

January 27, 2016

To the Members of the School Safety and Youth in Crisis Committee of the Colorado Legislature:

We are writing you in order to provide the committee with some additional information that might be beneficial as you go forward in your work. Given the late hour in the day when our report was heard last Friday, and the fatigue of everyone involved, it seemed that the very short questioning of our group might not have provided the clarification opportunity that was given to the other groups. While we see agreement in some of the findings of the reports, we believe careful reading also shows some variation in findings that are significant, and propose very different solutions. We urge the committee to consider not only the similarities in the reports, but also those important differences. We hope you will consider this our response to the question that was posed to Mr. Woodward after his report was presented, but was not posed to us, that is, our statement of comparison of information in the other reports.

WOODWARD-GOODRUM FINDING: Failure in Information Sharing, Summarized as a Failure to Have an Information Sharing Agreement.

THE KANAN ET AL. REPORT FINDING: Communication and Reporting Gaps

We found that significant amount of the available data regarding behaviors of KP was not made available to the school threat assessment team, recognized by detectors as representing a behavioral concern, nor utilized appropriately during the decision making process at the school on September 9, 2013. Clearly, additional behaviors of concern occurred and were reported to some others *after* the threat assessment on September 9, 2013 but were also *not reported in any way* to law enforcement, Safe2Tell, or the school administration, or the threat assessment team. While gaps in communication, awareness, and reporting occurred at AHS, those gaps were also shared by others outside the school as shown in our report, beginning on page 107: the parents of KP not reporting weapons training, community therapists who could not be contacted due to the failure of the parents to sign a release of information, a community member at the library who saw pictures of a shotgun, students who knew about or were shown weapons and did not report those concerns to school administration or other reporting method (such as Safe2Tell), and even another law enforcement agency who had information about a previous threat to a girl in another community that was never reported to the AHS SRO or AHS administration.

Other information known, but not recognized as significant, was not taken on to the threat assessment team for additional review. We believe the Safe Havens report also echoes those findings, though stated differently. Therefore, our recommendations centered around awareness training for *all* members of the school and community and threat assessment training for all members of a threat assessment team. We believe good training of people is part of the solution.

The lack of a formal information sharing agreement, as prepared by the Attorney General's Office did not seem to be an issue in this case. Significant work had been done by the CSSRC and many state agencies to improve information sharing during Dr. Kanan's time in

the Department of Public Safety. There is agreement that not many of these agreements have been formally signed across our state. We do know, however, that information sharing does not seem to be the same barrier it was during the days of Columbine, as law enforcement agencies share information regularly with schools, and schools have multiple ways in which to involve law enforcement now, especially with increases in SROs. The SRO in this case was notified of the AHS threat. Any effort to gain more information sharing agreements around the state might best begin by examining the barriers that have existed to completion of these since 2000. The information sharing agreement on the Attorney General's site proposes multiple agencies involved in this process. Each of those agencies and groups should be contacted for input and jointly responsible.

WOODWARD-GOODRUM FINDING: Threat Assessment Needs to be Validated and Other Assessment Tools Used

KANAN ET AL. REPORT FINDINGS: Threat Assessment processes should be reviewed against the best practices provided by the authors of the report, based on the findings in this case and as outlined by the experts in federal agencies and the CSSRC. Threat assessment training needs to be reviewed for *key* content areas. The authors provided their key content areas, but recommend that a *work group* be re-convened by the CSSRC to examine and provide guidance to schools in this area. Training should occur for *all* members of a threat assessment team, and the documentation forms should be reviewed for key content on the form to provide a record of the behavioral data used during review and for a structured management plan.

The Woodward-Goodrum report and the other 2 reports *all* found significant gaps in the threat assessment process *as implemented* in the AHS case. The foundation of the threat assessment process as outlined in the CSSRC *Essentials of School Threat Assessment* that is used by many schools across our state is the FBI, the U.S. Secret Service, and the U.S. Department of Education, and other federal agencies. That information serves to provide efficacy of such a process and can be found on pages 36-40 of our report. We do not see the documentation forms used by the schools as an assessment tool that needs validation, as they are not scored in any way, and the items on those forms are not all equal in weight. They serve as documentation of a *process*. If the process is implemented with fidelity to the recommendations from the guidance, we believe they have a foundation for best practice. In addition, one of the assessment tools recommended in the Woodward-Goodrum report was not designed, nor has never been standardized, for use in schools. These are very important issues related to any recommendation for use of any specific evaluation tools used in a school setting and another reason for caution and further study.

Threat assessment recommendation differences made in the reports is an important professional debate that needs more study and conversation, not a mandate or audit for schools. Threat assessment in schools is a field without much research or review in professional literature. Dr. Cornell's model from Virginia is the only one that has been studied and reported, but many schools around the country have valid forms and processes much like the one being used in LPS and in other Colorado schools. Our recommendation is for the CSSRC to reconvene a work group to *further study this important issue over time* and with input from federal agencies, professional organizations, Colorado schools, and other

experts in the field of threat assessment. The larger school districts have well-developed protocols and training and extensive data that goes back to 2003. Their data would include *thousands of cases* of successful implementation of such a process over time. Those districts should be encouraged to provide their data for a closer look at the practices in Colorado. We encourage caution in using one case in one district to determine a future for *all* Colorado schools and kids.

Finally, the call for audit or validation of processes also has the potential for negative effects on several levels. One concern may be that threat assessment teams and school districts could become be caught up in attention to forms and paperwork and further audits would direct resources and energy away from the services for children. We are also unclear how the majority of smaller districts would have resources to accomplish that. In addition, with the Claire Davis Act, school liability is involved, and anything mandated needs very careful consideration. In addition, we believe that a unilateral requirement for implementation of the V-STAG model is not necessary or prudent at this time. One reason for that statement is that many Colorado school districts already have very effective threat assessment procedures with evidence-based outcomes. Specifically, their threat assessment processes have mitigated and disrupted many potentially violent situations. Also, the knowledge about school violence and threat assessment are evolving fields and legislating any one model would be short sighted. The experts in the field, both nationally and within our state, need the flexibility to change with the learning and keep updated on school violence and threats. We recommend that the committee consider the *numerous success cases* in Colorado and that the CSSRC extract the common variables from those districts.

We agree that each school should have a threat assessment team and that the process of threat assessment needs good training. That would be a good first step, as we should work to ensure that threat assessment teams have been established and training has occurred in *all* school districts. The Colorado School Safety Resource Center has the ability to hear directly from Colorado schools that are successfully implementing the process and call additional experts to help review the Colorado model, and to provide guidance for training and documentation. They also have the ability to make best practice recommendations for Colorado schools.

We encourage the committee to not only look at the similarities in the report findings, but to also examine the differences in recommendations that could be made to improve safety in all Colorado schools and have the best opportunity for implementation in all communities. If we can be of any further service or provide more information for any of you, please let us know. Our contact information is below.

Thank you,



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