly impact Colorado schools. This report is a culmination of that work.

The committee members agreed with a majority of the recommendations but recognized that most would require additional resources in order to be fulfilled. Time and again even our Front Range participants made note of how difficult many of the recommendations would be for our rural colleagues to accomplish. **A chart that summarizes all the topics reviewed and the committee's responses to the recommendations can be found in Appendix A.**

Mental health resources are scarce in Colorado, particularly in the rural parts of the state, as well as in most of our schools. Some school districts have the services of a school psychologist for only half of one day per week. When talking about students that might be at risk of acting out violently, identifying them and then finding the necessary supports to interrupt their path toward violence is extremely difficult without enough training and resources for our school professionals.

The committee members acknowledged that even if all the recommendations could be met by any district, there would still be no guarantee of preventing a future tragedy.

We found it interesting that only five recommendations were common to all three reports:

1. Schools should utilize climate surveys.
2. There should be written agreements (memoranda of understanding or MOUs) between school districts and law enforcement agencies about information sharing.
3. School staff should be versed in the Family Educational Rights & Privacy Act (FERPA) including the fact that FERPA does not prevent reporting on students about whom staff have safety concerns.
4. Districts should utilize the 11 questions of the U.S. Secret Service in their threat assessment process.
5. Schools are encouraged to promote Safe2Tell.

Committee members felt, in general, that schools were doing as much as possible to support students and provide a safe climate with the available resources currently in their buildings. The hope is that this review will highlight the need for more support for our schools so that the professionals can continue and enhance the support available to our students. By working together we all hope to avoid any future school tragedies.

The Colorado School Safety Resource Center would like to thank all those school and agency colleagues who took the time to engage in this review process, sharing their expertise on topics that impact them and their students daily. The professionals who attended meetings were engaged and extremely thoughtful in their discussions. They demonstrated how very much they care about the safety of Colorado students. Although academics are their first priority, all committee members acknowledged the relationship between safety and successful student achievement. Many also expressed their appreciation for an opportunity to give feedback on issues of school safety as they were not part of the discussions of the SB15-214 committee meetings.

Respectfully,

Christine R. Harms MS
Director

Background

The CSSRC sent an invitation to all members of the SB15-214 Committee to join the review working group (RWG). Two members of the 214 Committee accepted that invitation, Kate O'Donnell and Greg MacDonald.

Additionally, the Center put out a general invitation for three months in their electronic newsletter that was circulated in February, March and April of 2016. Initially 37 people responded that they were interested in serving on the working group. A few others joined as the meetings progressed. The first meeting was held on March 22, 2016 with 18 individuals in attendance and five others participating via phone. Since that first meeting, meetings were held on April 14th and 24th; June 2, 13th and 28th; July 12th and August 2nd. Meetings varied in attendance but we had 35 active participants over the course of the six months that we met.

A list of the members of the working group are listed in Appendix B.

Review Procedure/Common Recommendations

A matrix of the recommendations from the three reports was created using 16 subject areas identified in the reports. These included:

1. School Safety Planning
2. Information Sharing Agreements
3. Awareness Training
4. Mental Health
5. Discipline
6. Prevention
7. Protection & Security
8. Threat Assessment Guidelines
9. Threat Assessment Process
10. Threat Assessment Training
11. Threat Assessment Documentation
12. Recovery
13. Colorado School Safety Resource Center (CSSRC)
14. Colorado Attorney General's (AG) Office & Safe2Tell
15. Law Enforcement
16. Additional Recommendations

The RWG found that only five recommendations were common to all three reports and the working group agreed with all five:

1. Schools should utilize climate surveys.
2. There should be written agreements (memoranda of understanding or MOUs) between school districts and law enforcement agencies about information sharing.
3. School staff should be versed in Family Educational Records Privacy Act (FERPA) and the fact that FERPA does NOT prevent reporting on a safety situation.

4. Districts should utilize the 11 questions of the U.S. Secret Service in their threat assessment process.
5. Schools are encouraged to promote Safe2Tell.

Climate Surveys – These instruments gauge the conditions within a school as perceived by students. However, climate surveys will necessitate resources to obtain a survey and time for staff/students to administer and complete the surveys as well as staff time to analyze the results. Once the results are analyzed, resources to address the challenges will probably be necessary at most schools.

The committee also felt that climate surveys should be conducted for staff and parents. There is a toolkit on the websites of the Colorado Department of Education, the Colorado Education Initiative and the CSSRC that outlines available climate surveys, intended target audiences as well as the cost, if they are not free.

Information Sharing Agreements/MOUs – The committee agrees that there is a need for information sharing agreements between districts and their emergency responders and community mental health providers. These agreements need to be prepared by the district's legal counsel with specific training for those responsible to carry out the agreements.

FERPA - Training school staff in Family Educational Rights & Privacy Act and the exceptions to FERPA when school safety is an issue, will also necessitate resources for training materials, training time and personnel with expertise to conduct the training. The CSSRC has released an online course entitled, "Making Referrals to Your Threat Assessment Team" designed for all school staff to know when it is appropriate to refer a student to the threat assessment team, to encourage staff to report, and to address the exception to FERPA in the case of school safety. Even with the utilization of this no-cost online option, time is necessary for school staff to complete the course.

Eleven Questions of the Secret Service - To address the fourth common recommendation, the district's policy and/or procedures for threat assessment need to be created in line with the current best practice recommendations which are to utilize the work of the U.S. Department of Education and the U.S. Secret Service. If districts are not currently using a process that includes these best practices with the 11 questions of the US Secret Service, they will need to take the time to create their policies and or procedures and train staff in how to conduct their threat assessment process. The CSSRC has been providing a template when conducting these trainings across the state at no-cost since the Center's inception and will continue to provide this service to schools.

Promotion of Safe2Tell - Schools need to find the time to promote Safe2Tell. Fortunately, with SB 16-193 beginning on June 30, 2017, Safe2Tell materials will be available to all schools in Colorado at no-cost to the schools. However, time for training students will still be necessary.

All Other Recommendations Covered in Any of the Three Reports

A chart that summarizes all the topics reviewed and the committee's responses to the recommendations can be found in Appendix A.

1. **School Safety Planning:**
   a. **District-wide School Safety Planning Team -** The committee agreed with this recommendation for a district-wide school safety planning team suggesting that the "district defines who that will be based upon authority and knowledge needed." As defined in CSSRC 'Comprehensive School Safety Planning' – "This team does the safety planning for the entire district/may also be trained to respond to individual schools as part of the District Crisis Response Team. Members of this team should also be prepared to provide, through training or contracting, both ongoing building safety assessments as well as assessments after crises."

   Naturally, the scale of this team will depend upon the size and needs of the district.   Some suggested team members could include: safety & security directors; district legal advisor; administrators; school law enforcement professionals; mental health professionals; athletic director; those with knowledge of the buildings and their mechanical systems; school medical personnel; director of transportation; special education director; director of nutritional services; administrator from learning services and others as appropriate. Best practice would be to include community emergency responders on this team at appropriate times when preparing for community-wide emergencies. These partners might include personnel from: law enforcement, juvenile justice, fire, EMS, community mental health agencies, parents, victim advocates and county emergency managers.

   Resources needed: Increased resources of time, money and necessary safety items/modifications as identified by this team (i.e. locks for classroom doors, radios, retrofitting for a secure front entry, etc.) Also, this would include planning time for team members to develop policies (substitutes during the working groups), procedures, standards and templates for training. Additionally necessary are funds for training programs, stipends for staff to attend planning meetings and training; an FTE to monitor compliance with the training requirements; and perhaps a tracking tool for compliance monitoring.

   Suggested assistance: For rural schools, the team may be staffed by professionals from the BOCES and/or smaller districts working together to staff a team. Larger front-range districts have volunteered to "mentor" smaller rural districts in their school safety efforts. Initially, this could be arranged through the Colorado School Safety Resource Center.

   Charter schools are encouraged to utilize the services of their umbrella district or the Charter School Institute to create this consulting team.

   Schools can also utilize the services of the Colorado School Safety Resource Center to provide the consulting services that a district-wide team would be providing.

   This district-wide school safety planning team would serve as a consulting body to school-based safety teams, if the district has such teams. In large districts, school-based teams

would provide similar site-specific services that a district-wide team would provide to all schools in a smaller districts.   This district-wide team would have the responsibility of completing the school safety accreditation report required by CDE.

b. **Multi-tiered planning & accountability for prevention and psychological services** - The committee agreed that districts/schools need a planning team for prevention and psychological safety efforts. This team should be comprised of district/school personnel including administrators, teachers and mental health professionals as well as members of the community mental health agencies when possible. When appropriate, parents and students could be invited to be part of the team. This team will develop a tiered system of supports for behavioral health services using the Response to Intervention (RTI) model of Tier I universal services; Tier II targeted services; and Tier III intensive services as needed.

These services not only assist a district in satisfying the health and physical education standards of the Colorado Model Content Standards, but research shows that by attending to the social/emotional well-being of students and "positive school climate it is predictive of or associated with achievement on academic tests, school success, effective violence prevention, students' healthy development and teacher retention." ([Cohen, et al Teachers College Record Volume 111, Number 1, January 2009, pp. 180–213. Copyright © by Teachers College, Columbia University, 0161-46812009](#))

It is recommended that schools utilize existing data including discipline and attendance data as well as climate surveys to prioritize behavioral health areas to be addressed. These areas of concern may include bullying prevention, Positive Behavioral Interventions & Supports (PBIS), substance abuse prevention, suicide prevention, threat assessment, knowledge of community resources including Safe2Tell and other topics as evidenced by the data.

Resources needed: Increased resources of personnel, time and training would be necessary. This would include planning time for team members to review data, identify areas of concern and possibly write policies and procedures for the district/schools. Funds for training programs, stipends for staff to attend planning meetings and trainings; substitutes for teachers needing the training and increased professional development time may be necessary along with curriculum (evidence-based when possible) and outreach materials. Students will also be involved in appropriate trainings and this will require additional time and training resources. Districts will need at least one FTE to oversee these programs.

It is recommended that this team include the means to evaluate all trainings and curricula for implementation fidelity and reliability.

Suggested assistance: For smaller districts, an FTE in the BOCES might be able to coordinate for all the BOCES schools in that area as well as provide mental health services as many of our rural schools only have mental health services on a very limited part-time basis.

The CSSRC is available to provide resources and possibly trainings for districts/schools on many of the topics where schools might identify knowledge gaps.

c. **Ongoing accountability and monitoring of prevention efforts** - The committee recommends that schools/districts perform ongoing accountability and monitoring of prevention efforts to the best of their ability with data already being collected by the school/district. This might include tracking the staff who attend trainings on prevention, using climate surveys already implemented by the school/district to see if the programs produce the positive results anticipated, using discipline data to track incidents of behaviors of concern to see if there is improvement, etc.

Schools are encouraged to use evidence-based programing but with resources at a minimum, this should not be a requirement.

Resources needed: Resources will be needed for a team to monitor fidelity of implementation and to evaluate the programs to the best of a school's/district's ability with the personnel/budget available to the district**.**

d. **Ongoing accountability and monitoring of physical safety efforts** - It would be helpful for schools to have a baseline of what is required by state statute. Beyond adherence to the Safe Schools Act, the Colorado Association of School Boards (CASB), for those districts that are members, is the best source of information on the safety requirements by which schools must abide. If a state agency had an inclusive list of all the safety requirements a school is required to complete, every school could use this list, thereby eliminating duplicative efforts but at the time of this writing, no such list exists.

Resources needed: A team will be necessary to conduct the community/building assessments, track the results and the steps necessary to fill the gaps discovered.

Suggested assistance: There are a number of assessment tools available at no charge to schools from a variety of sources: National Association of School Psychologists (NASP); Crime Prevention Through Environmental Design (CPTED); U.S. Department of Homeland Security; National Clearinghouse for Educational Facilities; and Texas Center for Educational Facilities. Schools can see the CSSRC website on "Vulnerability Assessments" for more assistance.

Assistance can also be requested from the district's county emergency manager; local law enforcement; and the CSSRC.

e. **Ongoing accountability and monitoring of psychological safety efforts** - The committee agrees with this recommendation and sees the need for ALL staff to have awareness training in identifying students who may need additional psychological supports. Behavioral health professionals need ongoing training and supervision so that they can handle students who have faced a crisis. They will also need to be trained to assist in the short and long term psychological recovery for any students facing an emergency that occurred either at the school or in the community which affects the student's ability to function in school.

Resources needed: These will include funds for programs, materials and alternative staff while planning and training is taking place. Time for staff training and preparation, possibly technology depending upon the district and the chosen courses and means of tracking and

evaluating training and program effectiveness. A means to track students who have had an assessment including all of their behaviors of concern and the services provided will also be necessary. This may include a modification to existing student tracking systems like Infinite Campus, SWIS, or any other tracking system already in use in the district. Some districts may need an additional FTE to manage the tracking.

When possible, schools should use peer-reviewed, evidence-based programs and at the very least, programs with some credible research behind them with ongoing review. When research based programs are not available, districts will need to trust their professionals to adapt existing programs to the needs of their students.

It is recommended that this team has the means to evaluate all trainings and curricula for implementation fidelity and reliability.

Suggested assistance: The CSSRC has a new, no-cost online course on "Referring Students to the Threat Assessment Team."

f. **National Incident Management System (NIMS) requirements, training sessions, drills and exercises -** The committee agrees that schools have an obligation to comply with the NIMS requirements as outlined in state statute and the Colorado position paper that followed the NIMS legislation. As stated in the position paper, the two courses identified are recommended for those staff members that are either part of the school/district safety planning teams or have an incident command role in an emergency. The Colorado NIMS School Response Framework based on the position paper can be found in Appendix C.

    Resources needed: Utilizing the position paper produced after the Colorado NIMS legislation was passed, resources necessary to satisfy all eight steps include time for training of staff and possibly substitutes so that teachers can attend. Some education associations have insisted that teachers be paid for the time it takes to complete the online courses as suggested by the NIMS legislation. Also needed to satisfy the position paper are time to update emergency plans, create memoranda of understanding with community partners, conduct and debrief drills, inventory equipment annually and track the schools'/districts' compliance with these items.

    Suggested assistance: The courses are offered from FEMA for free online, the Colorado School Districts Self Insurance Pool will also assist member school teams in completing the courses in a classroom format.

g. **Resource mapping -** The committee agrees that resource mapping is an important exercise to know what programs are being utilized to address concerns in a school. However, staff with the authority to make curriculum decisions need to be available to oversee this process including using data to make decisions, choosing effective programs and then implementing the programs with fidelity. Resource mapping may be an appropriate component of the school's unified improvement plan.

    Resources needed: Schools need key personnel with the authority and resources to oversee this process. Beside the planning time necessary, resources to gather data, locate or

purchase curricula and track the fidelity of the implementation and evaluate the results are also necessary.

Suggested assistance: There are tools available to assist schools including the PBIS "Working Smarter Not Harder" checklist and resource mapping tools from the CSSRC.

h. **Healthy Kids Colorado Survey -** The committee fully recognizes the value of having the statewide data on the topics covered by the HKCS for detecting and responding to negative trends in student behavior with prevention and intervention strategies and the data necessary for obtaining grant funding. However, the committee also recognizes that participating in the survey is ultimately the decision of each district. It is hoped that districts would consider participating and since this survey is conducted every two years, districts could schedule this at times opposite any other surveys they might be utilizing. Districts also need to be aware that they have the option to customize the last 15 questions of the survey and ask additional questions of their choice such as culture and climate questions.

Resources needed: Although there is no cost to schools willing to administer the HKCS, any surveying of students requires time to prepare for the administration, time for students to take the survey and time to analyze the data and report back to appropriate personnel. Once any negative trends are identified, schools would need resources to address these issues.

i. **Climate surveys** – <u>One of the five common recommendations</u>. See page 4 above.

j. **Ongoing accountability** - The committee supports this recommendation for ongoing accountability and monitoring of prevention and psychological safety efforts, based on the district's vision and priorities. The committee also agrees that the district needs to be accountable for programing.

Resources needed: Trained personnel with the necessary time it takes to monitor accountability would be necessary.

k. **Policies for information sharing -** The committee agrees that there is a need for information sharing agreements between districts and their emergency responders and community mental health providers.

Resources needed: These agreements would need to be prepared by the district's legal counsel with specific training for those responsible to carry out the agreements.

l. **Policies for threat assessment -** See section 8 "Threat Assessment Guidelines" below.

m. **Policies for error review –** The committee agrees that it would be helpful to have an outside agency reviewing all policies and procedures connected to school safety.

Resources needed: Resources to support hiring an outside agency.

Suggested assistance: Districts may rely upon community emergency responders to review policies and procedures as well as entities such as the Colorado School Safety Resource Center**.**

2. **Information Sharing Agreements:**
   a. **Agreements between schools and law enforcement (memoranda of understanding/MOUs) –** One of the five common recommendations. See page 2 above.

   b. **Agreements between schools and community mental health providers -** The committee also agrees that there is a need for information sharing agreements between districts and their emergency responders and community mental health providers.

      Resources needed: These agreements need to be prepared by the district's legal counsel with specific training for those responsible to carry out the agreements.

3. **Awareness Training**:
   a. **Awareness training for ALL school community-** The committee agrees with this recommendation that **all staff** should be trained in awareness for warning signs of troubled youth, identification of threats, awareness of child abuse and reporting requirements, awareness of signs of depressed or suicidal students, identifying drug and alcohol misuse, harassment and bullying, self-injury, proper use of restraints and other topics that require reporting. Training should also include when to report and the importance of reporting in a timely manner.

      Resources needed: Staff and student training takes time and resources including personnel with the knowledge to conduct the trainings. Many schools in Colorado have very limited numbers of professional development hours which makes awareness training difficult to achieve. To keep the messages prominent for students, posters and other materials will be necessary.

      Suggested assistance: The Colorado School Safety Resource Center has a no-cost, online training entitled, "Making Referrals to Your School's Threat Assessment Team." Safe2TTell is a valuable resource and if schools are utilizing S2T, they need to be sure that students are being taught how/when to use it with frequent updates. Other available reporting lines such as the National Suicide Prevention Lifeline should also be resources of which students are made aware.

   b. **Multiple means by which to report -** The committee also agrees that students and staff need multiple means by which they can report others of concern.

      Resources needed: Student training takes time and resources**.**

      Suggested assistance: Fortunately, materials will be available from Safe2Tell to assist with this training.

c. **FERPA training for staff** – <u>One of the five common recommendations</u>. See Page 4 above. This awareness training for staff needs to include information on FERPA so that all staff understand that FERPA does NOT limit their reporting when there is a safety concern.

d. **FERPA training for all students –** The committee agrees that students should be given information on reporting peers of concern and encouraged to report but that students do not need to understand FERPA.

e. **FERPA training for all parents** - The committee agrees that parents should be given information on the topics above as well as FERPA information in the student handbook. To expect schools to "train" all parents on awareness topics would be a huge undertaking.

f. **Annual school safety statute training with annual compliance reporting -** The committee felt that this was an unrealistic recommendation for ALL staff given the limited professional development time available. However, administrators and those whose jobs require knowing safety statutes should be kept updated as necessary.

   Resources needed: Time for training and the professionals with the expertise to conduct the trainings.

4. **Mental Health:**
   a. **Increase staffing for school mental health professionals -** The committee agrees that having the nationally recommended ratios of mental health professionals would go a long way to providing the kinds of services we would all like to see available to our students.
   At the time of this writing, the recommended ratios and the Colorado ratios were as follows:

	Nationally Recommended Ratios	Colorado Ratios
School Psychologists	**1:500-700**	**1:1,273**
School Social Workers	**1:250**	**1:2,738**
School Counselors	**1:250**	**1:400**

   Resources needed: Districts/schools are providing these resources to the best of their abilities at the current time and without additional financial support and a pool of available professionals, most districts are not able to improve these ratios.

   b. **Teacher education on behaviors they handle vs referrals to mental health -** The committee agrees that staff should be trained on what mental health resources are available and how best for staff to make referrals to these resources. This will be accomplished however it

best works within the framework of a district with the resources available. Often schools weave this into existing trainings.

   Resources needed: Training takes time and appropriate personnel to conduct.

c. **Ongoing professional growth for mental health professionals -** Most districts are already doing this to the best of their ability.

   Resources needed: Training takes time and appropriate personnel to conduct. Mental health professionals should attend training of cutting edge information and this often requires conference fees, travel and either substitutes or perhaps stipends if not on district time.

d. **Team mental health professionals with administrators and partner with parents to secure releases of information for students at-risk -** The committee agrees and this is being done to the best of the districts' abilities. Often times the most difficult part is getting guardians/caretakers to release information about their student from outside professionals to the school.

e. **Adequate training of community mental health providers –** The committee agrees that this is being done to the best of the districts' abilities.

   Resources needed: Time necessary for joint meetings/trainings.

5. **Discipline:**
   a. **Clear policies, procedures and legal updates on discipline for administrators** - The committee agrees that there should be clear policies, procedures & legal updates on discipline for administrators.

      Resources needed: Time and professionals necessary for adequate training of appropriate school personnel. The Colorado Attorney General's office periodically provides a School Discipline Manual which outlines all statues related to school discipline. An updated version is expected for the 2016-17 school year and this will be most helpful to school administrators.

   b. **Ongoing education of students about behavioral expectations -** The committee agrees that students should be taught expectations of their behavior with periodic updates of the student code of conduct. For schools utilizing PBIS, the model recommends reminders twice per year.

      Resources needed: Time necessary for student training.

   c. **Clear direction to teachers on behaviors they handle vs. referrals -** The committee agrees that adequate training of all school personnel is necessary about policies and procedures of student discipline. Staff should be taught the expectations and skills to handle minor discipline issues in their classrooms and when to refer to administration. Staff should also be made aware that discipline may be a tool used as an interruption in the pathway to

violence and that very careful monitoring of student discipline may be required in individual cases. Staff should maintain a balanced approach between discipline and support.

Resources needed: Time and personnel necessary to instruct teachers in classroom management and expectations.

d. **Monitoring and evaluating the effectiveness of school discipline -** The committee agrees that schools should be monitoring their discipline data to watch for minority and special education students' disproportionality and to evaluate the effectiveness of their discipline strategies. Utilizing their campus record keeping system (SUIS, Infinite Campus, etc.) to assist with this is an option that most schools are utilizing.

Resources needed: Time and personnel to track and analyze the data.

e. **Collaboration between mental health & discipline personnel** - The committee agrees that there always needs to be collaboration between school administrators responsible for discipline, special education directors and mental health providers in the school. Unfortunately, many of our rural schools have limited access to mental health providers that are shared between districts across wide geographic areas. This again underscores the need for many more mental health providers in our schools across the state. Therefore, schools are accomplishing this to the best of their ability with the resources they currently have.

Resources needed: Once again for many of our schools with limited resources, additional personnel and time to meet are necessary to adequately accomplish this.

f. **Ongoing professional development for those responsible for discipline -** As the research changes about what works best for student discipline, the committee agrees that there needs to be ongoing professional development for those staff responsible for student discipline. All staff also have to be aware of the policies and proper procedures for student discipline. This includes training by districts' legal counsel to be sure that school staff are adequately addressing the rights of students particularly those in special education classes.

Resources needed: Appropriate personnel to conduct the professional development and time for staff to attend. As with the mental health providers, staying abreast of the current research in this field may require attendance at national conferences with the added resources necessary for staff to attend.

g. **Utilization of discipline as a possible interruption in the pathway to violence** - The committee agrees that adequate training of all school personnel is necessary about policies and procedures of student discipline. Staff should be taught the expectations and skills to handle minor discipline issues in their classrooms and when to refer to administration. Staff should also be made aware that discipline may be used as an interruption in the pathway to violence and that very careful monitoring of student discipline may be required in individual cases.

Resources needed: Time and the appropriate personnel to train school staff responsible for student discipline as well as the general population of staff who interact with students.

Some basic understanding of threat assessment and a staff member's possible role in monitoring student behavior to interrupt the pathway to violence should be part of staff training.

6. **Prevention:**
   a. **Districtwide school safety team to handle prevention -** The committee agrees that there should be a district-wide team to handle prevention or it may be the responsibility of the district-wide safety team.

      Resources needed: This team needs administrative support and a budget in order to carry out prevention strategies.

   b. **School site safety teams to handle prevention** - The committee also agrees that school site teams that interface with the district prevention teams would be most effective.

      Resources needed: These school-based teams also need administrative support to make decisions about prevention strategies in their buildings and funds to purchase prevention materials are all necessary to have a successful program.

   c. **Data collection to set priorities and monitor efforts -** The prevention teams need to monitor prevention work and be trained in analyzing the data to evaluate the effectiveness of the programs/strategies selected.

      Resources needed: Time to meet for planning and data analysis as well as resources to assist when necessary.

   d. **Increased awareness to staff of indicators of behavioral and emotional concerns -** The committee agrees with this recommendation that all staff should be trained in awareness for warning signs of troubled youth, identification of threats, awareness of child abuse and reporting requirements, awareness of signs of depressed or suicidal students, identifying drug and alcohol misuse, harassment and bullying self-injury, proper use of restraints and other topics that require reporting. Training should also include the importance of reporting in a timely manner. Additionally, all professionals that work in the building (i.e. itinerant mental health professionals, etc.) should be trained.

      Resources needed: Once again, staff training takes time and resources including personnel with the knowledge to conduct the trainings. Many schools in Colorado have very limited numbers of professional development hours which makes awareness training difficult to achieve.

7. **Protection & Security: -** The committee agrees with all of the following safety precautions with some minor adaptations as noted. These precautions should be adopted and carried out to the best ability of a district/school based on their emergency operations plans and resources available. Schools are reminded to include plans for staff and students with special needs.
   a. **All security staff trained in nonviolent de-escalation –** Agreed.

Resources needed: Personnel to act as school security and adequate training by appropriate professionals. Many of our rural schools do not have the resources to have dedicated school safety professionals.

b. **Security staff trained in laws, policies and procedures about student searches –** Agreed.

   Resources needed: Training time and experts to conduct the trainings.

   Suggested assistance: CSSRC has a number of free, online courses for school security staff.

c. **Consolidate school safety policies for ease of training and use –** Agreed.

   Resources needed: District or school team needs time to consolidate polices.

d. **Security staff become active members of the Colorado Association of School Safety Law Enforcement Officers (CASSLEO) –** At least one district professional involved in security should be represented at CASSLEO.

   Resources needed: Time/coverage for attendance at meetings.

e. **All security staff trained in physical security –** Agreed.

   Resources needed: Time for training and experts to conduct the training.

f. **Trained security directors supervise security staff rather than educational administrators supervising –** The committee believes this should be a partnership between security staff and school administrators based on the district's contractual agreement with security personnel and the district's resources.

   Resourced needed: Time for meetings to collaborate.

g. **Security directors in charge of SROs.** The committee was advised that the SROs will always be supervised by their local police or sheriff's department. Therefore the committee suggests that the security supervisor serves as a liaison to the SRO program in the school.

h. **Student training on building security** - The committee agrees that all staff and students should be trained in the fundamentals of building security (access restriction, not propping doors, necessity of having drills, proper conduct during drills for the safety of everyone, etc.) This training must be designed to be developmentally appropriate according to developmental age and any student disabilities.

   Resources needed: Time for student training.

i. **Building assessment conducted by a qualified outside team every three to five years -** The committee agrees that building assessments should be conducted at least every three years by someone qualified to assess the building and surrounding community.

Resources needed: If the school/district accesses a no-cost resource for this assessment, the time of the school personnel involved and then the cost of suggested upgrades would be the resources necessary.

Suggested assistance: It is suggested that schools can partner with local law enforcement, regional emergency managers and the School Safety Resource Center to accomplish this recommendation with no cost to the school. It was suggested that the CSSRC provide a checklist to any school requesting it so that school staff can annually assess their building between assessments done by a professional assessor.

j. **Classroom doors that lock from the inside** – Agreed. Since, to date, no students have been lost in school attacks when in lock-down behind a locked door, this is a vital element of school safety. Schools in Colorado also have fire code regulations that must be met by January 1, 2018 which include doors that are always latched in case of blow-out from a fire. Many schools are replacing classroom doors, which lock with a key from the outside, with doors that latch and can be easily locked from inside the classroom in case of an active shooter.

Resources needed: Many schools are struggling to replace doors with exterior locks with new hardware that locks from within and does not require a key. Estimates are that new locks cost approximately $300/door.

k. **Security staff stagger schedules for increased protection** – Agreed.

l. **All staff trained in physical security, especially secured doors** – Agreed.

Resources needed: Time for training and personnel to conduct the training.

m. **All exterior doors secured** – Agreed.

Resources needed: Training for all staff and students as to the importance of this.

n. **When possible, updated camera equipment with consistent time stamping** – Agreed.

Resources needed: Many of our schools do not have resources to even have cameras.

8. **Threat Assessment Guidelines:**
   a. **District policy for threat assessment to include: authority to conduct; capacity to conduct; integrated and interagency system and; awareness training for all -** The committee agreed that there should be a superintendent's or board policy/regulations about conducting threat assessments with staff assigned to the threat assessment team and this be included as a duty in the lead team members' job descriptions as a further protection for staff assigned.

   Resources needed: Policy reviewed by district legal counsel and school board. This recommendation requires personnel, time and training with some schools requiring an increased FTE to fulfill this requirement. Awareness training covered above.

Suggested assistance: CASB is working on a policy and samples can be requested from the CSSRC.

b. **Staff assigned to threat assessment teams –** Agreed. See 8a.above.

c. **Three person team trained and updated every 2 to 3 years -** The committee agrees on a minimum three person trained team to include persons with the following perspectives: an administrator with the authority to initiate discipline, a mental health professional (i.e. counselor, school psychologist, social worker, behavioral interventionist, or other special services provider) and a law enforcement officer when appropriate. The committee agrees that team members need to be trained when initially employed and retrained every 2 to 3 years.

Resources needed: Schools/districts will need to consult with trained, appropriate community partners if they do not have the equivalent personnel in district. All team members need to be appropriately trained with best practice information and materials. At the time this committee met, the U.S. Department of Education recommends the materials prepared by their office and that of the U.S. Secret Service. Training takes time and expertise to be sure all team members have the knowledge and skills necessary to be part of the team.

Suggested assistance: Rural schools are encouraged to get this team support from community members if there are not equivalent personnel in their school/district. A special education staff member or someone with special education law expertise needs to be consulted when the student at-risk is in special education. Other team members will vary based on the individual student and staff who have knowledge and a relationship with that student. The Colorado School Safety Resource Center continues to train school teams across the state at no-cost to the schools.

d. **District level subject matter experts (SME) or review team identified for consultation, training and/or participation in assessment or planning as needed -** The committee agrees that district level SMEs or review team identified for consultation, training and/or participation in assessment or planning should be utilized when requested.

Resources needed: Again this recommendation requires personnel, time and training with some schools requiring an increased FTE to fulfill this recommendation.

Suggested assistance: For rural schools this function will be available as resources allow and might be served by their BOCES, a larger neighboring school district, the school's legal counsel, CASB, the Colorado School Safety Resource Center or other entities not here identified.

The district's process should specify how they will accomplish the following:

e. **Consistent process across district schools –** The committee agrees that schools within a district should be using a process based on consistent policies/procedures. This allows for cross-training and for trained district personnel to assist in other buildings.

   Resources needed: All the threat assessment recommendations will require time for personnel to meet to write policies/procedures, train team members and time to hold threat assessment meetings. Since the recommendation is for a team consisting of an administrator with the authority to initiate discipline, a mental health professional and a law enforcement officer (when appropriate), these individuals need to be available either within the school/district or the community.

   Suggested assistance: If district members of a BOCES all use a process based on consistent policies/procedures, they too can cross-train and borrow personnel when necessary.

f. **Vortex of information established at each school -** A communications plan that includes a conscious decision as to where the information is housed and who may have access according to the district's policy/procedures.

   Resources needed: Personnel at each school to collect the information and document the process.

g. **Threat assessment guidelines or manual district/school create a threat assessment manual –** The committee agreed that every district needs guidelines for their district's policies/procedures.

   Resources needed: Staff time to create the guidelines.

h. **Districts/schools install a validated threat assessment process** - Districts utilize current best practices for threat assessment. (At the present time that is the U.S. Secret Service and the U.S. Department of Education's Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates and The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States.)

   Resources needed: Staff must create/adopt a best practices template for their threat assessment process and establish their policies and procedures. Then all members of district threat assessment teams must be trained on these.

   Suggested assistance: There are a number of available templates that are based on the current best practices work. The CSSRC is available to provide a template when training district/school staff on how best to implement it.

i. **Vortex coordinator at each school** – The committee recommends a communications plan that includes a conscious decision as to where the information is housed and who may have access according to the district's policy/procedures.

j. **Use Infinite Campus as data base for threat assessments & to record safety plan** – See "m" below

k. **Document matters of public safety** – See "m" below

l. **Make information available to professionals needing access** – See "m" below

m. **Active notification to all professionals involved with student of concern-** Carefully document behaviors of concern according to the district's policies/procedures which should include the flow of information, who will have access to the records and why, confidentiality beyond those that have a need to know, tracking components of the support plan and responsibilities of school staff as part of the support plan. Each individual threat assessment is a unique situation and the process needs to reflect the necessary flexibility of the communications based on each situation.

   Resources needed: The resources necessary to accomplish this recommendation would be staff time. Some schools might need an additional FTE to track the threat assessments and the response/support plans.

n. **Use a validated risk assessment to build the safety plan for at-risk students -** Implement a support plan and carefully document all steps and persons responsible for actions of the plan. If the district has the resources to use a validated, school appropriate risk assessment to assist in designing the plan, that is preferred.

   Resources needed: Again the resources necessary to accomplish this recommendation would be staff time. Some schools might need an additional FTE to track the threat assessments and the response/support plans. Additionally, if the school chooses to use an appropriate, validated risk assessment they will either need resources to train staff or hire someone to conduct this. There are also implications around securing parent permission for utilizing a validated, risk assessment tool.

9. **Threat Assessment Process**

   a. **Team is convened with safety as the priority** – Agreed

   b. **Variety of information sources are utilized** – Agreed

   c. **Special education consideration and staff included in the process when appropriate** – Agreed

   d. **Interview student of concern** – Agreed

e. **Interview guardians/caretakers of the student of concern –** Involve them as/when appropriate. Secure a release of information for other professionals working with their child.

f. **Interview all witnesses** – Agreed

g. **Collect all data in behavioral terms** – Agreed

   Resources needed: The resources necessary to accomplish these recommendations listed above would be staff time. Some schools might need an additional FTE to track the threat assessments and the safety/support plans.

h. **Secure a release of information from parents of the student of concern for mental health services, if appropriate –** The committee agreed that a release of information from guardians/caregivers for mental health services, if appropriate, is ideal. Committee members pointed out that guardians/caregivers have the right to refuse to participate in the process or agree to the support plan.

   Resources needed: Schools still have an obligation to provide an education regardless of the guardian's level of cooperation. Schools then have the responsibility of educating the student in the most appropriate situation considering the safety of all. If a school insists on an outside mental health referral, the district will be obligated to pay for it if the parents refuse or have no insurance.

i. **All data evaluated using the 11 questions of the US Secret Service** - <u>One of the five common recommendations</u>. Agreed. District process aligned with their policies/procedures should incorporate the 11 questions of the U.S. Secret Service as a means to organize and evaluate the data.

j. **Countermeasures created commensurate with levels of concern** - Agreed. Support plan should carefully document the steps to be taken and the person(s) responsible for the actions and confirmation that the actions were completed. If guardians refuse to cooperate or fail to perform their countermeasures, this needs to be documented.

k. **Safety plan created for at-risk student** – Agreed. Support plan should carefully document the steps to be taken and the person(s) responsible for the actions and confirmation that the actions were completed. If guardians/caretakers refuse to participate in the plan, that must be noted with their signature(s).

l. **Safety plan created by Interagency Social Support Team -** Support plan should be created by the multi-disciplinary team responsible for carrying out the plan.

m. **Identify responsible school staff to implement safety planning steps –** Agreed. See "o" below.

n. **Identify safety planning steps for which the student will be responsible** – Agreed. See "o" below.

o. **Identify safety planning steps for which the guardians/caretakers of the student at-risk will be responsible** - Agreed. Support plan should carefully document the steps to be taken and the person(s) responsible for the actions, confirmation that the actions were completed or refusal (by guardians/caregivers) to cooperate with the plan and dates for the plan's review. Guardians/caregivers should sign-off on the plan regardless of their level of cooperation. The level of cooperation would be noted above their signature.

p. **Information vortex coordinator assigned to every student of concern to continue to seek out and evaluate the student** – Roles and responsibilities of those executing the plan should be specified in the support plan.

q. **Dates for safety plan review identified** – Agreed.

r. **District-level oversight of the process** – Agreed. As specified in the district's policies/procedures**.**

s. **Records maintained according to district policy** – Agreed.

t. **Reconvene the team when additional factors make that necessary –** Agreed. As specified in the district's policies/procedures.

u. **District office review by assigned individual or team –** Agreed. As specified in the district's policies/procedures.

v. **Records maintained at district level also** – Agreed. As specified in the district's policies/procedures.

    Resources needed: These commendations (i thru v above) require personnel, time and training.

w. **School/districts conduct an internal audit of their threat assessment process and report the findings to their school boards annually or biennially** - Carefully document behaviors of concern according to the district's policies/procedures which should include the flow of information, who will have access to the records and why, confidentiality beyond those that have a need to know, tracking components of the support plan and responsibilities of school staff as part of the support plan. Each individual threat assessment is a unique situation and the process needs to reflect the necessary flexibility of the communications based on each situation.

x. **Each at-risk student paired with an adult in authority to build a trusting and positive relationship -** While this would be ideal, the committee felt it was unrealistic.

Resources needed: A great deal of staff time including a person to coordinate and document the interactions.

y. **Formal debrief after every violent event** – Agreed. The committee believes this occurs at every school.

10. **Threat Assessment Training:**

   a. **All staff trained in awareness of violence and behaviors of concern** – Agreed and already covered in 3 above.

   b. **Emphasis on timely reporting of students of concern** – Agreed and already covered in 3 above.

   c. **Multiple avenues of reporting established for students, staff, parents and community** - Agreed. Increased awareness of Safe2Tell would be helpful in all schools.

   Resources needed: Now that Safe2Tell will have additional resources to supply to schools, this might be more easily accomplished. It will still require schools to have the time to conduct the trainings.

   d. **All TA members trained with periodic updates as specified in district policy** – Agreed.

   Resources needed: Again this recommendation requires personnel, time and training.

   e. **Training attendance of ALL participants documented** – Agreed. Tracking the training of ALL participants with your district's system.

   Resources needed: Some schools may need additional resources such as an electronic system and/or an FTE to accomplish this.

   f. **Law enforcement officers utilized in school/district TA teams should be trained with the team** – Law enforcement officers utilized in school/district TA teams should be trained using the district's policies/procedures and with district personnel, when possible.

   Resources needed: This recommendation requires personnel, time and training.

   g. **Teams should train or practice together** – The committee recommends that teams train AND practice together whenever possible.

   Resources needed: This recommendation requires personnel, time and training.

   h. **Case scenario practice is beneficial** – The committee recommends that case scenario practice be a required part of the training.

   Resources needed: This recommendation requires personnel, time and training.

   i. **Face-to-face training can be augmented with support documents but not replaced with them** – Agreed.

Resources needed: Time and expertise to create the documents.

j.   Support documents should be available on the district's website – Agreed.

   Resources needed: Time and expertise to create the documents.

k.   Dedicated training time for threat assessment topics alone – The committee felt this recommendation was too prescriptive for districts and instead recommended dedicated training time for threat assessment topics.

   Resources needed: This recommendation requires personnel, time and training.

The committee agreed that all the following should be included in the training in some form. Please see each item for any special circumstances identified by the committee. The necessary resources for all the components is listed below "gg."

l.   History of school violence and lessons learned – Agreed.

m.   Clarity about WHEN to do a threat assessment – Agreed.

n.   Clarity about the team – Agreed.

o.   Six principles of the US Secret Service – Agreed.

p.   FERPA relevant exceptions – Agreed.

q.   The meaning of FERPA clearly communicated to staff, students and parents in district policy, manuals, codes of conduct and training – Agreed. In district policy, manuals, codes of conduct and information disseminated to staff, student and parents, FERPA should be clearly communicated. "Training" of parents is not realistic but providing the information is.

r.   Training for awareness of appropriate use of warning signs – Agreed. See #3 above.

s.   Key findings of the US Secret Service – Agreed.

t.   Awareness of avenger violence – Agreed.

u.   How to evaluate written materials – Agreed.

v.   Train on correctly coding threat i.e. direct, indirect and veiled, etc. – Training on threats as identified in the district's policies/procedures.

w.   Weapons question asked of student and parents – notation of "none known" if unable to reasonably ascertain the presence of weapons – Documentation according to the district's policies/procedures.

x. **Train for evaluation of information. If required to identify level of concern, examples and explanations should be provided** – Agreed.

y. **Train in a validated instrument using a one-on-one cognitive behavioral standard -** Committee recommends that schools use best practices including an instrument that reflects the current best practices in the field. The district will need to decide based on the policy/procedures the best way to train personnel, who needs to be trained and the length of the training. Scenario based training is recommended.

z. **Train all teachers and staff -** The committee agrees with this recommendation that all staff should be **trained in awareness** for warning signs of troubled youth, identification of threats, awareness of child abuse and reporting requirements, awareness of signs of depressed or suicidal students. Those responsible for conducting the threat assessments need the specialized threat assessment training.

aa. **Additionally, train principals, assistant principals, counselor and SROs in a minimum one-day hands-on scenario curriculum** - Training conducted as outlined in the district's policies/procedures.

bb. **Teach the identification and coding of behaviors i.e. normal, boundary probing, attack related or attack** – Training conducted as outlined in the district's policies/procedures.

cc. **Use of the 11 key questions of the US Secret Service reviewed** – Agreed. See page 2.

dd. **Teach creation of effective intervention plans commensurate with level of concern and suggestions for monitoring** – Agreed.

ee. **Train for each step of the district's process in addition to reviewing the documentation form** – Agreed.

ff. **Use case studies for tabletop practice in training** – Agreed.

gg. **Participants should evaluate the training** – Agreed.

Resources needed: For all items under "10. Threat Assessment Training," districts will need personnel, time and expertise to establish the district's policies and procedures and to prepare and conduct the training.

Suggested assistance: The Colorado School Safety Resource Center is available to assist any district/school with consultation and training for threat assessment.

11. **Threat Assessment Documentation:**
The committee agreed that all the following should be included in the training in some form. Please see each item for any special circumstances identified by the committee. The necessary resources for all the components is listed below "l."

a. **Review all forms to be sure they guide less experienced school personnel through the process** - The committee recommends that all school personnel who will be using the threat assessment process are trained according to the policies/procedures of the district. This should include documentation of all participants at all trainings.

b. **Single prompts on forms with sufficient space for clarification and/or evidence** – Agreed.

c. **Section listing all recommended data sources including social media in accordance with district's legal counsel** – Agreed.

d. **Documentation forms need to include a step to evaluate all data sources using the SS11 questions before any decision making or intervention planning** – Agreed.

e. **Intervention plan needs to be: detailed, persons responsible identified and dates of review included** – Agreed.

f. **All action plans should include monitoring of the student** – Agreed. According to your response/support plan.

g. **Points of contact identified preferably by a mental health professional** – Agreed. According to the roles and responsibilities as outlined in the district's policy/procedures for threat assessment.

h. **Daily or weekly check-ins required with examples provided -** If required by a specific student's response/support plan.

i. **Document check-in** – Agreed. According to your response/support plan**.**

j. **Supply consequences and adhere to them if check-ins are not completed** – Agreed. According to your response/support plan.

k. **Cases classified as: currently active & under review; active with proactive monitoring of behavior and countermeasure; inactive with reactive monitoring as needed** - Or as specified in your district's policy/procedures for threat assessment

l. **Cases noted in the electronic record keeping for individual students** – Agreed. According to your district's policy/procedures for threat assessment.

Resources needed: For items under "11. Threat Assessment Documentation," districts will need personnel, time and expertise to establish the district's policies and procedures, to prepare and conduct the training, to implement the response/support plans and to document all activities related to each threat assessment. Additionally, some districts might need resources for an electronic record keeping system and/or personnel to track the information.

Suggested assistance: The Colorado School Safety Resource Center is available to assist any district/school with consultation and training for threat assessment.

12. Recovery:

    a. **Mental health recovery plan for long-term support and follow-up for students, faculty and staff –** Agreed.

        Resources needed: Many districts will need additional resources for mental health support for students at-risk.

    b. **Training of staff to handle the recovery phase –** Agreed.

        Resources needed: Again this recommendation requires personnel, time and training.

    c. **Staff trained in suicide assessments –** Agreed.

        Resources needed: School mental health staff need specialized training to conduct suicide assessments and all others need awareness training that includes identifying risk factors and warning signs in students that may be depressed and/or suicidal. Specialized training takes expertise and materials. All training takes personnel and time.

    d. **Debriefing of staff, students and first responders after events –** Agreed.

        Resources needed: Debriefing takes trained staff and time devoted to doing this appropriately.

13. Colorado School Safety Resource Center:

    a. **Convene a work group to examine threat assessment and provide guidance for training and documents to schools -** Agreed. The CSSRC periodically meets with school district personnel responsible for threat assessment in their districts and shares the lessons learned in ongoing training of other districts. Likewise, the CSSRC is in contact with experts across the country so that policies and procedures in Colorado are aligned with national best practices. The Center does have a best practices template that they make available to districts during threat assessment training.

        Resources needed: District personnel have volunteered their time to participate in these discussions and share their experiences with threat assessment along with tools developed in their districts.

    b. **Extract the common variables in the threat assessments used successfully in Colorado schools** – Agreed. Schools in Colorado with which the Center has worked on threat assessment are all using common components. Additionally, CSSRC staff are communicating with researchers investigating the common variables in Colorado districts' threat assessment processes and the effectiveness of the tools being utilized.

    c. **Define the similarities and differences in responsibilities of the Multi-jurisdictional Threat Assessment Team and the Interagency Social Support Team in the threat assessment and support process -** The Center encourages districts/schools to collaborate and train with community partners in their threat assessment process.

d. **Audit any school-district for proper use of their "validated" threat assessment process -** The Center is available to any district/school to assist in the development of the policies/procedures for threat assessment as well as training on their procedures and consultation on any threat assessment conducted.

e. **Certify principals, assistant principals, counselors and SROs in threat assessment at least once every three years -** CSSRC is not a regulatory agency and any attempt to have the Center "certify" school staff risks destroying the relationship of trust that has been built with schools districts who think of the Center as a resource to them. Center staff have always been available to review a district's threat assessment process and will work to create a checklist of best practice suggestions for threat assessment from the suggestions of the U.S. Secret Service and the U.S. Department of Education.

f. **Review all TA debrief reports and coordinate a working group to improve information sharing, threat assessment and systems thinking in school safety and violence prevention -** The CSSRC is always available to assist any districts/schools anywhere along the way in the process/procedures. This recommendation would require the consent of the districts. As stated in (13a) above, the Center does consult with other schools to improve information sharing, threat assessment and systems thinking in schools safety and violence prevention.

g. **Help districts establish an accountability system for ensuring schools follow their guidelines of retraining and membership of threat assessment and ISST** - Center staff will continue to be available to any schools to assist anywhere in the timeline of their threat assessment process. However, districts need to be accountable for staff training and documentation of that training.

14. **Colorado Attorney General's Office and Safe2Tell:**

a. **Statewide promotion of Safe2Tell –** One of the five common recommendations. Agreed. Legislation passed in the 2016 Legislative Session will provide the resources schools need to promote Safe2Tell.

b. **AG's office prepare an opinion on the application of FERPA to information sharing of schools with outside agencies** – Agreed.

c. **Annually update the Colorado School Violence prevention and School Discipline Manual –** Agreed. It is the committee's understanding that an update will be ready for the 2016-17 school year.

d. **Promote Safe2Tell in formal trainings: Skills practice; one-on-one feedback; and coaching –** Agreed.

e. **Advertise & promote S2T all year including during school breaks** – Agreed.

Resources needed: This committee does not know what resources the AG's office might need to accomplish all of the above recommendations.

15. **Law Enforcement:**

a. **Officer acting as part of a school-based threat assessment team should participate in the district training process or similar training –** Agreed. See Section 10 above.

   Resources needed: This would take coordination, time and training.

b. **Interview of the student of concern by law enforcement officer –** The committee recommends that this happen when appropriate but it will not be necessary in all instances. Interviewing by law enforcement when not necessary might contribute to an increase in ticketing of students.

c. **Interview the parents of the student of concern -** The timing of the notification and/or interviewing of the guardians/caretakers of the student of concern will depend upon the circumstances and needs to follow the district's policies/procedures.

d. **Consultation with the office of the district attorney –** When necessary according to municipal and state laws, as well as the district's policies/procedures and those of the local law enforcement agency and office of the district attorney.

16. **Other School Recommendations:**

From the reports –

a. **Schools create a continuous improvement model of error review committee –** The committee felt that this needs to be a district decision.

   Resources needed: Districts would need resources of time, personnel and either training or a consultant to fulfill this recommendation.

From the committee members –

b. **Training in higher education programs on school safety and emergency planning for all teachers, school mental health professionals and administrators –** Agreed.

c. **Training in classroom management in teacher education programs –** Agreed.

Appendix A: Summary of Topics Reviewed

Recommendations	Kanan/ Nicoletti	CSPV	Safe Havens	Disagreed	Agreed	Agreed w/ Modifications	Resources Needed	Reference
1. SCHOOL SAFETY PLANNING:								
District-wide school safety planning team	X				X		X	1.a
Multi-tiered planning & accountability for prevention and psychological services	X		X		X		X	1.b
Ongoing accountability and monitoring of prevention efforts	X				X		X	1.c
Ongoing accountability and monitoring of physical safety efforts	X				X		X	1.d
Ongoing accountability and monitoring of psychological safety efforts	X				X		X	1.e
NIMS Requirements, training sessions, drills and exercises	X		X		X		X	1.f
Resource Mapping	X				X		X	1.g
Healthy Kids Colorado Survey	X					X	X	1.h
Climate Surveys	X	X	X		X		X	Page 4
Ongoing accountability	X				X		X	1.j
Policies for info sharing	X	X			X		X	1.k
Policies for threat assessment	X	X			X		X	Section 8
Policies for error review		X			X		X	1.m
2. INFORMATION SHARING AGREEMENTS:								
Agreements between schools and law enforcement	X	X	X		X		X	Page 4
Agreements between schools and community mental health	X	X			X		X	2.b
3. AWARENESS TRAINING:								
All school community trained in at-risk signs from suicide, threats, substance abuse, child abuse & other issues that need reporting. Including how and when to report for staff, parents & students	X				X		X	3.a
Multiple methods of reporting	X				X		X	3.b
All staff trained in FERPA	X	X	X		X		X	3.c
All students trained in FERPA including inclusion in student manuals		X				X	X	3.d

Recommendations	Kanan/ Nicoletti	CSPV	Safe Havens	Disagreed	Agreed	Agreed w/ Modifications	Resources Needed	Reference
All parents trained in FERPA		X				X	X	3.e
Schools conduct annual training on all school safety statutes with annual compliance report		X				X	X	3.f
4. MENTAL HEALTH:								
Increase staffing for school mental health professionals	X				X		X	4.a
Teacher education on behaviors they handle vs referrals to mental health	X				X		X	4.b
Ongoing professional growth for mental health professionals	X				X		X	4.c
Team mental health professionals with administrators and partner with parents including releases of information for at-risk students	X		X		X		X	4.d
Adequate training of community mental health providers			X		X		X	4.e
5. DISCIPLINE:								
Clear policies, procedures & legal updates on discipline for administrators	X		X		X		X	5.a
Ongoing education of students about behavioral expectations	X				X		X	5.b
Clear direction to teachers on behaviors they handle vs referrals	X				X		X	5.c
Monitoring & evaluating the effectiveness of school discipline	X				X		X	5.d
Collaboration between mental health & discipline personnel	X				X		X	5.e
Ongoing professional development for those responsible for discipline	X				X		X	5.f
Utilization of discipline as a possible interruption in the pathway to violence			X		X		X	5.g
6. PREVENTION:								
Districtwide school safety team to handle prevention	X				X		X	6.a
School site safety teams to handle prevention	X				X		X	6.b
Data collection to set priorities and monitor efforts	X				X		X	6.c
Increased awareness to staff of indicators of behavioral and emotional	X				X		X	6.d

Recommendations	Kanan/ Nicoletti	CSPV	Safe Havens	Disagreed	Agreed	Agreed w/ Modifications	Resources Needed	Reference
concerns								
7. PROTECTION & SECURITY:								
All security staff trained in nonviolent de-escalation	X				X		X	7.a
Security staff trained in laws, policies and procedures about student searches			X		X		X	7.b
Consolidate school safety policies for ease of training and use			X		X		X	7.c
Security staff become active members of CASSLEO		X				X	X	7.d
All security staff trained in physical security			X		X		X	7.e
Trained security directors supervise security staff rather than educational administrators supervising			X			X	X	7.f
Security directors in charge of SROs			X	X				7.g
Student training on building security			X		X		X	7.h
Building assessments conducted by a qualified outside team every three to five years			X		X		X	7.i
Classroom doors that lock from the inside.			X		X		X	7.j
Security staff stagger schedules for increased protection			X		X			7.k
All staff trained in physical security especially secured doors			X		X		X	7.l
All exterior doors secured			X		X		X	7.m
When possible, updated camera equipment with consistent time stamping			X		X		X	7.n
8. Threat Assessment Guidelines:								
District policy for threat assessment to include: authority to conduct; capacity to conduct; integrated & interagency system and; awareness training for all	X		X		X		X	8.a
Staff assigned to threat assessment team(s)	X				X		X	8.a/b
Three person team trained and updated every 2 to 3 years	X		X		X		X	8.c
District level subject matter experts (SME) or review team identified for	X		X		X		X	8.d

Recommendations	Kanan/ Nicoletti	CSPV	Safe Havens	Disagreed	Agreed	Agreed w/ Modifications	Resources Needed	Reference
consultation, training and/or participation in assessment or planning as needed								
The district's process should specify how they will accomplish:								
Consistent process across district schools	X		X		X		X	8.e
Vortex of information established at each school	X	X				X	X	8.f
Threat assessment guidelines or manual district/school create a threat assessment manual		X			X		X	8.g
Districts/schools install a validated threat assessment process		X				X	X	8.h
Vortex coordinator at each school		X				X	X	8.i
Use Infinite Campus as data base for threat assessments & to record safety plan		X				X	X	8.l/m
Document matters of public safety		X				X	X	8.k/m
Make information available to professionals needing access		X				X	X	8.l/m
Active notification to all professionals involved with student of concern		X				X	X	8.m
Use a validated risk assessment to build the safety plan for at-risk students		X				X	X	8.n
9. Threat Assessment Process:								
Team is convened with safety as the priority	X				X		X	9.a
Variety of information sources utilized	X				X		X	9.b
Special education considerations and staff included when appropriate	X				X		X	9.c
Interview student of concern	X				X		X	9.d
Interview parents of student of concern	X		X		X		X	9.e
Interview witnesses	X				X		X	9.f
Collect all data in behavioral terms	X		X		X		X	9.g
Release of information from parents for mental health services, if appropriate			X		X		X	9.h
All data evaluated using the 11 questions of the US Secret Service	X	X	X		X		X	Page 4
Countermeasures created commensurate with levels of concern	X		X		X		X	9.j

Recommendations	Kanan/ Nicoletti	CSPV	Safe Havens	Disagreed	Agreed	Agreed w/ Modifications	Resources Needed	Reference
Safety plan created for at-risk student	X	X			X		X	9.k
Safety plan created by Interagency Social Support Team		X				X	X	9.l
Identify responsible school staff to implement safety planning steps	X				X		X	9.m
Identify safety planning steps for which the student will be responsible	X				X		X	9.n
Identify safety planning steps for which the parents of the student at-risk will be responsible	X				X		X	9.o
Information vortex coordinator assigned to every student of concern to continue to seek out and evaluate the student		X				X	X	9.p
Dates for safety plan review identified	X		X		X		X	9.q
District-level oversight of the process	X	X			X		X	9.r
Records maintained according to district policy	X				X		X	9.s
Reconvene the team when additional factors make that necessary					X		X	9.t
District office review by assigned individual or team	X		X		X		X	9.u
Records maintained at district level also	X				X		X	9.v
School/districts conduct an internal audit of their threat assessment process and report the findings to their school boards annually or biennially		X				X	X	9.w
Each at-risk student paired with an adult in authority to build a trusting and positive relationship		X		X			X	9.x
Formal debrief after every violent event		X			X			9.y
10. Threat Assessment Training								
All staff trained in awareness of violence and behavior s of concern	X				X		X	Section 3
Emphasis on timely reporting of students of concern	X				X		X	Section 3
Multiple avenues of reporting established for students, staff, parents and community	X				X		X	10.c
All TA members trained with periodic updates as specified in district policy	X				X		X	10.d

Recommendations	Kanan/ Nicoletti	CSPV	Safe Havens	Disagreed	Agreed	Agreed w/ Modifications	Resources Needed	Reference
Training attendance of ALL participants documented	X				X		X	10.e
Law enforcement officers utilized in school/district TA teams should be trained with the team	X					X	X	10.f
Teams should train or practice together	X					X	X	10.g
Case scenario practice is beneficial	X	X			X		X	10.h
Face-to-face training can be augmented with support documents but not replaced with them	X				X		X	10.i
Support documents should be available on district's website	X				X		X	10.j
Dedicated training time for threat assessment topics alone	X					X	X	10.k
Include the following in training:								
History of school violence and lessons learned	X				X		X	10.l
Clarity about WHEN to do a TA	X				X		X	10.m
Clarity about the team	X				X		X	10.n
Six principles of the US Secret Service	X	X			X		X	10.o
FERPA relevant exceptions	X				X		X	10.p
In district policy, manuals, codes of conduct & training the meaning of FERPA clearly communicated to staff, students and parents		X	staff			X	X	10.q
Training for awareness of appropriate use of warning signs	X				X		X	Section 3
Key findings of the US Secret Service	X				X		X	10.s
Awareness of avenger violence	X				X		X	10.t
How to evaluate written materials	X				X		X	10.u
Train on correctly coding threat i.e. direct, indirect and veiled, etc.	X					X	X	10.v
Weapons question asked of student and parents. "None known" if unable to reasonably ascertain the presence of weapons	X					X	X	10.w
Train for evaluation of information. If required to identify level of concern, examples and explanations should be provided	X				X		X	10.x
Train in a validated instrument using a one-on-one cognitive behavioral standard.		X				X	X	10.y

Recommendations	Kanan/ Nicoletti	CSPV	Safe Havens	Disagreed	Agreed	Agreed w/ Modifications	Resources Needed	Reference
Train all teachers and staff		X				X	X	10.z
Additionally, train principals, assistant principals, counselors and SROs in a minimum one-day hands-on scenario curriculum		X				X	X	10.aa
Teach the identification and coding of behaviors i.e. normal, boundary probing, attack related or attack	X					X	X	10.bb
Use of 11 Key Questions of the US Secret Service reviewed	X				X		X	10.cc
Teach creation of effective intervention plans commensurate with level of concern and suggestions for monitoring	X				X		X	10.dd
Train for each step of the district process in addition to reviewing the documentation form	X				X		X	10.ee
Use case studies for tabletop practice in training	X				X		X	10.ff
Participants should evaluate the training	X				X		X	10.gg
11. Threat Assessment Documentation								
Review all forms to be sure they guide less experienced school personnel thru the process	X				X		X	11.a
Single prompts on forms with sufficient space for clarification and/or evidence	X				X		X	11.b
Section listing all recommended data sources including social media in accordance with district's legal counsel	X				X		X	11.c
Documentation forms need to include a step to evaluate all data sources using the SS11 questions before any decision making or intervention planning	X				X		X	11.d
Intervention plan needs to be: detailed, persons responsible identified and dates of reviews included	X				X		X	11.e
All action plans should include monitoring of the student	X				X		X	11.f
Point of contact identified preferably a mental health professional	X				X		X	11.g
Daily or weekly check-ins required with examples provided	X					X	X	11.h

Recommendations	Kanan/ Nicoletti	CSPV	Safe Havens	Disagreed	Agreed	Agreed w/ Modifications	Resources Needed	Reference
Document check-in	X				X		X	11.i
Supply consequences and adhere to them if check-ins are not completed	X				X		X	11.j
Cases classified as: currently active & under review; active with proactive monitoring of behavior and countermeasures; inactive with reactive monitoring as needed	X					X	X	11.k
Cases noted in the electronic record keeping for individual students	X				X		X	11.l
12. Recovery								
Mental health recovery plan for long-term support and follow-up for students, faculty and staff			X		X		X	12.a
Training of staff to handle the recovery phase			X		X		X	12.b
Staff trained in suicide assessments			X		X		X	12.c
Debriefing of staff, students and first responders after events			X		X		X	12.d
13. Colorado School Safety Resource Center								
Convene a work group to examine threat assessment and provide guidance for training and documentation to schools	X				X		X	13.a
Extract the common variables in the threat assessments used successfully in Colorado schools	X				X			13.b
Define the similarities and differences in responsibilities of the Multi-jurisdictional Threat Assessment Team and the Interagency Social Support Team in the threat assessment and support process		X				X		13.c
Audit any school-district for proper use of their "validated" threat assessment process		X		X				13.d
Certify principals, assistant principals, counselors and SROs in threat assessment at least once every three years		X		X				13.e
Review all TA debrief reports and coordinate a working group to improve information sharing, threat assessment and systems thinking in		X				X		13.f

Recommendations	Kanan/ Nicoletti	CSPV	Safe Havens	Disagreed	Agreed	Agreed w/ Modifications	Resources Needed	Reference
school safety and violence prevention								
Help districts establish an accountability system for ensuring schools follow their guidelines of retraining and membership of threat assessment and ISST		X			X			13.g
14. Colorado Attorney General's Office & Safe2Tell								
Statewide promotion of Safe2Tell	X	X	X		X		Unknown	14.a
AG's office prepare an opinion on the application of FERPA to information sharing of schools with outside agencies		X			X		Unknown	14.b
Annually update the Colorado School Violence Prevention and School Discipline Manual		X			X		Unknown	14.c
Promote Safe2Tell in formal trainings: Skills practice; one-on-one feedback; and coaching		X			X		Unknown	14.d
Advertise & promote S2T all year including during school breaks			X		X		Unknown	14.e
15. Law Enforcement								
Officers acting as part of a school based threat assessment team should participate in the district training process or similar training	X				X		X	15.a
Interview of the student of concern by law enforcement officer			X			X	Unknown	15.b
Interview of parents of the student of concern			X			X	Unknown	15.c
Consultation with the office of the district attorney			X			X	Unknown	15.d
16. Other School Recommendations								
Schools create a continuous improvement model of error review committee		X		X			X	16.a
Training in higher education programs on school safety and emergency planning for all teachers, school mental health professionals and					X		Unknown	16.b

Recommendations	Kanan/ Nicoletti	CSPV	Safe Havens	Disagreed	Agreed	Agreed w/ Modifications	Resources Needed	Reference
administrators								
Training in classroom management in teacher education programs					X		Unknown	16.c

Appendix B: Members of the Review Working Group

Members of the Review Working Group

1. Travis Avery	Emergency Response Coordinator	Summit County Schools
2. Joanna Barker	School Psychologist	Denver Public Schools
3. Paula Buser	Director of Support Services	Canon City School
4. Stacy Davis	Director of Security & Emergency Management	St. Vrain Valley School District
5. Kathy Duncan	Prevention Specialist	Mapleton Public Schools
6. Jennifer Freedman	Principle	Private Contractor
7. Anna Gisetti	School Outreach Specialist	Colorado School Safety Resource Center, CDPS
8. Guy Grace	Director of Security & Emergency Preparedness	Littleton Public Schools
9. Wayne Granger	Executive Director	Flag Staff Academy
10. Christine Harms	Director	Colorado School Safety Resource Center, CDPS
11. James Hastings	Manager of Security Operations	Co. Sprgs. S.D. D-11
12. Guy Higgins	Principle	Private Contractor
13. Colette Hohnbaum	Coordinator of Intervention and Supports	Douglas County Schools
14. Sarah Hunter	School Social Worker	Adams 12
15. Kirsten Javernick	Director of Special Services	Canon City School
16. Ellen Kelty	Manager of Department of Social Work and Psychological Services	Denver Public Schools
17. Ron Lee	Director of Mental Health Services	Cherry Creek School District
18. Elizabeth Lindly	School Social Worker	Thompson School District
19. Greg McDonald	School Counselor	Boulder Valley School District & SB15-214 Committee
20. Toby Melster	Principal	Canon City School District
21. Jane Moon	School Psychologist	Pike Peak BOCES
22. John Nicoletti	Police Psychologist	Nicoletti & Flater
23. Kate O'Donnell	Social Worker & Counselor	Independent School & SB15-214 Committee
24. Susan Payne	Director	Safe2Tell, AG's Office
25. Sarah Rose	Program Assistant	Colorado School Safety Resource Center, CDPS
26. Patrick Schniederjan	School Psychologist	Mesa 51 School District
27. Jenny Shoen	Teacher	Littleton Public Schools
28. Carolena Steen	Assistant Superintendent	Cheyenne Mt. Schools

29. Brad Stiles	Emergency Response Outreach Coordinator	Colorado School Safety Resource Center, CDPS
30. Daniel Sneider	Education Supervisor and Transition Coordinator	Tennyson Center for Children
31. Kelli Thompson		Elbert Schools
32. Nate Thompson	Director of Social, Emotional & Behavior Services	Littleton Public Schools
33. Christopher Walner	Manager	Colorado Integrated Criminal Justice Information System, CDPS
34. Kevin West	Director of Intervention Services	School District 27j
35. Chris Wilderman	Director of Operations, Security & Environmental Services	Boulder Valley School District

Appendix C: NIMS School Response Framework

Requirement	Rationale	Recommended Components	Targeted Date of Completion	Date of Completion
1. Establish a date for compliance	On or before July 1, 2009 each district and the CSI was to establish a timeline as to when they will be in compliance with the requirements set forth in SB08-181/CRS 22-32-109.1 and begin working toward achieving the NIMS tenets, in coordination with community partners, develop a strategic plan for achieving compliance.	Send target compliance date to the Colorado Department of Education via the Accreditation Report.	**Compliance date established by July 1, 2009**	**Target Date of Completion:** _____ **Actual Date of Completion:** _____
2. Formally adopt the National Response Framework (NRF)	Each district and the CSI must adopt the National Response Framework and NIMS formally through orders or resolutions.	Present/pass a school board order or resolution.		
3. Institutionalize the Incident Command System (ICS)	In adopting the NRF and NIMS, each district and the CSI charter schools will institutionalize ICS. ICS is the coordinating link between multiple agencies and jurisdictions in an emergency response. Each district/charter school will adopt ICS as the management structure to be utilized in school and district emergency response plans.	Each district/charter school should review/revise emergency plans to incorporate NIMS and reflect NRF and review with community partners. Key district personnel complete recommended minimum NIMS trainings: Safety Team Members & Backups – ICS 100SCa District Crisis Plan Developers – ICS 100SCa and IS 362		
4. Develop an emergency response plan	Each district and charter schools must, on or before July 1, 2009, begin working with key community partners to develop an all-hazard, comprehensive emergency response plan and to the extent possible, an emergency communications plan that coordinates with local, county and state emergency plans. The plan, at a minimum, must identify for each school the following: • Safety Teams/backups • Key operational locations and facilities to be utilized by first responders	Finalize District Crisis Team members and individual School Crisis Team members. Each facility within the district collaborates with community partners, such as first responders and emergency response agencies to identify key operation locations, facilities, and communications to be utilized in emergency situations, both for the district and the community at large. Utilizing the "Four Phase Model" the district will create a comprehensive safe school plan that will address prevention/mitigation, preparedness, response/intervention, and recovery.		
5. Enter into memoranda of understanding (MOUs) with community partners	Each district and CSI charter school, to the extent possible, will enter into a memorandum of understanding with community partners that will define the expectations and responsibilities on the part of both the district/charter schools and first responders regarding a response to a school, coordinating services and minimizing potential conflicts.	Written district/charter school MOUs should be with first responding agencies, medical facilities, mental health agencies local emergency management personnel and local or regional homeland security personnel and emergency response agencies.		

Requirement	Rationale	Recommended Action Components	Targeted Date of Completion	Date of Completion
6. Create an all-hazard exercise program based on NIMS, hold coordinated exercises and conduct written evaluation following the exercises.	School districts and the CSI, to the extent possible, must create an "all-hazard exercise program." It is recommended that districts and the CSI develop a comprehensive, scenario-based exercise program that allows schools to work closely with local emergency responders in testing district plans, interagency communication plans and systems and facilitating cooperative efforts in coordinating response plans. CRS 22-32-109.1 requires, to the extent possible, specific exercises be held involving community partners to include orientation meetings, all-hazard drills (above & beyond fire drills) and tabletop exercises. It is recommended that districts develop an exercise schedule, based on community needs and hazards.	Each district/charter school will develop a comprehensive, scenario-based all-hazards exercise program based on NIMS, to include, but not limited to: drills, testing of communication systems, table top exercises, full-scale exercises that include first responding and emergency response agencies, when possible. CRS 22-32-109.1 requires written evaluations after exercises and real world incidents. Each exercise, regardless of the type, should result in an After Action Report describing lessons learned and the corrective actions that will occur, if necessary. A comprehensive, all-hazard exercise program includes various types of exercises; including full-scale exercises, that build in sophistication and complexity balanced by community needs and hazards.		
7. Inventory Emergency Equipment	Each district and CSI school needs to adequately equip its facilities to respond to emergency situations and should work towards developing interoperable communication systems with responding agencies and the community.	Each district and CSI school will complete an annual inventory of emergency equipment, including radios or other communications systems. Districts and CSI schools should develop written procedures for communication with first responders, parents and media. It is recommended that the School Safety, Readiness and Incident Management Plan outline exactly how these communication requirements will be met.		
8. Training Recommendations	NIMS compliance varies for schools, various levels of government and professional response organizations. CRS 22-32-109.1 states "school personnel must be required to be trained in the incident command system according to guidelines established by the federal emergency management agency." The position statement recommends these courses as the minimum for school personnel: ICS 100SCa, An Introduction to ICS for Schools and IS 362 Multi-Hazard Emergency Planning for Schools	**ICS 100SCa, An Introduction to ICS for Schools** is recommended for all persons with a responsibility in a Safe School, Readiness and Incident Management Plan or designated in a school incident command structure. **IS 362 Multi-Hazard Emergency Planning for Schools** should be taken by those school personnel responsible for developing a Safe School, Readiness and Incident Management Plan. **Colorado Interoperable Communications Training Program*** - web-based training is available for school personnel designated in a school incident command structure. Additional training resources (classroom and agency specific) to support this curriculum are available via community partners.		
Additional Requirements of SB-181	Districts and CSI charter schools must work closely with community partners in updating and revising all standard operating procedures and ensuring all aspects of NIMS, as applicable, are incorporated.	Periodic meetings with community partners should be held to coordinate with districts and CSI's charter schools to assess overall compliance with NIMS, as put forth in SB-181, and develop a timeline and strategic plan for compliance.		

References: CRS 22-32-109.1/SB08-181/SB11-173 - Colorado School District Self Insurance Pool, CASB, CDPS, CDE and Division of Emergency Management, "Position Statement on SB08-181," Adapted with permission from: Morgan County School District RE-3. Revised July 2011 by Governor's Office of Information Technology; CO Division of Fire Safety & CSSRC

*Interoperability – The ability of emergency responders to communicate among jurisdictions, disciplines, and levels of government, using a variety of frequency bands, as needed and as authorized. System operability is required for system interoperability. – National Emergency Communications Plan