



TYPE:

POLICY

SECTION:

OPERATIONS

TITLE:

THREAT ASSESSMENT POLICY

BOT ADOPTED:

MAY 11, 2021

BOT AMENDMENTS:

MARCH 19, 2024

BOT AMENDMENTS:

NOV 19, 2024

THREAT ASSESSMENT POLICY

Purpose

The Board is committed to protecting the health, safety and welfare of its students and the school community and providing the resources and support to address identified student needs. The Board adopts this policy to address student behavior that may indicate a threat to the safety of the student, other students, school employees, school facilities, the community and others.

Authority

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The Board directs the Executive Director or designee, in consultation with the School Safety and Security Coordinator, to establish a threat assessment team and develop procedures for assessing and intervening with students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community and others.

Definitions

Behavioral service providers - includes, but is not limited to, a state, county or local behavioral health service provider, crisis intervention center or psychiatric hospital. The term includes a private service provider which contracts with a state, county or local government to act as a behavioral health agency.

Bias - the attitudes or beliefs we have about a person or group that affects our understanding, actions and decisions in a conscious or subconscious manner.

Individualized Management Plan - a plan developed for a student who is referred to the threat assessment team that documents the concerns that brought a student to the team's attention, as well as the resources and supports a student might need based on the information gathered during the assessment.

Threat assessment - a fact-based process for the assessment of and intervention with students whose behaviors may indicate a threat to the safety of the student other students, school employees, school facilities, the community or others.

Delegation of Responsibility

The Executive Director or designee, in consultation with the School Safety and Security Coordinator, shall appoint individuals to the school's threat assessment team.

The threat assessment team shall include the School Safety and Security Coordinator and individuals with expertise in school health; counseling, school psychology or social work; special education and school administration.

The Executive Director or designee may assign additional staff members or designate community resources to the threat assessment team for assessment and response support.

Guidelines

Training

The Executive Director or designee shall ensure that threat assessment team members are provided individual and/or group training by the last week of August before the school year begins and when new members join. The Board's strategic calendar will require an annual audit by the September board meeting to confirm that all TAT members have received training in case any members leave and need to be replaced.

The trainings will focus on:

- Responsibilities of threat assessment team members;
- Process of identifying, reporting, assessing, responding to and intervening with threats;
- Identifying and avoiding racial, cultural or disability bias; and
- Confidentiality requirements under state and federal laws and regulations, and Board policies.

Threat assessment team training shall be credited toward professional education requirements and school safety and security training requirements for staff, in accordance with applicable law and Board policy.

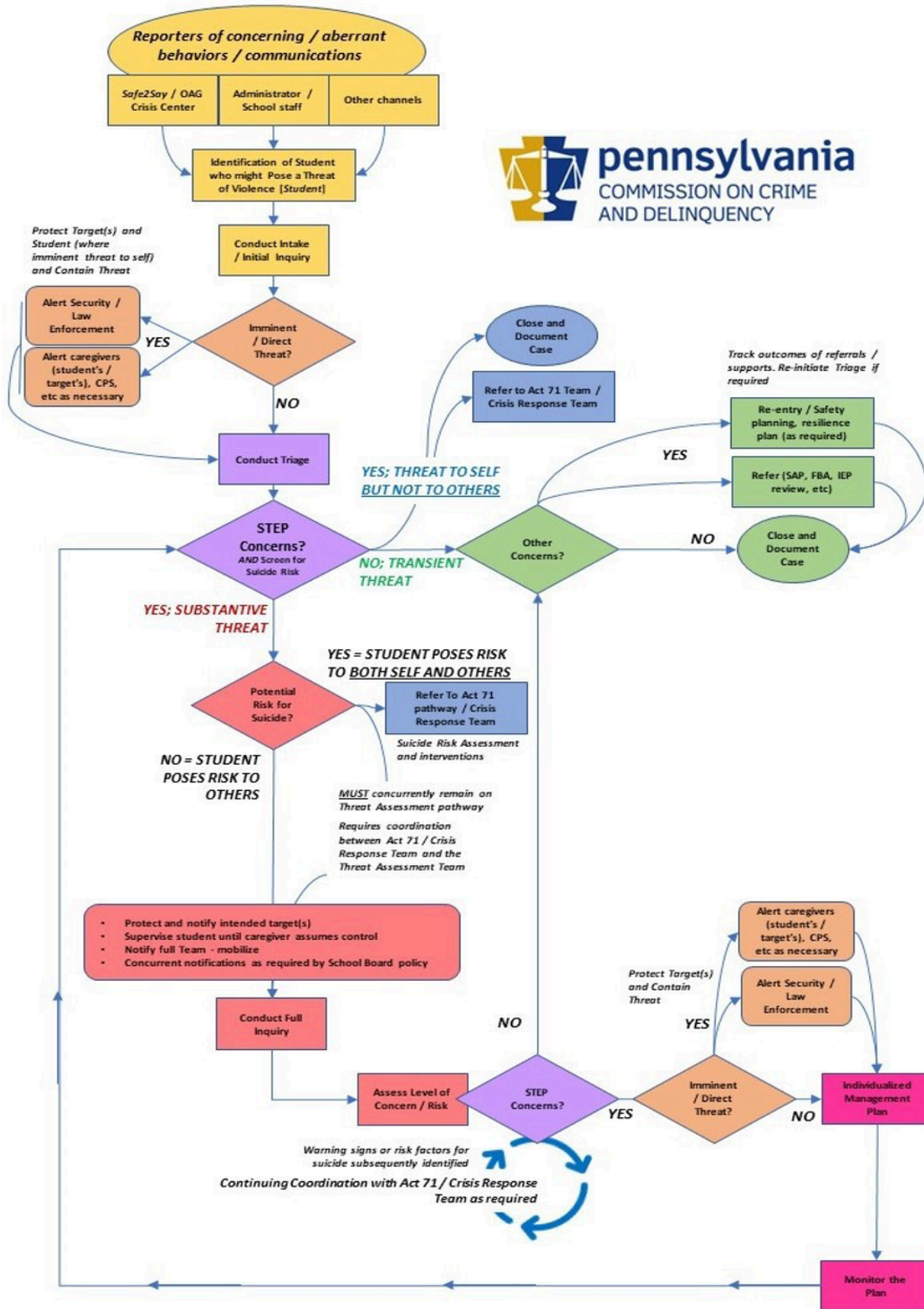
Information for Students, Parents/Guardians and Staff

The school shall notify students, staff and parents/guardians about the existence and purpose of the threat assessment team through posting information on the school website, or other appropriate methods.

The threat assessment team shall inform students how to recognize threatening or at-risk behavior that may present a threat to the student, other students, school employees, school facilities and community members and how to report concerns, including using the Safe2Say Something program and other school reporting methods.

The threat assessment team shall make available informational materials for school employees regarding recognition of threatening or at-risk behavior that may present a threat to the student, other students, school employees, school facilities, the community or others and how to report concerns, including through the Safe2Say Something program and other school reporting methods. Information for school employees shall include a list of the staff members who have been appointed to the threat assessment team.

STEPS FOR REPORTING THREATS



EXPLANATION OF THE STEPS

Reporting and Identification

Any suspected threat reported to or witnessed by an employee shall be documented through the Threat Assessment Form and promptly provided to a member of the TAT. The threat assessment team shall document, assess and respond to reports received regarding students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others. The threat assessment team shall assist in assessing and responding to reports that are received through the Safe2Say Something Program identifying students who may be a threat to themselves or others. The threat assessment team shall assist in assessing and responding to reports of students exhibiting self-harm or suicide risk factors or warning signs, as identified in accordance with applicable law and Board policy.

Imminent Threat of Safety

When the threat assessment team has made a preliminary determination that a student's reported behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others, the team shall immediately take the following steps.

1. Notify the Executive Director or designee and School Safety and Security Coordinator of the reported threat.
2. A member of the Threat Assessment Team shall notify the student's parent/guardian of the reported threat.

When a reported student's threat or behavior indicates that there may be an imminent threat to the safety of the student or others, an emergency, allegation or incident involving a gun or weapon,

1. the team member shall take immediate action
2. including promptly notifying the local law enforcement agency, school administration, and any parents of involved students.
3. Where it has been determined a threat could impact other school districts, all school districts who may be impacted shall be notified immediately.
4. Where a threat assessment team member has reasonable cause to suspect that a reported situation indicates that a student may be a victim of child abuse, the member shall make a report of suspected child abuse in accordance with law and Board policy.

Inquiry and Assessment

In investigating, assessing and responding to threat reports, the threat assessment team shall decide if the report should be addressed under one or more specific Board policies or administrative regulations, based on the subject matter of the report and the requirements of law, regulations and Board policy, including, but not limited to, reports involving:

1. Discrimination/Title IX Sexual Harassment.
2. Bullying/Cyberbullying.
3. Suicide Awareness, Prevention and Response.
4. Hazing.
5. Dating Violence

Assessment

Members of the threat assessment team shall engage in an assessment of the reported student behavior that may indicate a threat, in accordance with training and established procedures. This process may include, but is not limited to:

1. Interviewing the student, other students, staff, parents/guardians or others regarding the subject(s) of the reported threat.
2. Reviewing existing academic, health and disciplinary records and assignments, as appropriate regarding the subject(s) of the report.
3. Conducting searches of storage spaces, and other possessions on school property as applicable, in accordance with applicable law, regulations and Board policy.
4. Examining outside resources such as social media sites, in coordination with law enforcement, or contacting law enforcement, juvenile probation, or community agencies to request additional information about the subject(s) of the report, in accordance with law, regulations and Board policies.
5. Where appropriate, convening the appropriate team to assess and/or address the situation that is the subject of the report, such as the Individualized Education Program (IEP) team, Section 504 Team, Behavior Support team, Student Assistance Program team, or others.
6. The threat assessment team shall establish and implement procedures, in accordance with the school's Memorandum of Understanding, to address situations where the investigation of a reported threat shall be transferred to the appropriate law enforcement agency.

The threat assessment team may request that the county agency or juvenile probation department consult and cooperate with the team in assessing the student who is the subject of a preliminary determination regarding a threat.

When assessment of a student's behavior determines that it is not a threat to the student, other students, school employees, school facilities, the community or others, the threat assessment team shall document the assessment and may refer the student to other appropriate resources such as a child study team, the Student Assistance Program team, an IEP or Section 504 Team or other school supports and services.

Response and Intervention

The threat assessment team shall develop an Individualized Management Plan for each student identified and assessed as posing a threat to the student, other students, school employees, school facilities, the community or others. The plan should document the team's evaluation of the threat and recommendations for disposition of the threat, including the information gathered during the assessment and recommendations for response and intervention.

Following notification to the student's parent/guardian, the threat assessment team may refer the student to an appropriate program or take action to address the reported situation in accordance with applicable Board policy, which may include, but is not limited to:

1. A referral to the Student Assistance Program.
2. A referral to the appropriate law enforcement agency.
3. An appropriate evaluation to determine whether the student is a qualified student with a disability in need of a Section 504 Service Agreement or in need of special education services through an Individualized Education Program (IEP), in accordance with applicable law and Board policy.
4. A referral to the student's IEP Team to review and address the student's IEP and/or Positive Behavior Support Plan. This could include, but is not limited to, a manifestation determination or functional behavioral assessment in accordance with applicable law, regulations and Board policy.
5. A referral to the student's Section 504 Team to review and address the student's Section 504 Service Agreement and/or Positive Behavior Support Plan.
6. With prior parental consent, a referral to a behavioral service provider, health care provider or county agency.
7. Addressing behavior in accordance with applicable discipline policies and the Code of Student Conduct.
8. Ongoing monitoring of the student by the threat assessment team, a child study team, Student Assistance Program team or other appropriate school personnel.
9. Taking steps to address the safety of any potential targets identified by the reported threat.

- *Safe Schools Incident Reporting*

For Safe Schools reporting purposes, the term **incident** means an instance involving an act of violence; the possession of a weapon; the possession, use, or sale of a controlled substance or drug paraphernalia as defined in the Pennsylvania Controlled Substance, Drug, Device and Cosmetic Act; the possession, use, or sale of alcohol or tobacco; or conduct that constitutes an offense listed under the Safe Schools Act.

When a reported threat also meets the definition under the Safe Schools Act, in accordance with reporting requirements, the Executive Director or designee shall immediately report required incidents, if not previously reported by school staff, and may report discretionary incidents committed by students on school property, at any school-sponsored activity or on a conveyance providing transportation to or from a school or school-sponsored activity to the local police department that has jurisdiction over the school's property, in accordance with state law and regulations, the procedures set forth in the Memorandum of Understanding with local law enforcement and Board policies.

The Executive Director or designee shall notify the parent/guardian, if not previously notified by school staff, of any student directly involved in an incident on school property, at any school sponsored activity or on a conveyance providing transportation to or from a school or school sponsored activity who is a victim or suspect, immediately, as soon as practicable. The

Executive Director or designee will inform the parent/guardian whether the local police Department that has jurisdiction over the school property has been or may be notified of the incident. The Executive Director or designee will document attempts made to reach the parent/guardian.

- *Students With Disabilities* -

When reporting an incident committed by a student with a disability or referring a student with a disability to a law enforcement agency, the school shall provide the information required by state and federal laws and regulations and shall ensure that copies of the special education and disciplinary records of the student are transmitted for consideration by these authorities. The school shall ensure compliance with the Family Educational Rights and Privacy Act when transmitting copies of the student's special education and disciplinary records.

Monitoring and Management

If a student has an Individualized Management Plan, the threat assessment team shall monitor the Individualized Management Plan and coordinate with the designated team or resource to provide support and follow-up assessment as necessary. Follow-up assessments, referrals, re entry plans and other supports shall be documented as part of the student's Individualized Management Plan.

The threat assessment team, in coordination with other appropriate teams and supports, shall determine when the student's Individualized Management Plan is no longer needed for disposition of the threat(s), and may transfer appropriate information in accordance with applicable law, regulations and Board policy.

Records Access and Confidentiality

To carry out their duties and facilitate the timely assessment of and intervention with students whose behavior may indicate a threat, the threat assessment team shall have access to the following student information to the extent permitted under applicable law and regulations:

1. Student health records.
2. Prior school disciplinary records.
3. Records related to adjudication under applicable law and regulations.
4. Records of prior behavioral or mental health or psychological evaluations or screenings maintained by the school.
5. Other records or information that may be relevant to evaluating a threat or determining treatment or referral options for a student that are maintained by the school.

The threat assessment team shall use all information or records obtained in fulfilling the team's duty in accordance with law to evaluate a threat or to recommend disposition of a threat. Team members shall not redisclose any record or information obtained or otherwise use any record of a student beyond the purpose for which the disclosure was made to the team, in accordance with law.

The threat assessment team shall maintain confidentiality and handle all student records in accordance with applicable law, regulations, Board policy, the Student Records Plan and the school's legal and investigative obligations.

Threat assessment members whose other assignments and roles require confidentiality of specific student communications, in accordance with law, shall ensure that all confidential communications and information are addressed in accordance with applicable law, regulations, Board policy and administrative regulations.

Annual Board Report

The threat assessment team shall provide the required information to the Executive Director, in consultation with the School Safety and Security Coordinator, to annually develop and present to the Board, at an executive session, a report outlining the school's approach to threat assessment, which shall include:

1. The number of threat assessment team members assigned in the school, and their composition.
2. The total number of threats assessed that year.
3. A summary of interactions with outside law enforcement agencies, juvenile probation and behavioral service providers.
4. Recommendations for improvement of the school's threat assessment processes.
5. Any additional information required by the Executive Director or designee.

The annual threat assessment report shall be presented as part of the annual report to the Board by the School Safety and Security Coordinator on school safety and security practices.

The threat assessment team's information addressing verification of the number of threat assessment team members and their composition, the total number of threats assessed that year, and any additional information required by the Executive Director or designee shall be included in the School Safety and Security Coordinator's annual report on school safety and security practices that is submitted to the state's School Safety and Security Committee.

Legal

1. 24 P.S. 1302-E
2. 24 P.S. 1301-E
3. 24 P.S. 1205.2
4. 24 P.S. 1205.5
5. 24 P.S. 1310-B
6. 23 Pa. C.S.A. 6311
7. 24 P.S. 1303-A
8. 22 PA Code 10.2
9. 35 P.S. 780-102
10. 24 P.S. 1302.1-A
11. 22 PA Code 10.21
12. 22 PA Code 10.22
13. 22 PA Code 10.25
14. 20 u.s.c. 12329,

Use of information or records: The team shall use the information or records obtained under subsection (d) or (e) in fulfilling the team's duty to evaluate a threat or the recommended disposition of a threat. No member of a team may redisclose any record or information obtained under this section or otherwise use any record of a student beyond the purpose for which the disclosure was made to the team.

Disclosure: The following shall apply:


BOT adopted May 11, 2021; Revised November 19, 2024

- a. Records or documentation developed or maintained by a team shall not be subject to the act of February 14, 2008 (P.L.6, No.3), known as the Right-to-Know Law.
- b. The report and information presented to the school entity's board of directors and submitted to the committee under subsection (a)(2)(v) shall not be subject to the Right-to-Know Law.
- c. School entities shall not be required to report any data on the functioning of the team other than specifically required under this article.

Gillingham Charter School's written policy on Threat Assessment is public record.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

Adopted this 19th day of November, 2024


Scott Herbert (Dec 20, 2024 12:05 EST)

Board President


Dan Kutz (Dec 20, 2024 13:29 EST)

Board Secretary