Best Practices in Threat Assessment I: What You Need to Know

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Workshop Objectives

This workshop is designed to help participants:

- 1. understand and Implement the essential elements of a threat assessment process in schools;
- 2. conduct the steps of a fair and sound threat assessment inquiry in schools; and
- 3. design appropriate, effective, and safe action and support plans to meet the needs of all students following a threat assessment.

Helpful Websites

Colorado School Safety Resource Center https://www.colorado.gov/cssrc

US Department of Education, Readiness & Emergency Management for Schools http://rems.ed.gov/default.aspx

Sandy Hook Promise http://www.sandyhookpromise.org

The Ten Key Findings of The Safe School Initiative (2002) and Implications For Threat Assessment Procedures

1.	Incidents of violence at school are rarely impulsive acts.	Thought processes and behavior may be discernable from observation and communication. The time frame may be short, so quick inquiry and intervention is needed.
2.	Prior to most incidents, other people knew about the attackers ideas and/or plan to attack.	Students are an important part of prevention efforts. Schools need to encourage reporting of potentially dangerous threats or behavior. Schools need to ensure they have a fair, thoughtful and effective system to respond to information when it is brought forward.
3.	Most attackers did not threaten their targets directly prior to advancing the attack.	Schools should not wait for a direct threat to begin an inquiry. Schools should also inquire about behaviors and communications of concern.
4.	There is no accurate or useful "profile" of students who engage in targeted school violence.	Schools should not focus on profiles of students, but rather on behavior and communication. Ask, "does behavior or communication indicate the student may be on a path towards violent action?"
5.	Most attackers engaged in some behavior, prior to the incident, that caused concern or indicated a need for help.	When behavior of concern is noticed, additional probing by caring adults may find cause for warning or referral to law enforcement or for mental health services. Careful inquiry may determine a more comprehensive picture of a student's past and current behavior and any indications that the student is planning an act of violence.
6.	Most attackers were known to have difficulty coping with significant losses or personal failures. Many had attempted or considered suicide.	Inquiry should include questions about recent losses or perceived failures and about feelings of hopelessness and desperation. Aspects of a student's life that may either increase or decrease the potential for violence must be considered. Screening for suicide risk is also recommended as part of inquiry.
7.	Many attackers felt bullied, persecuted, or injured by others prior to the attack.	Schools should support ongoing efforts to reduce bullying and harassment. Assessing a student's history of bullying and harassment should be part of the inquiry. Have they developed a grudge for some reason?
8.	Most attackers had access to and had used weapons prior to the attack.	Schools should inquire about any efforts to acquire, prepare or use firearms, other weapons, or ammunition, including bomb making materials. Pay attention to access to and communications about firearms and other weapons.
9.	In many cases, other students were involved in some capacity.	Inquiry should include attention to the role that a student's friends or peers may be playing in the student's thinking and preparation for an act of violence. Are others involved? The climate of a school can help students see that adults can be called upon in times of need and that violence doesn't solve problems.
10.	Despite prompt law enforcement responses, most shooting incidents were stopped by means other than law enforcement interventions.	Preventative measures and good emergency planning are both needed. School must have protocols and procedures for responding to and managing threats and other behaviors of concern.

Information Sharing: Family Educational Rights and Privacy Act (FERPA)

Excerpt From: http://rems.ed.gov/K12FERPA.aspx, then see the "Information Sharing - FERPA" tab on the left. See full resource for more explanation.

FERPA is a federal law that protects the privacy of student *education records*. The law applies to all educational agencies and institutions that receive funds under any U.S. Department of Education program. FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. The Family Policy Compliance Office at the U.S. Department of Education administers FERPA. FERPA protects the rights of parents or eligible students to:

- Inspect and review education records;
- Seek to amend education records; and
- Consent to the disclosure of personally identifiable information (PII) from education records, except as specified by law.

What Are "Education Records?"

Different types of records and information may be protected by *FERPA* if determined to be "education records." Education records are protected by *FERPA* and are broadly defined as **records** that are directly related to a student and maintained by an educational agency or institution, or by a party acting for the agency or institution. This non-exhaustive chart shows several examples of what types of records generally **are** and **are not** considered to be education records.

Education Records	Not Education Records
Transcripts	Records that are kept in the sole possession of the maker and used only as personal memory aids
Disciplinary records	Law enforcement unit records
Standardized test results	Grades on peer-graded papers before they are collected and recorded by a teacher
Health (including mental health) and family history records	Records created or received by a school after an individual is no longer in attendance and that are not directly related to the individual's attendance at the school
Records on services provided to students under the <i>Individuals with Disabilities Education Act</i> (IDEA)	Employee records that relate exclusively to an individual in that individual's capacity as an employee
Records on services and accommodations provided to students under Section 504 of the Rehabilitation Act of 1973 and Title II of the ADA ⁵	

Who May Access FERPA-Protected Education Records?

"School officials with a legitimate educational interest" may access *FERPA*-protected education records. Schools determine the criteria for who is considered a school official with a legitimate educational interest under *FERPA* regulations, and it generally includes teachers, counselors, school administrators, and other school staff.

Balancing Safety and Privacy

School officials must balance safety interests and student privacy interests. *FERPA* contains exceptions to the general consent requirement, including the "health or safety emergency exception," and exceptions to the definition of education records, including "law enforcement unit records," which provide school officials with tools to support this goal.

The Health or Safety Emergency Exception to the Consent Requirement

FERPA generally requires written consent before disclosing PII from a student's education records to individuals other than his or her parents. However, the FERPA regulations permit school officials to disclose PII from education records without consent to appropriate parties only when there is an actual, impending, or imminent emergency, such as an articulable and significant threat. Information may be disclosed only to protect the health or safety of students or other individuals. In applying the health and safety exception, note that:

- Schools have discretion to determine what constitutes a health or safety emergency.
- "Appropriate parties" typically include law enforcement officials, first responders, public health
 officials, trained medical personnel, and parents. This FERPA exception is temporally limited to the
 period of the emergency and does not allow for a blanket release of PII. It does not allow
 disclosures to address emergencies that might occur, such as would be the case in emergency
 preparedness activities.
- The information that may be disclosed is limited to only PII from an education record that is needed based on the type of emergency.
- Disclosures based on this exception must be documented in the student's education records to memorialize the
 - Emergency that formed the basis for the disclosure; and
 - Parties with whom the school shared the PII.

The U.S. Department of Education would not find a school in violation of *FERPA* for disclosing *FERPA*-protected information under the health or safety exception as long as the school had a rational basis, based on the information available at the time, for making its determination that there was an articulable and significant threat to the health or safety of the student or other individuals.

For more information on the health or safety exception, see "Addressing Emergencies on Campus," June 2011, available at http://www2.ed.gov/policy/emergency-guidance.pdf and 34 CFR §§ 99.31(a)(10) and 99.36.

Common FERPA Misunderstandings

School administrators and their partner organizations must understand *FERPA* and its implications, because misinterpretations of the law and subsequent delays in information-sharing can hinder first responders' efforts to provide necessary assistance in a health or safety emergency.

Sharing Personal Observation or Knowledge

Misinterpreting FERPA can lead school administrators to miss opportunities to share crucial information that could prevent an emergency situation. For instance, some schools incorrectly believe that information obtained from a school official's personal observations or knowledge is protected by FERPA. In fact, personal observation or knowledge is generally not considered to be part of the student's education records (see "What Are 'Education Records'") and therefore may be disclosed. For example, if a teacher overhears a student making threatening remarks to other students, the teacher is not prohibited from sharing that information with appropriate authorities, including the parents of the students who were threatened.

However, if a school official learns of information about a student through his or her official role in creating or maintaining an education record, then that information would be covered by *FERPA*. For instance, if a principal suspends a student, the principal would not be permitted to non-consensually disclose that information (unless the disclosure met one of the exceptions in *FERPA* to consent) because he or she gained personal knowledge of that information in making that disciplinary

Additional Situations with FERPA Considerations

FERPA has implications in a variety of different situations, and new questions arise as schools become more creative and innovative in developing their campus safety plans. In many cases, however, it is helpful to review the FERPA basics to help you clearly think through each scenario. The following are some scenarios that may arise.

Threat Assessment Teams

Some educational agencies and institutions may need assistance in determining whether a health or safety emergency exists for purposes of complying with *FERPA*. Federal agencies encourage schools to implement a threat assessment program, including the establishment of a multidisciplinary threat assessment team that utilizes the expertise of representatives from mental health service providers, persons familiar with emergency procedures, and law enforcement agencies in the community.

The threat assessment team must comply with applicable civil rights and other federal and state laws. Under a properly implemented threat assessment program, schools can respond to student behavior that raises safety concerns that are not based on assumptions, stereotypes, or myths about people with disabilities (including mental health-related disabilities) or people of a particular race, color, ethnicity, national origin, religion, or sex.

If a threat assessment team member meets the definition of a school official (as a party to whom the school has outsourced administrative functions or services) with a legitimate educational interest under *FERPA*, (see "Who May Access *FERPA*-Protected Education Records"), then he or she would be able to access students' education records in which he or she has legitimate educational interests. A threat assessment team member who is appropriately designated as a school official, however, may not disclose PII from education records to anyone without consent or unless one of the exceptions to consent under *FERPA*, such as the health or safety emergency exception, applies.

Frequently Asked Questions Pertaining to FERPA

FERPA applies to educational agencies and institutions that receive funds under any program administered by the U.S. Department of Education. This includes virtually all public schools and school districts, and most private and public postsecondary institutions, including medical and other professional schools. Private and religious schools at the elementary and secondary school levels generally do not receive funds from the U.S. Department of Education and, therefore, are not subject to FERPA.

Q: Does an interagency agreement with partners such as the state or local health department enable a school to non-consensually disclose education records?

A: No. Interagency agreements do not supersede the consent requirements under *FERPA*. Although an interagency agreement would be a helpful tool for planning purposes, schools must comply with *FERPA's* requirements regarding the disclosure of PII from students' education records.

Q: When would the health or safety exception apply?

A: Under *FERPA*, an emergency means a situation in which there is an articulable and significant threat to the health or safety of students or other individuals. This determination must be made by the school.

Q: Do I need to tell parents and eligible students or otherwise document when I have disclosed PII from their education records without consent under a health or safety emergency?

A: Within a reasonable period of time after a disclosure is made under the health or safety exception, a school must record in the student's education records the articulable and significant threat that formed the basis for the disclosure, and the parties to whom the information was disclosed. Parents and eligible students have a right to inspect and review the record of disclosure, but do not need to be proactively informed that records have been disclosed.

Q: Can members of our threat assessment team have access to student education records?

A: School officials with legitimate educational interests may have access to a student's education records. Members of a threat assessment team who are not school employees may be designated as such if they are under the direct control of the school with respect to the maintenance and use of PII from education records; are subject to the requirements of 34 CFR § 99.33(a) governing the use and re-disclosure of PII from education records; and otherwise meet the school's criteria for being school officials with legitimate educational interests.

Members of a threat assessment team who are considered school officials with a legitimate educational interest generally cannot non-consensually re-disclose PII from a student's education records to which he or she was privy as part of the team. However, if a threat assessment team determines that a health or safety emergency exists, members may non-consensually re-disclose PII from a student's education records on behalf of the school to appropriate officials under the health or safety emergency exception.

For example, a representative from the city police who serves on a school's threat assessment team generally could not re-disclose, without consent, PII from a student's education records to the city police during the initial discussions about a particular student. However, once the threat assessment team determines that a health or safety emergency exists, as defined under *FERPA*, the

representative may re-disclose, without consent, PII from a student's education records on behalf of the school to appropriate officials. (See the discussion under "Additional Situations with FERPA Considerations")

FERPA Guidance and Resources

The U.S. Department of Education's Family Policy Compliance Office is available to respond to any questions about *FERPA*. For quick responses to routine questions, please e-mail the Department of Education at FERPA@ed.gov. For more in-depth technical assistance or a more formal response, you may call the Family Policy Compliance Office at 202-260-3887 or write to them at

Family Policy Compliance Office U.S. Department of Education 400 Maryland Ave. SW Washington, DC 20202-8520

For more detailed information or additional guidance, please see the referenced documents and the FPCO website at www.ed.gov/fpco.

See Full Resource From: http://rems.ed.gov/K12FERPA.aspx, then see the "Information Sharing - FERPA" tab on the left

PREVENTION: BEST PRACTICE RECOMMENDATIONS FOR <u>ALL</u> SCHOOLS

From the Review of Psychological Safety and Threat Assessment Issues Related to the Arapahoe High School Shooting

Kanan, L., Nicoletti, J., Garrido, S. & Dvoskina, M., 2016

Some Best Practices <u>Prevention Planning</u> for ALL Schools

- 1. Establishment of a district safety team (safe schools planning team) to provide leadership and vision to coordinate efforts in all phases of a comprehensive safe schools plan and to provide the leadership and monitoring of the broadly defined psychological safety efforts in a district.
 - a. Safety Team https://www.colorado.gov/pacific/cssrc/cssrc-tools-and-templates
- 2. Multi-tiered planning and accountability for prevention and other psychological safety efforts. This helps identify what is expected as best practice at the universal level, for all schools, students, and staff, and what is expected or provided at the other levels of intervention efforts.
 - a. Comprehensive Safety Planning Elements and Tools
 http://cdpsdocs.state.co.us/safeschools/CSSRC%20Documents/CSSRC%20
 Comprehensive%20School%20Safety%20Plan%20Elements%202014.pdf
- 3. Data based decision-making should be used for identification of needs, capacity building, and progress in psychological safety and prevention over time.
 - a. Resource mapping of current district capacity can contribute to the planning and setting of priorities, given the limitations of every district's resources, time, and personnel. The process can then be repeated at school sites. https://www.colorado.gov/pacific/cssrc/cssrc-tools-and-templates
 - b. Nationwide or statewide data will not provide individual schools an accurate picture of their own students or community. Secondary schools are encouraged to participate in the Healthy Kids Colorado Survey or complete climate surveys that can also provide comparison data.
 - c. Resources for climate surveys "at a glance" can be found at https://cdpsdocs.state.co.us/safeschools/CSSRC%20Documents/CSSRC%20Resources%20for%20Climate%20Surveys%20at%20a%20glance.pdf/
 - d. Measuring School Climate Toolkit from the Colorado Education Initiative http://www.coloradoedinitiative.org/resources/measuring-school-climate-toolkit-districts-schools/
- 4. Ongoing accountability and monitoring of prevention and psychological safety efforts, based on the district vision and priorities.

5. The Colorado School Safety Resource Center (CSSRC) has identified a variety of resources that can be helpful to school safety planning and school safety teams. A guide is available to identify key elements for districts and schools. The guide also provides resources for development of a comprehensive safe schools plan and there is an accompanying checklist of the elements for use by a team (CSSRC, 2014a; CSSRC, 2014b).

Some Best Practices in Awareness and Reporting for ALL Schools

- 1. *All members of every school community should be trained* in the indicators of behavioral and emotional concerns, knowledge about multiple reporting systems, and the *importance of timely reporting*.
 - a. Teachers and other school staff need awareness training that includes: identification of the warning signs of troubled kids, 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, and other topics that require reporting. Training should also include the importance of reporting in a timely manner. *This is important at all schools*.
 - b. Parents also need information about recognizing behaviors of concern and the importance of reporting concerns to school staff to obtain possible intervention for their child.
 - c. The student "code of silence" is seen as a strong factor. Adults need to take specific steps to try to address this from an early age. It can be helpful to describe it as "getting help for friends or other people" and that "telling helps keep people safe". Students should be given information about reporting various types of concerns, including threats, and where to report them, including awareness about Safe 2 Tell, any district reporting mechanisms, the National Suicide Prevention Lifeline, and telling a trusted adult at home or at school. The notion that students "are our eyes and ears" stated by the AHS principal is correct (Premanko, 2015).
 - Schools should provide students a review of important policies regarding student code of conduct every year (PBIS model recommends reminders two times a year about key elements of conduct code or behavioral expectations).
 - Safe2Tell has various resources available on its website to assist in training, including discussion questions for high school students (safe2tell.org).
- 2. Teachers are not required to take school law classes, but privacy of school and special education records is often emphasized in education programs. FERPA was designed to protect student education records and *should not be a barrier to*

discussing or reporting personal observations of behaviors of concern. FERPA misunderstandings are evident enough to require a reminder about FERPA to all new and current administrative and teaching staff in all schools. The misunderstandings are also commonplace enough across the country that the Family Policy Compliance Office at the U.S. Department of Education and the Readiness and Emergency Management for Schools (REMS) websites both include information about balancing privacy and safety, the health and safety exceptions to the law, and the misunderstandings of the law on the sharing of personal information (http://familypolicy.ed.gov/faq-page/ferpa-school-officials and http://rems.ed.gov/K12FERPA.aspx). Information on this topic is also presented as part of the Guide for Developing High Quality Emergency Operation Plans (http://www2.ed.gov/about/offices/list/oese/oshs/rems-k-12-guide.pdf. U.S. Department of Education, et al., 2013).

Some Best Practices in Delivery of Mental Health Services for ALL Schools

- 1. All national professional organizations have provided suggested ratios for staff to students in individual schools. Best available data on national recommendations are School Psychologist: 1:500-700, School Social Workers: 1:250, School Counselors: 1:250, and School Nurses: 1:750. Information reviewed from a couple of years ago shows Colorado schools to be staffed at significantly lower than recommended ratios. School districts are encouraged to increase staffing for mental health support as resources allow.
- 2. School mental health support personnel with their training and knowledge are important to the threat assessment and threat management process in schools. Regular professional growth should also include updates and opportunities for peer consultation, knowledge about the availability of community resources, and case practice in threat assessment, suicide prevention, and on other violence prevention topics.

Some Best Practices Using School Discipline as Prevention for ALL Schools

- 1. PBIS principles include a positive approach to discipline that includes teaching behavioral expectations to students. This principle can still be effectively used in schools that are not using other aspects of the PBIS model. Teaching of appropriate behavior should be explicit and should be started in school at an early age. For students of all ages, this includes regular reminders of the behavioral expectations and a continuum of procedures for discouraging rule violations.
- 2. Clarity should be provided to teaching staff about what behaviors are expected to be referred to the office and what the typical behaviors are that they are expected to manage, such as tardiness to class, moderate attendance difficulties, typical misbehaviors, communication with parents, etc.

- 3. Each school should have a method for monitoring and evaluating the effectiveness of the discipline system. Regular review of discipline data can be helpful in that process.
- 4. Collaboration between disciplinary personnel and mental health personnel can be an effective tool to best problem-solve about difficult students and difficult concerns.
- 5. Most importantly, school administrators and disciplinary personnel need regular policy, practice, and legal updates. They also need a skill set to effectively address behavioral issues, including awareness of mental health issues. They need to clearly understand the restrictions and exceptions to FERPA, what information can be shared on a "need to know" basis, and the district's policy and practices on "reasonable suspicion" searches and best practice suggestions in the search of social media.

In Summary: Prevention Recommendations for ALL Schools

Providing good prevention efforts is multi-faceted, and districts and schools are encouraged to think of early, integrated, and coordinated efforts to provide the most benefit to all students. The following prevention recommendations in this report are designed to help *all* districts improve their psychological safety and prevention efforts.

- 1. A district level school safety team (safe schools planning team) is recommended to all districts. An effective team is a representative group from leadership, various safety, prevention, behavioral and special education services, and includes various grade levels to discuss and proactively address the district's needs and services, in all physical and psychological safety areas, Prevention Recovery.
 - a. The purposes of this team would be to assess strengths and gaps in existing services and supports, to set priorities from best practice recommendations, to oversee progress with the district priorities, determine school site expectations and help to determine compliance with best practices in school safety.
 - b. Schools are also encouraged to have a school safety team at the school site level. That team should also meet regularly and plan and review efforts at the school site level. Site based data will then drive variance in site based decisions related to the outline of best practices from the district.
- 2. Psychological safety and prevention is best driven by data. Districts and schools are encouraged to review a variety of existing data regularly to assist in setting priorities and to provide monitoring of their efforts over time.
 - a. Secondary schools are also encouraged to consider the addition of climate or other surveys to gather the view of student attitudes, behaviors, and

- perceptions. A climate survey is best seen as gathering teacher data and parent data also, as possible.
- b. All districts and school will have practical considerations such as funding sources and staff resources regarding implementation of this recommendation. Other considerations include deciding what to measure, whom to survey, the method for surveying, the time required, etc. The resource from the Colorado Education Initiative (2012) can be reviewed for additional items of consideration about surveys and available resources. http://www.coloradoedinitiative.org/resources/measuring-school-climate-toolkit-districts-schools/
- 3. Increased awareness of indicators of behavioral and emotional concerns, knowledge about multiple reporting systems, and the importance of timely reporting should take place *throughout every school and community*. Awareness about district systems for reporting and Safe2Tell should be provided to students and staff in all schools and school districts across Colorado. Information should also be provided to parents and community partners. In the review of the AHS incident, there was information about concerns across the school, the students, the parents, law enforcement and in the community that was not reported or gathered to allow for needed intervention to occur before the tragedy.
 - a. Any effort to support a statewide promotion of the anonymous Safe2Tell system is seen as helpful. The reporting system has been in existence since 2004, yet students, staff and parents may not be aware of it. This is an important addition to safety and prevention efforts.
- 4. FERPA misunderstandings are evident enough to require a reminder about FERPA to new and current administrative and teaching staff in all schools. The misunderstandings are also commonplace enough across the country that the Family Policy Compliance Office at the U.S. Department of Education and the Readiness and Emergency Management for Schools (REMS) websites both include information about balancing privacy and safety, the health and safety exceptions to the law, and the misunderstandings of the law on the sharing of personal information (http://familypolicy.ed.gov/faq-page/ferpa-school-officials and http://rems.ed.gov/K12FERPA.aspx).
- 5. Many professionals in a school help to support students' positive mental health. The mental health personnel mentioned above, school nurses, and other instructional support personnel all work to provide support to students. School-based mental health can serve to support a positive school climate, as well as to provide direct intervention to students. Colorado schools seemed to be staffed at significantly lower levels than national recommendations for school mental health support staff. Given limitations to available resources, it remains a challenge for some districts to meet the recommended standards. Increasing the availability of

mental health resources would likely be beneficial both to individual students and to general school safety.

- a. The teaming work of mental health support staff with administrative and disciplinary staff is important, as it provides integrated efforts from professionals with differing expertise. This teaming approach can also be linked with academic support and community partners. Parents also play an important part in mental health support. School efforts should be aimed at partnering with parents in a variety of ways, in the best interest of kids and safety.
- b. Regular professional development related to crisis prevention, effective intervention, using community partnerships, effective strategies for working with parents, developing a positive school climate, etc. are especially important for these employee groups who provide services to students.
- 6. School administrative and disciplinary personnel need time for continuing education. Some important topics needing regular updates include: best practices in effective discipline, FERPA clarifications, information about identification of indicators of mental health concerns, and "reasonable suspicion" searches.
 - a. Schools should use their own disciplinary data to review consistency and effectiveness of their practices. A review of data may also determine consistency with CDE guidelines and drive topics for continuing education.
 - b. Completion of school threat assessments should be noted in electronic record keeping for individual students. This would help to maintain the knowledge of that data source over time.

Using Protection and Security as Prevention: Recommendations for ALL Schools

1. All campus security or campus supervision staff should have regular training in awareness of behaviors of concern and strategies and skills for best practice in non-violent crisis intervention to help diffuse situations and students and to resolve crises before they become violent.

For Best Practice Threat Assessment Recommendations: See Appendix C from the report

http://www.littletonpublicschools.net/sites/default/files/Kanan%20et%20al.%20AHS%20Report%202016.pdf.

III. Threat Assessment Inquiry Steps

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An inquiry should be initiated immediately in any situation of concern. The threat assessment team should also consider: "How much time do we have?" If at any time information suggests the need for law enforcement assistance, that assistance should be requested immediately.

When a student's behavior or report of behavior and communications deviates from normal behavior for student's peers, and indicates concern to this student's safety or the safety of others, school officials should initiate a threat assessment inquiry for prevention of targeted school violence. The safety of the school, the student and the community is a priority consideration. The student of concern should be immediately and safely contained, based on the severity of the concern, until safety procedures are initiated and assessment process is activated.

Care should be exercised to ensure that a student of concern is treated appropriately, since any allegations regarding the behavior or perceived dangerousness of the student may be unfounded.

The Six Principles of Threat Assessment (Fein, et al., 2002)

- 1. Targeted violence is the end result of an understandable process of thinking and behavior.
- 2. Targeted violence stems from an interaction between the individual, the situation, the setting, and the target.
- 3. An investigative, skeptical, inquisitive mindset is needed.
- 4. Effective threat assessment is based on facts, rather than characteristics or "traits."
- 5. An "integrated systems approach" is best.
- 6. Investigate whether or not a student *poses* a threat, not whether a student has *made* a threat.

Basic threat assessment inquiry steps include:

- 1. ASSEMBLE THE THREAT ASSESSMENT TEAM.
- 2. GATHER A VARIETY OF INFORMATION.
- 3. USE MULTIPLE DATA SOURCES.
- 4. ORGANIZE AND ANALYZE THE INFORMATION.
- 5. DETERMINE THE LEVEL OF CONCERN LEADING TO AN ACTION PLAN.
- 6. DEVELOP AN ACTION AND SUPPORT PLAN.
- 7. DOCUMENT THE THREAT ASSESSMENT AND KEEP RECORDS FOR THE INFORMATION "VORTEX".
- 8. CONTINUE MONITORING OF THE STUDENT AND THE EFFECTIVENESS OF THE PLAN.

Threat Assessment: Secret Service Eleven Key Questions

Colorado School Safety Resource Center 03.19.2010

Threat Assessment Inquiry: A Summary of the Secret Service Eleven Key Questions

How should the information from a threat assessment inquiry be organized and analyzed? Information from research and interviews conducted during a threat assessment inquiry should be guided by the following 11 key questions:

- 1. WHAT ARE THE STUDENT'S MOTIVES AND GOALS?
- 2. HAVE THERE BEEN ANY COMMUNICATIONS SUGGESTING IDEAS OR INTENT TO ATTACK?
- 3. HAS THE SUBJECT SHOWN INAPPROPRIATE INTEREST IN SCHOOL ATTACKS OR ATTACKERS, WEAPONS, INCIDENTS OF MASS VIOLENCE?
- 4. HAS THE STUDENT ENGAGED IN ATTACK RELATED BEHAVIORS?
- 5. DOES THE STUDENT HAVE THE CAPACITY TO CARRY OUT THE ACT?
- 6. IS THE STUDENT EXPERIENCING HOPELESSNESS, DESPERATION OR DESPAIR?
- 7. DOES THE STUDENT HAVE A TRUSTING RELATIONSHIP WITH AT LEAST ONE RESPONSIBLE ADULT?
- 8. DOES THE STUDENT SEE VIOLENCE AS AN ACCEPTABLE OR DESIRABLE WAY TO SOLVE PROBLEMS?
- 9. IS THE STUDENT'S CONVERSATION AND "STORY" CONSISTENT WITH THEIR ACTIONS?
- 10. ARE OTHER PEOPLE CONCERNED ABOUT THE STUDENT'S POTENTIAL FOR VIOLENCE?
- 11. WHAT CIRCUMSTANCES MIGHT AFFECT THE LIKELIHOOD OF VIOLENCE?

Use the information gathered to help determine the seriousness of the concern and to develop the action and support plan.

Explanation of the Secret Service Eleven Key Questions

1. WHAT ARE THE STUDENT'S MOTIVE(S) AND GOALS?

- a. What motivated the student to make the statements or take the actions that caused him or her to come to attention?
- b. Does the situation or circumstance that led to these statements or actions still exist?
- c. Does the student have a major grievance or grudge? Against whom?
- d. What efforts have been make to resolve the problem and what has been the result? Does the potential attacker feel that any part of the problem is resolved or see any alternative?

2. HAVE THERE BEEN ANY COMMUNICATIONS SUGGESTING IDEAS OR INTENT TO ATTACK?

a. What, if anything, has the student communicated to someone else (targets, friends, other students, teachers, family, others) or written in a diary, journal, or website concerning his or her ideas and/or intentions?

3. HAS THE SUBJECT SHOWN INAPPROPRIATE INTEREST IN ANY OF THE FOLLOWING?

- a. School attacks or attackers;
- b. Weapons (including recent acquisition of any relevant weapon);
- Incidents of mass violence (terrorism, workplace violence, mass murderers).

4. HAS THE STUDENT ENGAGED IN ATTACK-RELATED BEHAVIORS? THESE BEHAVIORS MIGHT INCLUDE:

- a. Developing an attack idea or plan;
- b. Making efforts to acquire or practice with weapons;
- c. Casing or checking out possible sites and areas for attack;
- d. Rehearsing attacks or ambushes.



Threat Assessment: Secret Service Eleven Key Questions

Colorado School Safety Resource Center 03.19.2010

5. DOES THE STUDENT HAVE THE CAPACITY TO CARRY OUT AN ACT OF TARGETED VIOLENCE?

- a. How organized is the student's thinking and behavior?
- b. Does the student have the means, e.g., access to a weapon, to carry out an attack?

6. IS THE STUDENT EXPERIENCING HOPELESSNESS, DESPERATION AND/OR DESPAIR?

- a. Is there information to suggest that the student is experiencing desperation and/or despair?
- b. Has the student experienced a recent failure, loss and/or loss of status?
- c. Is the student known to be having difficulty coping with a stressful event/
- d. Is the student now, or has the student ever been, suicidal or "accident-prone"?
- e. Has the student engaged in behavior that suggests that he or she has considered ending their life?

7. DOES THE STUDENT HAVE A TRUSTING RELATIONSHIP WITH AT LEAST ONE RESPONSIBLE ADULT?

- a. Does this student have at least one relationship with an adult where the student feels that he or she can confide in the adult and believes that the adult will listen without judging or jumping to conclusions? (Students with trusting relationships with adults may be direct away from violence and despair and toward hope.)
- b. Is the student emotionally connected to or disconnected from other student?
- c. Has the student previously come to someone's attention or raised concern in a way that suggested he or she need intervention or supportive services?

8. DOES THE STUDENT SEE VIOLENCE AS AN ACCEPTABLE – OR DESIRABLE – OR THE ONLY WAY TO SOLVE PROBLEMS?

- a. Does the setting around the student (friends, fellow students, parents, teachers, adults) explicitly or implicitly support or endorse violence as a way of resolving problems or disputes?
- b. Has the student been "dared" by others to engage in an act of violence?

9. IS THE STUDENT'S CONVERSATION AND "STORY" CONSISTENT WITH HIS OR HER ACTIONS?

a. Does information from collateral interviews and from the student's own behavior confirm or dispute what the student says is going on?

10. ARE OTHER PEOPLE CONCERNED ABOUT THE STUDENT'S POTENTIAL FOR VIOLENCE?

- a. Are those who know the student concerned that he or she might take action based on violent ideas or plans?
- b. Are those who know the student concerned about a specific target?
- c. Have those who know the student witnessed recent changes or escalations in mood and behavior?

11. WHAT CIRCUMSTANCES MIGHT AFFECT THE LIKELIHOOD OF AN ATTACK?

- a. What factors in the student's life and/or environment might increase or decrease the likelihood that the student will attempt to mount an attack at school?
- b. What is the response of other persons who know about the student's ideas or plan to mount an attack? (Do those who know about the student's ideas actively discourage the student from acting violently, encourage the student to attack, deny the possibility of violence, passively collude with attack, etc.?)

Adapted from: Fein, R., Vossekuil, B., Pollack, W., Borum, R., Modzeleski, W., & Reddy, M. (2002). *Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates*. Washington, DC: United States Department of Education, Office of Safe and Drug Free Schools Program and U.S. Secret Service, National Threat Assessment Center.



I: QUESTIONING ABOUT THE BEHAVIOR OF CONCERN
II: CONFRONTING INAPPROPRIATE BEHAVIOR OR COMMENTS
III: CONSEQUENCES FOR ACTIONS
IV: INCREASED MONITORING OF STUDENT
V: SKILL DEVELOPMENT
VI: RELATIONSHIP BUILDING
VII: TREATMENT RECOMMENDATIONS
VIII: PROTECTIVE MEASURES

These suggestions were generated by staff in various schools that have dealt with concerns about student behavior. These can be used to help guide questioning and to use for intervention planning with students of concern. This list is not exhaustive, and not in order of importance. Schools are encouraged to create their own ideas for intervention. Document your Action and Supervision Plan as a behavior contract agreed upon at re-entry of student. Student, parents and school should all have responsibility for parts of the plan and sign the plan. ALWAYS review the effectiveness of your plan!

- 1. Ask direct questions. "What did you mean by that comment (writing, drawing, etc.)? What were you thinking about when you said it?"
- 2. Ask about specifics using the students own words, writing, etc. "What did you mean by life is not worth living?" Then, listen!
- 3. Ask about what preceded the behavior of concern. What was the "trigger?"
- 4. Share how others might interpret comments, writings, and drawings.
- 5. Describe the student's behavior as considered a possible threat. Direct, indirect, conditional, or veiled.
- 6. Tell child that the behavior is not acceptable. Use PBIS language of school-wide expectations as your language for communication. For low level concerns, let them know what will happen if the behavior occurs again. Then, follow through!
- 7. Always share information with and get information from parents. Ask parents about behavior at home and in the community. Are there other behaviors or comments of concern?
- 8. Request that parents come to school for a meeting.

- 9. Always discuss warning signs and concerns with parents.
- 10. Document and share with the student's parents the number of referrals, teacher concerns, time spent in office/time out, etc.
- 11. Ask parents to provide additional home consequences and monitoring.
- 12. Ask directly about an angry or suicidal students' access to and ability with firearms and other weapons.
- 13. Engage in problem solving with the student. Help mediate known or potential conflicts.
- 14. Consider whether the student has an adult with whom they are connected at school. Can this relationship be utilized or facilitated?
- 15. Is the child in an extra-curricular activity for pro-social development?
- 16. Review students' strength areas. Can these be used to build positive behavior?
- 17. Require that the student apologize to the target of their comment or behavior.
- 18. Use in-school suspension and/or time-out for inappropriate choices.
- 19. Assess the students' academic progress. Is this student frustrated with academic demands? Can additional academic supports be put into place?
- 20. Use out-of-school suspension when behavior warrants. Be sure to have a reentry meeting to review and revise plan for school.
- 21. Have administrator and SRO in the meeting with student and parent to impress the seriousness of issue.
- 22. Involve outside agencies and/or therapist that may be working with the student/family. Get releases signed, and initiate contact so that the team can work together to provide interventions.
- 23. Invite probation officer, caseworker, and/or therapist to meeting at school.

- 24. Is there a guardian ad litem appointed by the court? Get permission for verbal contact with them or invite them to meeting.
- 25. Has the student been involved in the Student Attendance Review Board (SARB) process? Be sure SARB is notified of all the areas of concern about a student.
- 26. Prohibit or restrict bus privileges, as appropriate.
- 27. Ask the School Resource Officer to have a talk with the student and consider if the behavior violates laws.
- 28. Include the School Resource Officer in the school threat assessment and intervention planning meetings.
- 29. Initiate regular or random searches of the students backpack, desk. Ask parents to initiate home searches as well. Set this up as part of your intervention plan with parents' knowledge.
- 30. Eliminate as much unsupervised time as possible during the students' school day to increase monitoring. Eliminate off periods and shorten the day, if necessary.
- 31. Ask the parent to come to school with the child for a day or more to observe the child in the school environment.
- 32. Ask teachers to complete behavioral checklists to gain additional information from them. What are their observations and concerns and student strengths and weaknesses? What interventions have been successful?
- 33. Be proactive in planning teacher(s) or classes for this student. Structure and consistency may be important. Is this teacher or classroom a good fit for the students' needs?
- 34. How can the student earn positive rewards/feedback for good behavior? Can you tie this to school-wide system if your school uses PBIS concepts?
- 35. Initiate a regular communication system with the parents. Use a daily behavior card. etc.

- 36. Make a plan for recess, off-hours, and lunch. Does the student need more supervision?
- 37. Does the student need regular contact with a mental health support staff person at school? Is there an appropriate support group at school? Document attendance.
- 38. If the student is in Special Education: conduct a Functional Behavioral Assessment (FBA) to help evaluate factors contributing to behavior, and write, review, or revise the Behavior Intervention Plan (BIP) to address the behavior of concern.
- 39. Use the Response to Intervention (RTI) process to help guide your intervention planning and data gathering with a regular education student.
- 40. ALWAYS schedule a review meeting to monitor the effectiveness of your action plan. This will help hold the student accountable, provide continued communication with the family, and provide an opportunity to acknowledge success.
- 41. If there is an outside treatment provider, ask parents to sign a release of information to exchange information. Coordinate efforts to monitor and provide intervention. If parents refuse, document! Follow up!
- 42. Place the student on a Habitually Disruptive Student Behavior Plan, <u>if</u> behavior warrants, following district guidelines.
- 43. Consider use of a "check in-check out" system for monitoring, building relationships, and to reinforce improved behavior. Be specific about the system. Review the effectiveness, and fade off as behavior warrants.
- 44. Prohibit or restrict school internet privileges, as warranted.
- 45. Use the Problem-Solving Team process at your school.
- 46. Ask for consultation from the district Safe Schools Team, Threat Assessment Review Team, or administrative team.
- 47. Consult with others. What other interventions have been successful?
- 48. Add to this list!

BEST PRACTICE THREAT ASSESSMENT RECOMMENDATIONS FOR ALL SCHOOLS

From the Review of Psychological Safety and Threat Assessment Issues Related to the Arapahoe High School Shooting

Kanan, L., Nicoletti, J., Garrido, S. & Dvoskina, M., 2016

While most schools throughout Colorado and the country have been using a threat assessment process for years, this arbitration allowed the reviewers to look into specific implementation of the process through an examination of a select sample in one district and one school. The following best practice recommendations are made after review of information provided in this arbitration and are provided for *all schools* regarding the process, training, intervention planning and documentation of threat assessments in schools. All school districts and schools are encouraged to use the lessons learned and the information provided in this report to review their process, training and documentation of threat assessments and interventions for threat management.

Best Practice Recommendations for School Threat Assessment Process

- **1.** One of the key elements in identifying a student in crisis or interrupting a potential school attack situation is *early detection*. The foundation for the threat assessment process involves raising awareness for detection of potential behaviors of concern, and about the timely reporting of those concerns. Awareness training must occur across school employee groups, students, parents, and others in the community. Multiple reporting methods for concerns are encouraged, as long as the vortex for information is established. See Section II of this report.
- **2.** Each district is encouraged to review the training and experience of its administrators, mental health personnel, and others who might be members of a threat assessment team, to determine if the multi-disciplinary site-based 3-person threat assessment team model, as recommended by the CSSRC, can be implemented at their schools. Any gaps should be remediated.
- **3.** Given the potential difficulty of assuring the training, and in some cases, the limited experience of site based administrators and mental health personnel, a designated district level subject matter expert or review team is recommended to be available for review, consultation, training, and participation in difficult cases, as needed.
- **4.** The process should be consistent between a district level review team and school based threat assessment teams. The process should also be consistent across schools in each district.

- **5.** The vortex for information reporting and consolidation should be established at each school. It is considered best practice if the vortex is a team, to reduce unilateral decision-making regarding the significance of behavioral data and threat assessment.
- **6.** An outline of the key considerations in the process:
 - a. Securing safety should be a priority.
 - b. Notifications about the need for a threat assessment should occur and the threat assessment team should be convened.
 - c. Information should be obtained from a variety of sources, including:
 - Searches of the person, as appropriate,
 - Searches of social media,
 - Reviews of school and other available records,
 - Information and observations from teachers or others at the school who know the student, and
 - Information from community treatment providers or other agencies providing intervention to the student.
 - d. Special Education considerations should be reviewed and appropriate staff included in the process.
 - e. Interviews should be conducted with the student of concern, parents of the student of concern, and witnesses (if relevant). This is best done *outside* of a meeting and should be conducted prior to the meeting where a plan is developed.
 - f. All data should be reported in behavioral terms, when possible, and all data should be considered and evaluated.
 - g. Organization and analysis of the information should occur.
 - h. Decision-making should take place regarding the seriousness of the behavior by reviewing all the data sources. The foundation for the level of risk should be based on all the behaviors over time and the detail for the determination of risk should be recorded. Decision-making can be assisted by a system for behavior analysis and coding (Nicoletti model) and the Secret Service 11 Key Questions.
 - i. Appropriate action and intervention planning (countermeasures) should be commensurate with level of concern.
 - j. Identify strengths or relationships that can be developed, include specific steps of plan, details of monitoring, and people responsible for the action items (including the parent and student).
 - k. Monitoring of student and review of the plan should be clear Identify personnel who are the points of contact and establish a firm date for review of the effectiveness of the plan.
 - 1. A documentation form should be completed, in detail, with the foundation for the level of risk. Records should be maintained, as directed by the district.
 - m. Review the effectiveness of the plan, student progress and document the follow up review meeting.
- 7. It is recommended that someone with experience and expertise at the central district office level and/or a district level team review the assessment and the action and intervention plan.

- 8. Central district record keeping should also be maintained. Cases reviewed by the threat assessment team at the school and district should be classified according to some follow up system such as:
 - a. Currently active and under review
 - b. Active with proactive monitoring of behavior and countermeasures
 - c. Inactive with reactive monitoring, as needed.

Best Practice Recommendations for Training School Employees in Threat Assessment

- 1. All school employee groups should be trained for awareness of violence or concerning behavior and the importance of timely reporting.
 - a. All students should also be trained about the importance of reporting.
 - b. Parents should also be educated and reminded about the importance of reporting behaviors of concern, for the safety of their child and the safety of others.
 - c. Schools must continue efforts to partner with parents for early intervention for kids exhibiting concerning behaviors.
 - d. Multiple methods of reporting are encouraged, as long as the vortex for information is established and used.
- 2. All school district employees acting as part of a threat assessment team should be trained, including administrators. Updated training should be required at regular intervals (every 2-3 years). Attendance at trainings should be documented.
- 3. Law enforcement officers (SROs) acting as part of a school based threat assessment team should also participate in the district threat assessment training process or similar training.
- 4. When possible, teams should train or practice together. Much as schools are encouraged to drill and practice other types of emergency response procedures, threat assessment teams can also benefit from case practice.
- 5. Face-to-face training should always include review of any topics that are covered in handouts, support, or resource documents. Any supporting or resource documents provided in training should also be available on the district intranet.
- 6. Sufficient time must be dedicated to training on the important topic of threat assessment. Covering many related topics in one training session may be efficient and help to make connections of learning for staff, but this and other safety topics need dedicated training time. School and district leadership must support that training.

- 7. Best practice threat assessment training should include:
 - a. Information content about the history of school related violence incidents and lessons learned.
 - b. Clarity about *when* to do a threat assessment as stated in district information and policy.
 - c. Clarity about the composition of a Threat Assessment Team, including attendance by a Special Education representative, if the student has an identified disability. The CSSRC (2010-2015) has recommended at least three trained members to a team.
 - d. Six principles of threat assessment from the Secret Service recommendations (Fein, et al., 2002, 2004) to remind participants of the need for a skeptical mindset, basing information on facts, using integrated systems.
 - e. Training and *emphasis* on relevant FERPA exceptions to confidentiality, as misperceptions still exist regarding this law and relevant exceptions (CSSRC, 2010-2015).
 - f. Training for awareness of and *appropriate use* of warning sign indicators (Dwyer et al., 1998; CSSRC, 2010-2015; and others). These warning signs are for awareness of troubled students, and not necessarily students who are dangerous or pose a risk for violence. They should not be used as a checklist for violence as they not all equal in importance or as indicators (Dwyer et al., 1998; Cornell, 2014).
 - g. Ten Key Findings from the Safe School Initiative (Fein, et al., 2002), as this information still applies, and can be useful in awareness training. These findings relate to information that should be questioned during a threat assessment process.
 - h. Teach information for awareness of avenger violence (Nicoletti, 2013, 2014)
 - i. Teach and give examples of how to evaluate written material (Kanan, 2010, 2011, 2013).
 - j. Teach how to identify each type of threat for correct coding of behaviors (direct v. indirect, conditional, veiled, etc.) (O'Toole, 2000, Nicoletti, 2010).
 - k. With regard to the "Access to Weapons" question, it is recommended that those completing these forms be trained to only mark "none known" after taking reasonable steps to ascertain the information. Document the attempt to gather information related to an armament.
 - Training should specify that both the student and their guardian should be asked directly if there are weapons in the home, if the student has access to weapons, and if they have had training. Specific responses should be noted.
 - 1. Train for evaluation of materials obtained. If the form directs the decision to assign a category for level of concern, examples and explanation should be provided.
 - m. Teach about the identification and coding of behavior as "normal", "boundary probing" "attack related" or "attack" for use in determining level of concern. (Nicoletti, et al., 2010; Nicoletti & Spencer-Thomas, 2002).
 - n. Use of the 11 Key Questions for the Secret Service should be reviewed and explained.
 - o. Teach how to create effective intervention plans commensurate with the level of concern and provide suggestions for monitoring.

- Examples of effective intervention planning (countermeasures) should be provided. All students who engage in behavior that prompts a threat assessment should be monitored over time.
- p. Train for each step of the district process, in addition to reviewing the form.
- q. Teams should use case studies for tabletop practice in threat assessment.
- r. Participants in trainings should be asked to complete a short evaluation to assess the effectiveness of the training, the presentation materials and format and to provide suggestions for future training. This will help assess which topics may need more information or additional training.

Best Practices Recommendations in Documentation of Threat Assessment and the Intervention Plan

- 1. All school district documentation forms should be reviewed to assure the form helps to guide less experienced school personnel through the district's process of threat assessment.
- 2. All school district Threat Assessment documentation forms should be reviewed for single prompts and contain sufficient additional space after each prompt for addition of clarification and/or evidence of the box checked.
- 3. A section for all the recommended data sources to be used in the assessment should be included.
 - a. As mentioned in the process above, a search of social media activity *should be included as standard practice* as part of threat assessment process. Social media should consistently be searched and screenshots of any concerning posts, pictures, quotes, etc. should be included in documentation. Students can be asked to show their social media directly, parents should be involved, and law enforcement consulted, as needed. Consultation with school district attorneys can provide more guidance on reasonable suspicion in this type of search.
- 4. Documentation forms need to include a step to *evaluate available information* before any decision-making and intervention planning.
 - a. Careful examination of behaviors and coding using the concepts of "normal", "boundary probing", "attack-related", and "attack planning" are useful for evaluation.
 - b. Available guidance for school threat assessment continues to advocate for the use of the Secret Service 11 Key Questions as part of a threat assessment form and process in schools (CSSRC, 2015).
- 5. The intervention or action plan developed as part of a threat assessment *should be detailed, with appropriate steps, persons responsible to follow-up, and a date established for review of the plan* before the meeting is concluded.

- 6. All threat assessments should have intervention or action planning, *including monitoring* of the student. More examples of items to be used and blanks for other interventions the school-based team may create could be added to documentation forms.
 - a. A Point of Contact (POC) should be identified and assigned to any student requiring a threat assessment and whenever possible, the POC would ideally be a school psychologist or other mental health staff member uniquely qualified to provide ongoing behavioral assessment and monitoring.
 - b. Initially, a student that has engaged in a behavior requiring the completion of a threat assessment should be required to complete daily or weekly check-ins to assess their willingness and ability to comply with limit setting. Some suggestions for check-ins should be provided.
 - c. There should be specificity to the check-in with students. Specify if the backpack, notebooks, locker, or social media pages will be checked or if check-in consists of verbal confirmation that things are going well. Document the check-in and specify what will happen if a student misses a check-in.
- 7. If the student does not comply with the required check-in or action steps (countermeasures), this may indicate a higher risk, as the student is demonstrating they are choosing to disregard rules or is incapable of controlling his or her impulses.

Key Findings and Recommendations From the Trend Analysis and Specific Case Review

- 1. Faculty and staff need to be trained on a standard protocol for detecting and reporting concerning behaviors as recommended in Section II of this report.
- 2. Students also need to receive training to notice concerning behavior ("what to look for") and how to report concerns, as in Section II.
- 3. There should be a variety of options for reporting concerns, such as: Safe2Tell, the district safety and security number, notifying the school administration, the school resource officer, counselor, school psychologist, teachers, parents, or others. However, all of these options need to filter to the centralized vortex.
- 4. Unilateral risk assessment should be avoided. *If you see something or hear something, say something*, and always consult with others to avoid unilateral assessments.
- 5. Data should be collected from multiple sources within and outside of the school, including from parents and caregivers, mental health professionals, and social media sources.
- 6. Concerning behaviors need to be appropriately documented *in behavioral terms* that make it clear what specifically was said or done that was of concern. Vague statements such as "he was awkward" or "his statement's were bizarre" should be avoided. Record

specific language use and save concerning writings or drawings for a record of *exact* content.

- 7. Threat assessment forms should be standardized and guide personnel, especially less experienced ones through the process of data gathering, consideration of risk, and the creation of an intervention plan. Behavior must be looked at over time. A specific review date should be established to review the effectiveness of the plan.
- 8. Threat assessment team members should avoid diagnosing emotions and *focus on the behavioral indicators*.
- 9. Any concerning behavior should be met with an intervention (countermeasure), and each countermeasure should be *monitored for effectiveness*. Again, reviewing behavior over time and the effectiveness of the countermeasures over time can be helpful to determine a pattern.
- 10. Cases reviewed by the threat assessment team at the school and district should be classified according to some follow up system such as:
 - a. Currently active and under review
 - b. Active with proactive monitoring of behavior and countermeasures
 - c. Inactive with reactive monitoring, as needed.

For other prevention best practice recommendations from the report, go to: http://www.littletonpublicschools.net/sites/default/files/Kanan%20et%20al.%20AHS%20Re port%202016.pdf.