



Pennsylvania Commission on Crime and Delinquency | K-12 Threat Assessment Training: Train the Trainer Manual



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REVISION HISTORY

CONTRIBUTORS

These training materials were developed under contract to PCCD by [Risk and Strategic Management, Corporation](#) (RSM – a [Sigma](#) company).¹ RSM offer the thanks to the following in providing valuable contributions:

- The Virginia Department of Criminal Justice Services (VA DCJS) for permitting RSM to draw on materials developed by RSM under contract to DCJS for the benefit of this project. RSM have developed Threat Assessment and Management training for all VA Public Schools, and training for K-12 School Security Officers for DCJS, aspects of which have informed the development of this K-12 Threat Assessment training for PCCD.
- Dr Gene Deisinger; Threat Management Consultant to the Virginia Center for School and Campus Safety, and to the Virginia State Police/Virginia Fusion Center; Deisinger Consulting, LLC. Dr. Deisinger is a nationally recognized behavioral threat assessment and management expert and published author on the subject and is the former Deputy Chief of Police and Director, Threat Management for both Virginia Tech and Iowa State Universities. Dr. Deisinger's copyrighted STEP[®] framework developed in his work with Marissa R. Randazzo and referenced throughout the training material, provides a valuable framework for organizing and interpreting information pertaining to behavioral threat assessment and management. STEP[®] has been authorized for use in these materials.²
- Our subject matter experts:
 - Dr. Terri A. Erbacher, Private Practice, Erbacher Consulting Associates, internationally published author on suicide risk prevention, intervention and postvention; School Psychologist, Delaware County Intermediate Unit.
 - Dr. Melissa Nelson, Private Practice, mental health clinician, teacher-counselor, and advocate in various psychiatric, mental health, and legal settings.
 - Dr. Tori Stone, licensed counselor, Associate Professor and the Clinical Coordinator of the Counseling program at George Mason University.
 - Dr. Dolores Robison; Threat Management Supervisor, Prince William County Schools, Virginia; K-12 Threat Assessment and Management, LLC.
 - Dr. Kirby L. Wycoff, Program Director, Community and Trauma Counseling; Associate Professor, Counseling and Behavioral Health Department, Thomas Jefferson University, College of Health Professionals.
 - Dr. Susan Tarasevich, lead trainer in the Pennsylvania Student Assistance Program with Addiction Medicine Services of UPMC-Western Behavioral Health, and an independent facilitator for the Pennsylvania Positive Behavioral Interventions and Supports Network.
 - Sherry Peters; formerly Bureau Director for Policy, Planning and Program Development in the Office of Mental Health and Substance Abuse Services (OMHSAS); and Adjunct Faculty, Georgetown University Center for Child and Human Development.

¹ The project has been funded through sub award (2019-SZ-SV-32697) from funding through the DOJ, Bureau of Justice Assistance.

² Any reproduction of STEP[®] in documentary, pictorial or digital form should appropriately cite: © Gene Deisinger and Marissa R. Randazzo, 2008.

- *Mary Garrett Itin, Private Practice, licensed social worker, and working across the full scope of the child-serving system including child welfare, juvenile justice, mental health/behavioral health, education, and developmental disabilities.*

... and to PCCD and the wider School Safety and Security Committee and state agencies for their support throughout.

K-12 THREAT ASSESSMENT TRAINING | TRAIN THE TRAINER MANUAL

INTRODUCTION

This Train the Trainer (T3) Manual is designed to provide those both delivering **and** attending the T3 sessions with a detailed resource to be referenced during both the T3 session and, as required, once trained and delivering K-12 Threat Assessment training to their own participant groups in Pennsylvania. The Manual provides T3 Facilitators with guidance on how to run T3 sessions, and K-12 Threat Assessment trainers with guidance on how to deliver Threat Assessment training to K-12 Threat Assessment Team members and other relevant stakeholders, consistent with the [Model PCCD Procedures and Guidelines](#).

The Manual is detailed. It assumes a very high level of competence in the delivery of professional development sessions and aims to concurrently build a high level of Threat Assessment and Management knowledge – both of which will be needed when delivering training to their own participant groups. The Manual comprises:

- **Part A:** The T3 delivery approach recommended by PCCD.
- **Part B:** Representations of the slides used in the PowerPoint presentation that accompanies the K-12 Threat Assessment training and narrative commentary to each slide, providing trainers with sufficient detail to explore the summarized content found on the PowerPoint slides, and guidance on how to encourage participation from those attending the session.
- **Part C:** Appendices as follows:
 - **1. The Threat Assessment and Management Integrated Process Flowchart and Case Management Form:** A flowchart depicting the steps and 'flow' that show how Threat Assessment and Management are conducted. This flowchart forms a framework that will be continuously referred to throughout the training to help in organizing participants' understanding of the Threat Assessment and Management process. While some school entities may already have processes in place, they should be reviewed in the context of this flowchart to ensure fundamental steps are included. As with the process flowchart, it is recognized that individual School Divisions may have developed their own format for documenting Threat Assessment and Management cases, and the case management form provided here is a model approach (with fidelity to the PCCD Model K-12 Threat Assessment Procedures and Guidelines) capable of application – with modification as required – in a wide range of contexts. It is color-coded to facilitate integration with the process flowchart.
 - **2. Descriptive Statements of the Threat Assessment Classifications:** These provide a key reference, as the benchmark descriptive statements that inform the classification of an

assessed threat (the level of concern presented by the student posing a threat of violence and the situation and how this classification interacts with the determination as to whether a threat is regarded as Transient or Substantive).

- **3. Pennsylvania State Law (Article XIII-E - Threat Assessment):** This is a verbatim record of Article XIII-E, wherein, by Act 18 of 2019, the Pennsylvania Public School Code was amended to include the establishment and operation of Threat Assessment processes and Threat Assessment Teams.
- **4. Action Steps to Enhance the Approach to Threat Assessment:** Provides a format for participants to note down observations and reflections on what they are learning as it applies to their context. K-12 Threat Assessment trainers will refer to this Action Steps format, and guide participants on how to use it in recording action items things they might individually or collectively (within Threat Assessment Teams) commit to doing. These action items might relate to reinforcing strengths and taking immediate opportunities associated with their current Threat Assessment and Management approach, or to address current gaps or weaknesses as these are identified through the training or are already recognized.

PART A: T₃ DELIVERY APPROACH

Here we set out the approach to delivery of the T₃ sessions used to prepare PCCD K-12 Threat Assessment trainers.

AIM

The aim of the T₃ program developed by PCCD is to create a cadre of trainers across Pennsylvania capable of delivering training in this subject area to a consistent and high standard.

NATURE OF T₃ ATTENDEES

T₃ attendees will be drawn from current school entity personnel from across the Commonwealth, as well as other professionally competent individuals working in support of K-12 education. Ideally, they should meet the following criteria:

- **Criteria 1 | K-12 Threat Assessment and Management Subject Matter Expertise:** Participants with relevant professional experience and expertise in areas related to building positive, safe, and secure school environments (such as administrators, School Safety and Security Coordinators, School Psychologists, School Counselors, etc.). Individuals with subject matter expertise in threat assessment and management are also encouraged to participate in this training to understand delivery of these practices in Pennsylvania school settings.
- **Criteria 2 | Professional Development Training Delivery Expertise:** Experience in delivering professional development training in Threat Assessment and Management, school safety and security, or directly related fields to K-12 educational personnel (teaching and administration) and/or K-12 school counseling, social work or psychology professionals.

The training and the T3 model have been developed recognizing that those attending the training may have greater levels of knowledge and experience in specific subject domains. In addition to gaining familiarity with the recommended training delivery approach and materials, all will leave the training with a common understanding of current good practice and have the tools to answer questions arising from detailed exploration of subject areas that, prior to the training, they may have had less knowledge of than other subject areas.

T3 METHODOLOGY | MODEL > EXPLORE > RE-MODEL

The T3 runs over a full day (8 hours), providing opportunity to explore in detail aspects of what will, ultimately, be delivered to their own training audiences.

The T3 methodology employs the Model > Explore > Re-Model approach; appropriate to the fact that T3 attendees are experienced professionals in their own right. In overview:

- **Model:** The T3 Facilitator will model sections of the training, as if delivering these to a K-12 Threat Assessment training session. The Facilitator, based on the nature of the T3 attendee group and their reading of the room, should determine how much of the training to model before exploring the modeled section in more detail. This requires skill on the part of the Facilitator; breaking the modeled delivery too frequently will create a staccato tempo to the training that will mean the T3 attendees may be less able to develop a feel for how the training 'flows'. Conversely, modeling long sections of the training with no break will limit the opportunities to explore important questions and aspects of the training as they are crystallizing in the minds of the T3 attendees. T3 Facilitators are advised to work through the materials themselves to determine where natural breakpoints would be based on the nature of the T3 attendees (the details of the attendees will be passed to the Facilitator by the PCCD Threat Assessment Program Coordinator prior to the T3 session being run). This will provide a framework they can use that can then be adapted on the day, as feedback from the group drives a need to slow down and focus more closely on specific subject areas.
- **Explore:** At pre-identified or attendee-driven break points, modeling stops, and the Facilitator and attendees can then explore subjects in more detail, whether this is:
 - The training content itself.
 - The proposed training delivery mode (such as understanding in more detail how a group discussion exercise might work, or how to extract most value from a video section).
 - Likely questions or observations arising when the training is delivered to a K-12 Threat Assessment training session, enabling the T3 attendees to 'get ahead' of complex, contentious or highly subject matter-specific points in the training and discuss ways of dealing with these with the Facilitator and within the T3 group.
- **Re-Model:** Based on the exploration step, if required, the Facilitator may re-model aspects of the training, including how training may be adapted to deal with different K-12 Threat Assessment participant groups. In doing so, Facilitators should ensure fidelity is maintained with the scope of the training materials, even where the content or delivery mode is adapted to more appropriately fit the local context. This is because the training's scope has been developed to explicitly align to the Model PCCD K-12 Threat Assessment Procedures and Guidelines.

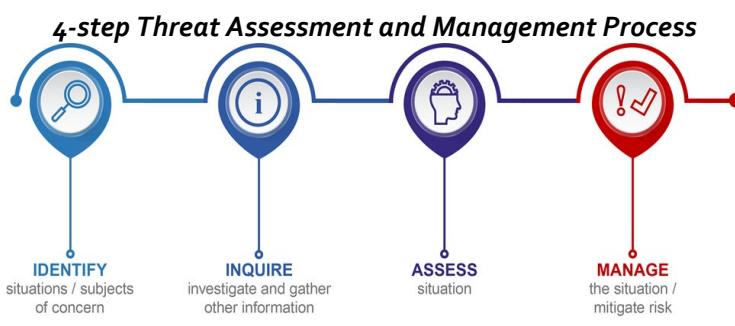
NATURE AND CONTENT OF THE K-12 THREAT ASSESSMENT TRAINING

The training materials have been developed to align directly with the PCCD Model K-12 Threat Assessment Procedures and Guidelines, and subsequent review process undertaken by a multi-agency Stakeholder Reference Group under PCCD. K-12 Threat Assessment trainers can therefore have confidence in the materials. Where clarification is required or, as Subject Matter Experts in their own right, potential revisions are identified, these should be raised to the PCCD Deputy Director, School Safety.

The content is not intended to provide a script to be dogmatically followed. It is intended to provide a consistent base of PCCD-endorsed information, consistent with the PCCD Model K-12 Threat Assessment Procedures and Guidelines, federal and state law and peer agency guidance (e.g., PDE's Office for Safe Schools). K-12 Threat Assessment trainers should therefore be mentored in how to use the materials: Ensuring all subject domains are covered, that key concepts and principles are understood and that all points of technical/factual basis are delivered to training participants. As discussed in the 'Re-Model' paragraph above, it is well-recognized that the local context within which the training is delivered and in which the school entities operate will vary and, necessarily, Facilitators should feel confident to adapt the materials to ensure they are contextually nuanced while maintaining fidelity to the technical scope.

The **outcome** is the **focus**: To develop the knowledge and skills in Pennsylvania K-12 Threat Assessment Teams to carry out Threat Assessment and Management that is fully consistent with the mandated responsibilities of these teams specified in the PA Public School Code (Article XIII-E). Most importantly, the training supports Teams in identifying students posing a threat of violence and intervening as early as possible to remove them from a pathway to violence or self-harm. This will optimize schools' ability to intervene positively with students posing a threat of violence, protecting potential targets and the student posing a threat of violence themselves, and building and maintaining positive school climate.

Throughout the T3 session, Facilitators should continuously bring the attendees back to key concepts that cross-cut how Threat Assessment and Management is understood, structured and applied:



The systematic, coherent process within which the discrete steps taken by Threat Assessment Teams is mapped; progressing from the identification of situations or students posing a threat of violence, through inquiry and the gathering of information, to fact-based assessment that draws on the information gathered and that then informs intervention and the holistic management of the threat.

That there is in almost all cases a knowable, discernible 'trajectory' that students posing a threat of violence follow: The Pathway to Violence; and that intervening as early as possible on this pathway – cognizant of the demands this places on identifying students

The Pathway to Violence



posing a threat of violence and situations of concern in the first place – is what Teams are seeking to achieve.

The STEP[®] Framework



[®] Deisinger and Randazzo (2008)

In a mass of information, a framework for how information is gathered, understood and used is of great importance in enabling coherent decision making. The STEP[®] framework underpins much of the Model K-12 Threat Assessment Procedures and Guidelines, guiding Teams to develop their understanding, analysis and, ultimately, management of threats based on the Subject of concern (referred to throughout this training as the student posing a threat of violence or, in context, simply as the 'individual' or 'student'), Target(s), the Environment the threat is emergent or manifest in, and any Precipitating Factors that may influence how and when a threat manifests.

T₃ Facilitators must be fully familiar with the entire scope of the training content and the key resources that underpin it, comprising:

- **The Threat Assessment and Management Integrated Process Flowchart and Case Management Form:** T₃ Facilitators should ensure attendees direct training participants to this early in the training and it is recommended training participants keep this reference available throughout the training, providing a diagrammatic representation of the Threat Assessment and Management process that will enable them to map what is being said by the trainer against its 'position' in the process, and also a model format for the documentation of threat assessment cases.
- **Videos:** The training uses 3 types of video:
 - **Scene Setting and General Information:** The "Evan" and "Say Something" videos employed at a very early stage in the training are designed to introduce some of the fundamentals of Threat Assessment and Management, easing the group into the subject.

- **Exposition:** Videos on "Factors Associated with Risk for Violence," the "Pathway to Violence," and the "Conduct of Threat Assessments" are short, animated videos used to summarize important information. They are designed to be used as a precursor (rather than conclusion) to their respective sections in the training, as a means of familiarizing the participants with key points, which are then examined in greater detail through instructor-led delivery and participative working. The scripts of these videos are contained in the respective points in the training content in Part B of this manual (blue, italicized text) as a reference.
- **Scenario-based Exercising:** These videos are developed based on realistic scenarios school-based Threat Assessment Teams may encounter and conclude with a series of questions used to prompt discussions. The videos iterate throughout the training, starting with four scenarios where only initial information is available. As the training progresses, some of the storylines of the videos continue, prompting further analysis, assessment and discussion around decision-making. The scripts of these videos are contained in the respective points in the training content in Part B of this manual (blue, italicized text) as a reference.

T₃ Facilitators should brief the T₃ attendees on where resources are found, and how to use them in the training to optimize learning outcomes and ensure the attendees leave the T₃ session comfortable with how to integrate these into the training.

The training content has been developed to employ good adult learning practices. T₃ attendees will all be experienced trainers in delivering professional development sessions to the K-12 Threat Assessment participant audience, and the role of the Facilitator is to focus on how the K-12 Threat Assessment training materials should be used, rather than on how to teach adults in general. That said, it is worth emphasizing to the attendees, in the context of the materials, that the following should be evident in how they deliver their sessions:

- **Relate the learning to the real world:** Adult learners respond best to learning which is set in the real-world context they will apply their new knowledge and skills in. Throughout their K-12 Threat Assessment trainings, they should seek every opportunity to contextualize the learning and the reason why it is important through real-world examples. Use case studies and realistic scenarios to illustrate the learning points. At all times, the learning needs to be lifted out of the "theoretical" to have greatest resonance with the audience. T₃ attendees should be encouraged (during the Explore phase of the T₃) to discuss case study examples that they might use to illustrate specific points; developing a bank of examples to deal with foreseeable questions from the audience – particularly on issues recognized as complex, contentious or prevalent in different contexts.
- In relating learning to the real world, Facilitators should be mindful of incorporating culturally responsive examples and case studies that avoid stereotypes and have a focus on building equity. It is easy for us all to build examples within our comfort zones and implicit biases, so we need to specifically focus on creating examples and case studies through an equity lens, ensuring disproportionate focus on race, ability, ethnicity, sexual orientation and gender identification, etc. are consciously avoided. Facilitators must reflect on the need to ensure equity as they build their stories and examples.

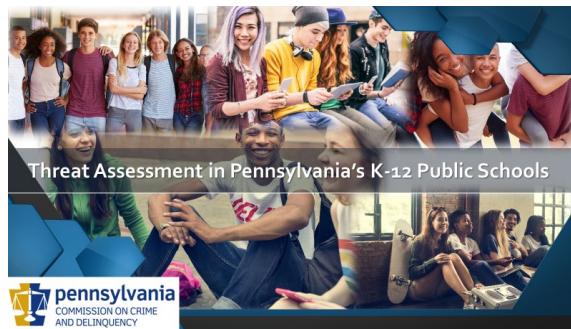
- **Avoid “lecturing”:** Adult learners do not respond well to lecturing, so T3 attendees should be reminded to not rely heavily on instructor-led presentation and avoid a tone of delivery that may be interpreted as patronizing.
- **Provide opportunities to contribute:** Those attending the K-12 Threat Assessment training will have experience and perspectives that can help in not only confirming their own understanding, but also in helping others learn. As often as possible, have the participants contribute their own experience and observations. This can also take some of the pressure off the trainers themselves. Adults, generally, will *expect* to be able to contribute, so trainers should provide as many opportunities as possible.
- **Provide opportunities to extend learning:** Threat Assessment and Management is a complex field and there will be areas of the subject that the training, due to time constraints or because of the specificity of the topic, deals with relatively briefly. The training materials contain a number of references (internet searchable terms, marked with the  icon) that can assist training participants in extending their own learning into specific topics – whether out of interest or because the subject has a particular relevance to the context individuals are working in and requires more detailed examination.
- **Maximize involvement:** As well as through providing opportunities to contribute, seek other ways to maximize involvement in the session. The materials employ a number of participative learning techniques such as discussion groups and problem-solving exercises to keep the participants active in the lesson. T3 Facilitators should also encourage attendees to think about other ways they might, as the “feel” of the session dictates, maximize involvement, such as asking training participants to engage in *ad hoc* role playing to illustrate a point. The materials also contain a number of scripted questions to examine key concepts. In addition, attendees should be encouraged to develop their own questions they might use that may be relevant to specific training participant groups.
- **Mix modalities:** The training materials have been developed to mix training modalities – switching between an instructional style where the trainer is delivering the information, through participative sessions, small group working and the use of videos as both exposition and in support of scenario-based exercising.
- **Use Guided Discovery:** Guided Discovery is a great tool. Attendees should be encouraged to ask questions of their training participant groups and Facilitators can assist the participants in identifying the correct answer without telling them what the answer is. When adults feel they have ‘solved a problem’ themselves, it creates a sense of investment in approaches and solutions to problems.
- **Expect challenge:** On a final note, attendees should expect questions and, in some instances, skepticism. T3 Facilitators should ensure attendees prepare for this by researching aspects of the broader Threat Assessment and Management domain that they may be less familiar with and rehearsing responses to likely lines of questioning.

PART B: PRESENTATION MATERIALS

TRAINING SCOPE, CONDUCT, GOALS AND THE LEGAL AND ADMINISTRATIVE CONTEXT

Instructor-led presentation with maximized participant engagement

SLIDES 1 to 2 – Introduction and Preliminaries



Preliminaries

Administration

- Alarms, exits and restrooms
- Timings
- Cellphones
- Lunch

Session expectations

- This is the time and space to be inquisitive – a safe environment
- Ask questions – challenge, explore, inquire
- Be positive, active engagement
- A good colleague – courteous in disagreement(!) and collaborative in co-working on answers
- Complete the Session Evaluation at the end of the day – and be candid!



Where this is a PCCD-coordinated session, PCCD will provide a welcome and introductory information on the PCCD Threat Assessment program and the work of the PCCD School Safety and Security Committee (SSSC), and then introduce the trainer. Where this training is being delivered by a facilitator who has been through the T3 program, this is the opportunity to introduce the school-based Team.

From this point onward, the session is led by the trainer. Open the session with a warm welcome to everyone participating and, where 3rd parties are present, be sure to introduce them (noting that, representatives from other state bodies may be present, such as from the PA Department of Education).

Deal with administrative matters:

- Alarms, exits and location of rest rooms.
- Timings for the day.
- Breaks and lunch.
- Protocols for cell phones – these should be switched to silent, but that you recognize that participants may need to check their cell phones to deal with urgent matters. Request that, if participants need to make a call, that they step out of the training room to do so.

Set out the session expectations:

- First: This is a "safe" environment, and participants should feel free to discuss issues that may be contentious and that no one's point of view is more or less valid, noting that it is through collective exploration of sometimes difficult issues that great learning will occur. People may, at times, feel uncomfortable, as some of the information may be confronting for various reasons. Explain that that is normal and to be expected as people explore content that is new and challenging. Normalizing this discomfort will help in building a more authentic and safe community of learning³. Something Facilitators should be particularly aware of in this regard, is that some of the videos, the general training content or someone's example or story causes can be an emotional trigger. No-one should feel discomfited in asking to step away from the session for a while or asking for some kind of support.
- That you are seeking their positive and active engagement in the learning. This session gives people the time and space to be inquisitive, so asking questions and challenging you as the trainer are encouraged.
- Be a good colleague to your fellow session participants – courteous in disagreement and collaborative in team-working to answer questions or work through problem sets.
- Finally, that PCCD is committed to ensuring this important training remains relevant and of a high standard. The evaluation sheets on the tables in front of each participant should be completed at the end of the day and feedback – both positive and constructive critique – would be genuinely appreciated and ensure the training evolves where it needs to, to meet the needs of our Threat Assessment Teams across the Commonwealth.

³ Facilitators might consider framing this in the Four Agreements of a Courageous Conversation: 1. stay engaged; 2. Speak your truth; 3. Experience discomfort; 4. Expect and accept non-disclosure. This approach draws on the concepts described by Singleton and Linton (Glenn E. Singleton & Curtis Linton, Courageous Conversations about Race: A Field Guide for Achieving Equity in Schools. 2006. pp.58-65. Thousand Oaks, CA: Corwin) and, while originally developed to facilitate conversations around race, stakeholders in PA have found positive utility in encouraging teams to reflect on these 4 agreements when thinking about any potentially difficult conversation.

Instructor-led presentation with maximized participant engagement

SLIDE 3 – Between You and Me...

Preliminaries

Between you and me...

- My background
- Your trainer and facilitator
- Creating collegial networks within PA for the collective benefit of Threat Assessment (TA) practice...
- ...introduce yourself during the breaks, and share contacts at the end of the session



Tell people about yourself:

- Briefly set out your background, education, training and experience and connection to Threat Assessment in the K-12 system.
- Emphasize that, as well as being their trainer, you are also there as a facilitator, guiding and mentoring where needed.
- Tell the participants that one 'soft' goal of the training is to help foster networks within and across school entities to the collective benefit of Threat Assessment practice in Pennsylvania.
- Note that participants can learn from each other's experiences, and that they can use each other as resources after the training is over. Encourage the participants to introduce themselves over the session breaks and to share contact information because it can be helpful to talk over ideas or strategies with others, even if confidential information cannot be disclosed.

Instructor-led presentation

SLIDE 4 – Why we are Here

Why we are here...

- Pennsylvania law requires Chief School Administrators to establish a Threat Assessment Team (TAT)
- For the assessment of and intervention with students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others
- You are at the front line of averting acts of targeted violence
- Research tells us that targeted violence is, in almost all cases, preventable

Keep a Record: Commit to a handful of practically achievable actions when you get back to work!

Extending your learning: Look out for the icon and the searchable internet references throughout the training



State that we are all here today for 2 reasons.

- On the one hand, it is a legal requirement. In June 2019, [Act 18 of 2019](#) amended the Public School Code of 1949 by adding [Article XIII-E, Threat Assessment](#). Among its provisions, Article XIII-E requires all school entities in Pennsylvania to establish at least one Threat Assessment Team by the beginning of the 2021-2022 school year. The teams are responsible for ***“the assessment of and intervention with students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others.”*** The Act defines team composition and responsibilities as well as reporting and referral requirements.
- On the other hand, we are all here because preventing school violence is a priority for all of us and the work that our Threat Assessment Teams do is extremely important. They – that is *you* – are at the front line of averting acts of targeted violence in our schools. On the face of it, this may seem a daunting responsibility... but what we know from the extensive body of research conducted since Columbine in 1999, is that targeted violence is, in almost all cases, preventable. What this training is designed to do is put you in a position to play your role in preventing acts of targeted violence.

Extending Your Learning

Alert the participants to the fact that, throughout the training they will be directed to resources where they can extend their learning into a field that interests them personally and/or professionally.



The following icon will display, along with a short, searchable internet reference; and a consolidated listing of these references is also to be found at the back of their participant handbooks.

Keep a Record of Your Thoughts and Observations...

Distribute the handout found at Appendix 4 to the participants.

Urge them to reflect on what is being said throughout the training and note down any strengths in their current [individual and Team] approach that can be enhanced, opportunities to improve their approach or access support from others that can be taken, but also to candidly note down any gaps or weaknesses in their approach revealed through the training and their interaction with others attending the session.

The participant Handout also has a field for Action Steps – actions they can personally take and that are within their ‘sphere of influence’ (i.e., represent something they could reasonably ‘get done’), and you should encourage the participants to complete this part of the Handout as the discussion plays out, drawing not only on their immediate colleagues’ inputs, but those from other Teams, school entities or others who are in the room.

Recommend that, rather than trying to be too ambitious(!), they should commit to trying to follow through on a handful of practically achievable actions once they return to places of work.

Instructor-led presentation with maximized participant engagement

SLIDE 5 – PCCD’s Model K-12 Threat Assessment Procedures and Guidelines

PCCD’s Model Procedures and Guidelines

- PCCD’s Model Procedures and Guidelines: based on PA law and established standards of practice
- Not prescriptive – school boards have authority to establish any policies or procedures that are consistent with applicable laws and regulations
- This training is directly aligned to the PCCD Models
- Wide range of resources; provide the legal and administrative context



[PCCD Model K-12 Threat Assessment Procedures and Guidelines](#)



Explain that the training session has been developed to align directly with the PCCD Model K-12 Threat Assessment Procedures and Guidelines. The PCCD model procedures are based on Pennsylvania law as well as a synthesis of established standards of practice. That said, this model is not prescriptive. **While school boards are required by law to establish procedures for the establishment of Threat Assessment Teams, they have the authority to establish any policies or procedures that are consistent with applicable laws and regulations.**



[PCCD Model K-12 Threat Assessment Procedures and Guidelines](#)

Direct participants to the extensive range of resources found at Appendix D of the PCCD Model K-12 Threat Assessment Procedures and Guidelines, that provide a repository of policy and practice resources developed by state and federal agencies, academia and other subject matter experts across the following themes:

- Threat Assessment.
- School Safety and Violence Prevention.
- Emergency Management and Response to School Violence.
- Confidentiality, Privacy and Consent.

Instructor-led presentation

SLIDE 6 – What are we Seeking to Accomplish?

What are we seeking to accomplish?

Training Goal

- To provide participants with an understanding of why violence prevention is possible and how behavioral threat assessment and management enables schools to identify, assess and intervene to avert potentially violent situations and manage students posing a risk for violence and situations of concern over time through the development of a holistic understanding of the factors pushing or pulling an individual along a pathway to violence

Intent: De-mystify the process, reduce anxiety, and increase skills and knowledge in the domain of Behavioral Threat Assessment and Management



Here you provide a clear statement of the goal of the session by presenting the Training Goal:

To provide participants with an understanding of why violence prevention is possible and how behavioral threat assessment and management enables schools to identify, assess and intervene to avert potentially violent situations and manage students posing a threat of violence and situations of concern over time through the development of a holistic understanding of the factors that move an individual along a pathway to violence.

And, if we were to summarize the overall intent, it would be to: De-mystify the process, reduce anxiety, and increase skills and knowledge in the domain of Behavioral Threat Assessment and Management.

The Learning Objectives listed below are those specific things that the individual will be able to do as a result of the session that, collectively, will achieve the overarching Training Goal. Trainers can introduce these as time allows:

- Understand Threat Assessment and Management in the context of other violence prevention efforts.
- Learn the requirements for school entities and TATs.
- Understand the composition of TATs, roles and responsibilities of Team members and the importance of relationships between both internal and external stakeholders.
- Gain skills in the identification, assessment and intervention with students who may pose a risk of harm to self or others.

- Understand the scope of Threat Management actions available to schools that balance supportive interventions with the need to protect the school community.
- Gain an understanding of the legal issues that often impact school TATs, and the importance of overall school climate for an effective school Threat Assessment and Management program.
- Apply learning through scenario-based exercises to practice concepts and principles taught.

SECTION 1 | INTRODUCTION AND RATIONALE FOR THE THREAT ASSESSMENT APPROACH

Videos and reflection/discussion period

SLIDES 7 to 8 – An Introduction to Threat Assessment



Encourage the participants to start reflecting on Threat Assessment and Management as a subject area, and their role in it, by watching two, very short videos (the videos are launched by clicking on the image adjacent to the following text (both of the videos were developed by *Sandy Hook Promise*):

- Video 1: [Evan](#)
- Video 2: [Say Something](#)

Advise the participants that, in the Evan video, it will show a scene where an individual points a gun at students and that, should any of the participants feel this may be upsetting they can step out of the room while the video is playing.

The videos begin to introduce some of the important concepts that the training will return to throughout the day. When the videos have finished, ask the participants what the important messages were (e.g., that peer knowledge is often there, but that the courage and awareness of mechanisms to report it must also be built; and that the signs that someone may pose a risk of violence are often in plain view – and therefore awareness of what those signs are is important throughout the school community) and, importantly, ask them if they have experience of situations that reinforce those key messages.

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SLIDE 9 – What is a Threat?

What do we mean by a 'Threat'?

- A concerning communication or behavior that suggests a person may intend to harm themselves or someone else
- May be expressed or communicated behaviorally, orally, visually, in writing, electronically, or through any other means
- A threat regardless of whether communicated directly to the target or to a third party
- A threat can be deduced *through an individual's behavior*



Pose the question to the participants, "In the context of your developing understanding of Behavioral Threat Assessment, what do we actually *mean* by a Threat?"

Draw on their responses to confirm that the technical definition of a threat is: *A concerning communication or behavior that suggests a person may intend to harm themselves or someone else.*

And explain that the threat may be expressed or communicated behaviorally, orally, visually, in writing, electronically, or through any other means; and is considered a threat regardless of whether it is communicated directly to the target of the threat or to a third party; and regardless of whether the target is even aware of the threat.

Note and re-emphasize the important dimension to this: that a threat *need not be directly expressed or communicated to a target*. It can be deduced through an individual's behavior or intentional and unintentional communication.

Instructor-led presentation with maximized participant engagement

SLIDE 10 – What is a Threat?

What do we mean by a 'Threat'?

- Could be:
 - Direct or indirect threats of violence...
 - ... statements – spoken or written...
 - ... gestures...
 - ... acts...
- ... that a reasonable person would interpret as threatening, unusual or bizarre behavior that would cause a reasonable person to fear injury or harm
- Communications or behaviors indicating suicidality
- Behavior which is atypical for the person or situation and causes concern for the safety or well-being of those involved
- ***Caution! Implicit bias – TA seeks to eliminate subjectivity and issues associated with implicit bias and equity***



[Kirwan Institute – Implicit Bias Online Modules](#)



[PDE Equitable Practices Hub](#)



Explain that such direct and indirect communications and behaviors may include:

- Direct or indirect threats of violence.
- Gestures.
- Acts...

...that a reasonable person would interpret as threatening, unusual or bizarre behavior that would cause a reasonable person to fear injury or harm or concern for the well-being of the student posing a threat of violence toward others ...

... Or are communications or behaviors indicative of someone who may be at risk for suicide or self-harm (we will explore these behaviors in more detail later in the session).

Student behavior that may indicate a threat to themselves or others, which we will look at in more detail later in the training, is that which is atypical for the student or situation and causes concern for the safety or well-being of those involved. This concerning behavior involves actions, statements, communications or responses that are unusual for the student or situation; or actions which could lead to violence toward self or others; or are reasonably perceived as threatening or causing concern for the well-being of the person.

Facilitators must be prepared to discuss the inherent subjectivity in determining whether a behavior or communication is concerning. Threat Assessment, as the training will explore in detail, is a fact-based process, that seeks to eliminate as much subjectivity as possible (and therefore implicit bias/issues around equity and profiling based on ethnicity and race, socio-economic background, disability, religion, political affiliation, sexual orientation and gender identification). That said, perception, bias and subjectivity will also enter human processes, and Threat Assessment teams must remain continuously watchful at all stages of the process, making determinations and decisions based on the factual information gathered through diligent inquiry, and with reference to the guidance this training provides. PDE's Equitable Practices Hub provides an excellent resource for Teams, alongside others such as the Kirwan Institute's.



[PDE Equitable Practices Hub](#)



[Kirwan Institute - Implicit Bias in Education](#)

Instructor-led presentation with maximized participant engagement

SLIDE 11 – Threats to Self and the Connection with Threat Assessment (Slide 1 of 7)

Threats to self and the connection with Threat Assessment

Under Act 18...

- *"Each school entity shall establish at least one team ... for the assessment of and intervention with students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others."*

And further in the Act...

- *"Be responsible [for] Assessing and responding to reports of students exhibiting self-harm or suicide risk factors or warning signs as provided for under section 1526 [of the PA School Code, 24 PS § 15-1526, brought into law under Act 71]."*

What is your interpretation of this language in the Act?



Where do you think the responsibilities of the TAT and Act 71/Crisis Response Teams start and end?



Facilitators should be prepared to address questions around an area that is very likely to raise some questions for training participants: the scope and nature of Threat Assessment Teams' responsibilities with regard to suicide prevention policies and protocols.

A note on the language used in the training: The training uses the term **Act 71 team** as shorthand for the individuals carrying out Act 71 policies and procedures, recognizing that there is considerable variation state-wide in the composition and naming of the 'teams' doing this.

As of the 2015-2016 school year, school entities in Pennsylvania were required to establish a suicide awareness and prevention policy that established methods of prevention, including procedures for early identification and referral of students at risk of suicide; methods of intervention for students identified as being at increased risk of suicide; and methods of responding to a suicide attempt or death, among other key components. While [Act 71](#) does not mandate that schools have a "team" **dedicated** to suicide prevention efforts, there may be an existing team, such as a Crisis Response Team or Student Assistance Program (SAP) team that helps to carry out Act 71 policies and procedures. So, for the purposes of this training, Act 71 team should be interpreted as that grouping in the school entity carrying out Act 71 policies and procedures.

Under Act 18, the following was set down:

*"Each school entity shall establish at least one team ... for the assessment of and intervention with students whose behavior may indicate a threat to the safety of **the student**, other students, school employees, school facilities, the community or others."*

And, further in the Act:

"Be responsible [for] Assessing and responding to reports of students exhibiting self-harm or suicide risk factors or warning signs as provided for under section 1526 [of the PA School Code, 24 PS § 15-1526, brought into law under Act 71⁴]."

Pose the question: What is your interpretation of this language in the Act? Where do you think the responsibilities of the Threat Assessment Team and Act 71 / Crisis Response Teams start and end?

- Participants talk at their tables for approximately 5 minutes.
- Ask for a group to share their own response to the question and use this to elicit a discussion that then addresses the clarifications set out on the next slide.

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SLIDE 12 – Threats to Self and the Connection with Threat Assessment (Slide 2 of 7)

Threats to self and the connection with Threat Assessment

- **Not** the intention of the Act to:
 - Create **duplication of effort** with a school entity's existing suicide awareness and prevention policies and procedures; **or**
 - Create a requirement that **all students** presenting with risk of suicide **must** be overseen by TATs; **or**
 - Create a requirement that **all students** presenting with risk of suicide **must** be routed through the threat assessment process set down in this training
- Because a single pathway would likely:
 - Be inefficient
 - Perpetuate misunderstandings about suicide risk among youth that may increase the stigma around help-seeking, which is counter to broader school-based suicide prevention efforts



On a surface reading, the language of the Act could be interpreted as:

- Creating a duplication of effort with a school entity's existing suicide awareness and prevention policies and procedures under section 1526; **or**
- As a requirement that all students presenting with risk of suicide must be overseen by Threat Assessment Teams; **or**
- As a requirement that all students presenting with risk of suicide must be routed through the threat assessment process laid out in this document.

None of these are true and are not the intention of the Act.

As the training will look at later, individuals expressing suicidal thoughts or behavior are rarely a risk to others, but converse is not true and, in many lethal attacks completed or averted, the student in question was either known, or subsequently found to have been having, suicidal thoughts or behaviors indicative of

⁴ Youth Suicide Awareness and Prevention and Child Exploitation Awareness Education; Act of Jun. 26, 2014, amending the Public School Code of 1949.

risk for suicide.⁵ Therefore, a single pathway may not only increase inefficiency, but also may perpetuate misunderstandings about suicide risk among youth that may increase the stigma around help-seeking, which is counter to broader school-based suicide prevention efforts.

⁵ National Threat Assessment Center. (2019). *Protecting America's Schools: A U.S. Secret Service Analysis of Targeted School Violence*. U.S. Secret Service, Department of Homeland Security. NTAC's analysis of acts of intended violence in K-12 settings found 41% of the students carrying out the violent acts were motivated by suicide to carry out their attacks. For 7%, this appeared to be their primary motive. An additional 34% had suicidality as a secondary motive. These findings reveal that suicidal ideations were rarely the sole or primary factor in an attacker's motivation for violence, but that suicidal thoughts and behaviors were frequently present, nonetheless. Suicidal ideations were more typically found in combination with, and secondary to, other motives. 60% of students carrying out acts of intended violence experienced suicidal thoughts, and 54% had communicated about, or engaged in behaviors related to, suicide or self-harm. In some cases, multiple friends knew that the individual was suicidal. In other cases, evidence of self-harm was noted by friends, parents, and/or school staff.

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SLIDES 13-14 – Threats to Self and the Connection with Threat Assessment (Slides 3 and 4 of 7)

Threats to self and the connection with Threat Assessment

- TATs and Act 71 / Crisis Response Teams need to coordinate efforts
- Consider how and when students may need to be referred **to** and **from** TATs, and/or the potential points of overlap or intersection
- Develop policies and procedures that operationalize this coordination
- TATs' work [and this training] has a significant focus on acts of targeted violence toward others
- This is **not to minimize suicide risk**
- PAYS 2023: In the preceding 12 months, of students in grades 8, 10, and 12:
 - 16.5%, 16.4% and 17.9% respectively had reported considering suicide
 - 5.3%, 5.4% and 5.9% respectively had attempted suicide
 - 16.5%, 15.1% and 13% respectively had self-harmed



Threats to self and the connection with Threat Assessment

But it recognizes the following:

- Established, mature pathways exist to assess and intervene with those posing a threat to self... and, if procedures to assess and intervene in suicide risk **do not currently exist**, **these should be put in place**, but this is not for the TAT to action
- Most individuals posing a threat to self **do not pose a threat to others**
- The **converse is not true...** NTAC Protecting America's Schools analysis of targeted violence in K-12 settings found:
 - 41% of the students carrying out the violent acts were motivated by suicide
 - For 7%, this appeared to be their primary motive
 - An additional 34% had suicidality as a secondary motive
 - 54% had communicated about, or engaged in behaviors related to, suicide or self-harm



Given that school entities in Pennsylvania have existing pathways to assess and respond to students that may be at risk of harm to themselves as per Act 71, schools will need to carefully consider how and when these students may need to be referred to Threat Assessment Teams, and/or the potential points of overlap or intersection between Threat Assessment Teams and existing suicide prevention procedures.

If procedures to assess and intervene in suicide risk do not currently exist, Facilitators should note to the participants that they should be put in place.

Facilitators should focus on establishing clarity in how those at risk for harm to themselves are handled in the Threat Assessment process to support Threat Assessment Team members, staff involved in suicide prevention protocols, and the broader school community around the challenging intersection that these two large policy and practice domains create.

There are a few points that will help Teams in this regard:

- Suicide and self-harm in school age populations is a large and complex policy and practice domain in its own right, and it is not the place of this Threat Assessment training to provide guidance and instruction on this subject area, ***other than where it specifically connects with Threat Assessment***. Participants seeking to extend their professional understanding of suicide prevention should be guided to the comprehensive range of subject-specific resources that are out there, including those through the Pennsylvania Department of Education's Office for Safe Schools and Prevent Suicide PA. Both [PDE](#) and [Prevent Suicide PA](#) have developed an Act 71 page with links to various resources for comprehensive school-based suicide prevention, including policy, awareness efforts and campaigns, training and education, screening and assessment, interventions (e.g., safety planning), reentry, and postvention.
- A significant proportion of the training's focus is on acts of intentional violence toward others. This is not to minimize the significance of risk among school-aged youth of harm to self – noting that suicide is the second leading cause of death for 10-24 year old's⁶ and that self-harm and suicidal thoughts and behaviors are prevalent among youth⁷, but, rather, recognizes that there are established pathways ***that already exist in schools for the early identification, referral, and intervention with students that may be at risk of harming themselves, as mandated under Act 71***.
- Suicide risk screening and/or assessment is a skill that requires training, and established methods for follow-up should be outlined in a school entity's policies and protocols. This process may be undertaken by school entity personnel who are suitably qualified to do so (e.g., school counselor, school psychologist), or it may be undertaken by a contracted external provider (e.g., community-based mental health service provider). This process does not have to be overseen by the Threat Assessment Team although, as we will discuss later, there may be important points of intersection, such as when school mental health professionals are members of TAT teams and also responsible for conducting the suicide risk screening or assessment.
- It is essential for Threat Assessment Teams and school personnel or school teams (e.g., crisis response, SAP) responsible for overseeing or having involvement in the school entity's Act 71 policy and procedures to collaborate as soon as possible to determine the protocols they will follow for the assessment and intervention with students at risk for suicide, and to ensure their efforts are aligned, rather than duplicative and potentially conflicting.

⁶ National Center for Injury Prevention and Control. 10 leading causes of death by age group, United States - 2022. Retrieved March 31st, 2025, from www.cdc.gov. Representing 21% of all deaths for children aged 10-14, and 17% for those aged 15-24.

⁷ The Pennsylvania Youth Survey 2023 found that, within the preceding 12 months, of students in grades 8, 10, and 12, respectively 16.5%, 16.4% and 17.9% had reported considered suicide; 5.3%. 5.4% and 5.9% had attempted suicide; and 16.5%, 15.1% and 13% had self-harmed.

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SLIDES 15-16 – Threats to Self and the Connection with Threat Assessment (Slides 5 and 6 of 7)

Threats to self and the connection with Threat Assessment

What does this mean in practical terms:

- TATs are unlikely to see the majority of students presenting initially with suicidal thoughts or behaviors
- This is because these students are rarely a threat to others, and so will be assessed and supported through the established suicide prevention pathways and referred into the TA process only where there are warning signs that may indicate a possible risk to others
- For this reason, TATs could **never** be deemed responsible for the assessment of, and intervention with, **all** students at risk for suicide
- Given the increased risk of suicide among students that pose a risk of violence to others, **any student referred to the TAT should be screened for risk for suicide**



Threats to self and the connection with Threat Assessment

- Members of TATs such as school counselors and school psychologists could act as a **pivot**, as they will frequently also be responsible for suicide risk screening or assessment within a school entity, providing a natural point of synergy
- Or this pivot role could be performed by other TAT members who are members of Act 71 / Crisis Response Teams (e.g., School Safety and Security Coordinator)
- TATs should establish protocols for information sharing and follow-up regarding the outcome of a suicide risk screening or assessment for a student who, because they also present a threat to others, will remain involved in the TA process:
 - Will avoid risks that parallel efforts are counterproductive / duplicative
 - Consideration will need to be given to confidentiality and relevance to case management



So, what does that mean? While local school board policies and procedures will shape the final applied practice adopted by Threat Assessment Teams, the following considerations regarding alignment of Threat Assessment Teams and school-based suicide prevention protocols may support school entities in establishing their pathways:

- As noted above, **Threat Assessment Teams are unlikely to see the majority of students presenting initially with suicidal thoughts or behaviors**, including where referred from Safe2Say Something via OAG's Crisis Center. This is because these students are rarely a threat to others, and so will be assessed and supported through the established suicide prevention policies and procedures and referred into the Threat Assessment process only when there is an observed warning sign that may indicate a possible risk to others or when this risk is identified through the suicide risk screening or assessment process. For this reason, Teams could **never** be deemed responsible for the assessment of, and intervention with, **all** students at risk for suicide.

- For students that are initially referred to Threat Assessment Teams following a threat of harm to others, Teams should observe for suicide warning signs throughout the process, including during the Intake and Initial Inquiry stage. If suicide warning signs are observed at any point in the threat assessment process, regardless of whether the student also presents risk for violence against others, this should activate a school entity's Act 71 policy and protocol, and the student should be referred to the appropriate school staff member(s) for next steps (e.g., suicide risk screening or assessment).
- As a standing protocol given the increased risk of suicide among students that pose a risk of violence toward others, any student referred to the Threat Assessment Team should be screened (at a minimum) for risk for suicide, even in the absence of observable suicide warning signs.
- Given the points above, Teams must establish their own protocols for dealing with instances where students present with suicide warning signs during the threat assessment process, as well as for a universal suicide screen of referred students even in the absence of specific suicide warning signs.
 - Members of Threat Assessment Teams such as school counselors and school psychologists could act as a *pivot*, as they will frequently also be responsible for suicide risk screening or assessment within a school entity, providing a natural point of synergy.
 - If this is not be the case, Threat Assessment Teams should consider other team members that may be involved in both threat assessment and suicide prevention efforts and/or establish pathways for communication when there are no team members involved in both efforts.⁸
 - Teams should establish protocols for information sharing and follow-up regarding the outcome of a suicide risk screening or assessment for a student involved in the threat assessment process, with full consideration of confidentiality and the relevance to case management within the Threat Assessment Team.

⁸ For instance, 51% of school entity respondents to the January 2024 statewide K-12 Threat Assessment End of School Year Survey indicated that, in addition to their primary role (Administrators or dedicated Safety and Security Coordinators), they were *Crisis Response Team members/Suicide Prevention (Act 71) team members*. The online survey disseminated by PCCD generated 746 responses from individual school entities across the State.

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SLIDE 17 – Threats to Self and the Connection with Threat Assessment (Slide 7 of 7)

Threats to self and the connection with Threat Assessment

- TATs must be aware of both warning signs and risk factors for suicide
- State suicide risk prevention efforts have strongly encouraged schools to focus primarily on warning signs (not risk factors) to activate their suicide prevention protocols
- Risk factors alone should not activate those protocols as schools would find themselves then needing to screen nearly every student (given prevalence of risk factors)
- PDE's Model Administrative Regulations: *"Early identification of individuals exhibiting suicide warning signs is vital to the school entity's suicide prevention efforts"*
- *"[However] In the absence of an immediate warning sign for suicide, students demonstrating suicide risk factors that appear to be adversely impacting the student should be referred through an appropriate mechanism (e.g., Student Assistance Program) for follow-up"*



[Prevent Suicide PA Online Learning Center](#)
[Youth Suicide Education Awareness and Prevention Model Curriculum](#)
[Suicide in Schools - A Practitioner's Guide to Multi-level Prevention, Assessment, Intervention, & Postvention](#)

We have talked about warning signs indicative of risk for suicide and, alongside these, Threat Assessment Teams should also consider factors that may escalate the level of risk for suicide.

Commonly understood warning signs and risk factors are set out here (based on those listed by Prevent PA on their [Warning Signs & Risk Factors](#) pages, with augmentation from content of PDE Model Administrative Regulations) but, as with warning signs and risk factors associated with threats of intended violence against others, these should not be viewed as either exhaustive or prescriptive, and no single warning sign or risk factor would conclusively tell us that an individual is at risk for suicide. It is often the interpretation of several warning signs in combination with risk factors that will get us closer to an understanding of the individual's suicide risk.

As time allows, encourage participants to share their own understanding of what might be warning signs and risk factors for suicide, leading the group to the recognition that the breadth of scope of warning signs and risk factors is wide, and not individually conclusive of risk for suicide.

Warning Signs	Risk Factors
Talking about suicide, wanting to die, kill oneself	Diagnosis of Depression
Talking about feeling worthless, hopeless, or having no reason to live	Previous suicide attempt
Looking for a way to kill oneself, such as searching online or buying a gun	Family history of suicide
Talking about being a burden to others	Death or terminal illness of a loved one
Suddenly happier and calmer, especially after a period of depression or sadness	Loss of major, significant relationship
Giving away prized possessions	Loss of health, either real or imagined

Warning Signs	Risk Factors
Getting affairs in order, making arrangements	Someone close to the person has completed suicide
Increasing alcohol or drug use	Recent disappointment or rejection
Preoccupation with death	Disciplinary or legal problems, including school disciplinary issues / juvenile probation / adjudications
Acting anxiously or agitated; behaving recklessly.	Sudden loss of freedom/fear of punishment
Sleeping too little or too much; sleep disturbances	Bullying (victim, perpetrator, both, and/or witness)
Withdrawal from or changing in social connections/situations	Questioning gender / sexual orientation – and compounded by lack of family and/or peer support for gender identity/sexual orientation
Recent impulsiveness and taking unnecessary risks	Sudden loss of family home (e.g., through repossession) or other major disruption
Showing rage or talking about seeking revenge	Disordered/chaotic homelife ('latchkey kid', infrequent and <i>ad hoc</i> contact with caregivers)
Displaying extreme mood swings	Domestic violence, including sexual abuse against individual at risk for suicide or close family members; child neglect
Anger or hostility that seems out of character or out of context	Bipolar or other mood disorder
Recent increased agitation or irritability	Externalizing disorders, such as ADHD and Conduct Disorder

Because of the wide range of risk factors for suicide (almost anyone would have at least one risk factor), state suicide risk prevention efforts have strongly encouraged schools to ***focus primarily on warning signs (not risk factors) to activate their suicide prevention protocols.*** Risk factors alone should not activate those protocols as schools would find themselves then needing to screen nearly every student (given prevalence of risk factors).

That said, the following excerpted from PDE's model administrative regulations is also important to consider, to ensure that, even where an individual is not showing warning signs for suicide risk, they do not slip through the net if there are other [risk] factors that indicate the need for support: ***Early identification of individuals exhibiting suicide warning signs is vital to the school entity's suicide prevention efforts. In the absence of an immediate warning sign for suicide, students demonstrating suicide risk factors that appear to be adversely impacting the student should be referred through an appropriate mechanism (e.g., Student Assistance Program) for follow-up.***

Later in the training, we will also look at protective factors – those positive situational or personal factors that can be of significant help in deterring someone from engaging in negative or harmful behaviors.

[Prevent Suicide PA Online Learning Center](#)

[Youth Suicide Education Awareness and Prevention Model Curriculum](#)



[Suicide in Schools - A Practitioner's Guide to Multi-level Prevention, Assessment, Intervention, and Postvention](#)

Instructor-led presentation

SLIDE 18 – Threat Assessment – An Integrated and Systematic Approach

Threat Assessment: An integrated and systematic approach

- Developed to ensure TATs can conduct TA in a way that is coherent and consistent
- Encouraging bystander reporting is an **essential precursor step** to the main 4 steps
- Integrated: Requiring a multi-agency approach / coordinated action between internal and external stakeholders
- Systematic: Process-driven approach that works logically through 4 steps:



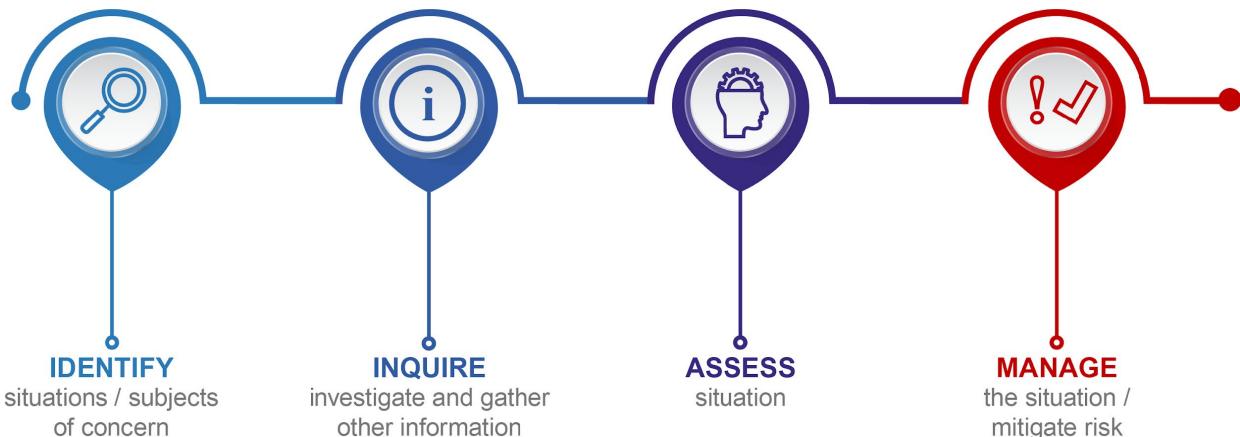
- The Manage step is defined to reinforce the fact that an assessment of the threat is not a final product, but the beginning of a management process



Explain to the participants that, to ensure coherence and consistency in the way Teams conduct Threat Assessments, a logical and linear approach has been developed. To ensure a full consideration of factors, it is important that this approach is followed systematically.

The Threat Assessment process and subsequent Threat Management is significantly more powerful when it does not happen in isolation. Planned, process-driven integration and coordination with local agencies and service systems (rather than *ad hoc* connections) within the school and the community (e.g., community-based service providers, law enforcement) are the hallmarks of an effective, efficient, holistic approach.

Threat Assessment works through the following four main steps – and an important precursor step necessary to enable the other four – which we will look at in more detail later in the session. Threat Assessment is a fact-based and systematic process designed to:



- **Encourage:** Encouraging bystander reporting is an essential precursor step and covers actions and channels to positively enable and support the sharing of concerns about issues impacting student safety and well-being, from potential threats of school violence to other issues like bullying, self-harm, suicidal ideations, drug use, etc., through the Safe2Say Something program.
- **Identify:** Identifying situations and/or students that have raised some concern, for example because a student made a threat or is behaving in a way that is worrying their friends. At the identification step, we set a low threshold for triggering the next steps in the Threat Assessment and Management process. One of the principles we will look at later is that intervening early on the pathway to violence is the goal.
- **Inquire:** Gathering Information from multiple sources that are lawfully and ethically available to enable an understanding of the case/situation to build as full a picture as time allows. In doing this, we should ask, "What else, if anything, may we already know about this situation?" Note that we are not solely (or even primarily) investigating to prove a crime or policy violation, but rather, trying to understand the situation and how best to address it, and doing so in a way that implicit biases are consciously reflected upon, recognized and eliminated. It is important to remember that threat assessment and management is not the same as a criminal or disciplinary investigative process, or the same as investigating a Title IX complaint, or bullying incident – things which many Threat Assessment Team members, by virtue of the Team's mandated composition, will have been trained on.
- **Assess:** Evaluating the totality of the information gathered to determine whether the student/situation poses a threat of violence or harm to others, to self, or both others and self. Importantly, we do this as a team to develop a working consensus and limit the potential for bias, as well as ensure we are capturing the perspectives of a multi-disciplinary team. Note that the assessment of suicide risk is not something that will, explicitly, be conducted by the Threat Assessment Team. While the Team may identify warning signs or risk factors indicative of suicide risk but, the formal assessment itself will entail a referral to the Act 71 team.
- **Manage:** The Manage step is explicitly defined to reinforce the fact that ***an assessment of the threat is not a final product, but the beginning of a management process***, entailing developing and implementing a plan; often involving supporting external stakeholders and resources found at

different levels within the school division – to manage the situation and reduce risk where a student/situation is believed to pose a threat.

Instructor-led presentation

SLIDES 19 to 20 – The Rationale for the Threat Assessment and Management Approach



Where does the rationale for our approach come from?

- Based on several decades of research that intensified immediately after Columbine
- Seminal research published 2004 (U.S. Secret Service and DOE; Safe School Initiative (SSI))



Explain that the rationale for schools adopting a Behavioral Threat Assessment approach is based on several decades of research. This research has generated a set of principles that we should continuously refer to and reflect on when conducting a Threat Assessment.

The seminal research into school-based targeted violence was conducted by the U.S. Secret Service and Department of Education through the Safe School Initiative (SSI). They examined 37 incidents that occurred in the United States between December of 1974 and May of 2000. This study identified the fundamental assumptions and principles that underlie the behavioral threat assessment approach and offered strategies for identifying and interrupting the path of individuals who may be moving towards a targeted attack.

It is important to note that, although the final report was released in 2004, the extensive body of subsequent research, by the Service's National Threat Assessment Center (NTAC), as well as federal law enforcement agencies, academics and others continue to corroborate and validate these findings. For instance, NTAC's 2019 report, *Protecting America's Schools* (PAS), compared findings in the initial report with the analysis of a

further 41 incidents of targeted violence in schools across America between 2008 and 2017, and found the original conclusions remarkably durable and consistent.

Threat Assessment Team members are advised that, to ensure they are referencing the most up to date research, PAS (and other recent research) will provide the more contemporary understanding of the behaviors of persons who engage in mass violence.

It is also worth recognizing that both SSI and PAS looked only at mass school shootings by current or recently former students, which is neither the full range of mass shootings, nor reflective of the broader range of targeted violence that happens on a daily basis in schools.

Direct the participants to the extensive range of resources available to Threat Assessment Teams, including the national clearing house for resources on creating safer schools that contains resources on *Threat Assessment and Reporting* (www.schoolsafety.gov) and specific, salient reports:



[*SchoolSafety.gov*](http://SchoolSafety.gov)



[*USSS Safe Schools Initiative Report*](http://USSS.org)



[*USSS Protecting America's Schools – Analysis of Targeted School Violence*](http://USSS.org)



[*FBI Making Prevention a Reality*](http://FBI.gov)



[*USSS & DOE A Guide to Managing Threatening Situations*](http://USSS.org)



[*Defining an Approach to Assessing Risk for Targeted Violence*](http://USSS.org)

Instructor-led presentation

SLIDE 21 – The Rationale for the Threat Assessment and Management Approach

Where does the rationale for our approach come from?

- Research suggests that establishing or enhancing threat assessment capabilities as part of a comprehensive strategy can reduce the likelihood of violence and help address the mental and behavioral health needs of students.
 - The 2018 PA School Safety Task Force Report also recommended implementing multidisciplinary threat assessment teams as a best practice.



Building on the strategic basis for behavioral threat assessment and management, conclude by explaining that establishing and operating multidisciplinary Threat Assessment Teams – as recommended in the 2018 Pennsylvania School Safety Task Force Report – is now recognized as best practice.

Q&A-driven discussion

SLIDE 22 – Fact or Fiction (Slide 1 of 4)

Fact or Fiction?

- School attacks are often sudden, impulsive acts
 - **Fiction:** They are *rarely impulsive*; attackers typically don't "just snap" ... *they decide*
- People often have no idea of the attacker's ideas or plans
 - **Fiction:** In most cases, *other people knew about the attack* before it took place
- Most attackers threatened their target directly prior to the attack
 - **Fiction:** Majority of attackers *did not make direct threats to their target(s)* beforehand
- Most attackers were "under the radar" showing no indicators they were in need of help
 - **Fiction:** Nearly all *engaged in behaviors, prior to their attacks, that caused concern or alarm* to at least one person



Ask who has read the Findings of the original Safe Schools Initiative published by the [National Threat Assessment Center \(NTAC\)](#) or NTAC's subsequent [Protecting America's Schools](#) report released in 2019. Few will have done this! But, reassure them that even though they haven't read it, they might be surprised

at what they *do* know. Also advise the participants that they should obtain a copy of Protecting America's Schools if they do not have one and be familiar with the core findings.

Working through the next block of slides, present each bullet individually and ask participants for a thumbs up if it is a fact or thumbs down if it is fiction. After each 'vote', explore the implications for Threat Assessment Teams, seeking to re-emphasize throughout how we are seeing that the pathway to violence really is discernible and, if we are orientated to how and where to look, it will sharpen the ability of Threat Assessment Teams to get to the Identification and Assessment steps that much quicker.

Each of the discussed 'facts' or 'fictions' illustrate one of the principles that should guide how Threat Assessment and Management is approached:

School attacks are often sudden, impulsive acts.

- One of the first facts about these attacks is that **they are rarely impulsive**; these attackers typically don't "just snap" ... they decide. The attackers think about and plan their attacks in advance – sometimes a few days in advance, sometimes months or more in advance. The attacks examined in both SSI and PAS appeared to be the end result of a comprehensible process of thinking and behavior: behavior that typically began with an idea, progressed to the development of a plan, moved on to securing the means to carry out the plan and culminated in an attack. This is a process that potentially may be knowable or discernible from the attacker's behaviors and communications.

People often have no idea of the attacker's ideas or plans.

- In most cases, **other people knew about the attack before it took place**. This finding suggests that students and staff can be an important part of prevention efforts, something that the National Police Foundation's [Averted School Violence database](#) continues to corroborate through ongoing analysis of acts of averted violence (i.e., cases that, ultimately, did not lead to violence occurring) in schools countrywide. In 2018, following analysis of 51 acts of averted violence, the National Police Foundation concluded that it was peers in the school in nearly 60% of instances who identified and reported the concerning behavior first. This, in many cases, relates to something called 'Leakage', that the training will look at in due course.



[Averted School
Violence](#)

Most attackers threatened their target directly prior to the attack.

- The majority of the attackers examined under the Safe School Initiative **did not make direct threats to their target(s) beforehand**. This finding underscores the importance of not waiting for a threat before beginning an inquiry; other alarming or troubling student behavior can prompt a school threat assessment team to gather more information and make an assessment, even if the student posing a threat of violence of concern does not threaten a target directly.

Most attackers were "under the radar" showing no indicators that they were in need of help.

- Nearly all of these students **engaged in behaviors, prior to their attacks, that caused concern or alarm to at least one person**, usually an adult, and most concerned or alarmed at least three people. The behaviors that led other individuals to be concerned about the attacker included both

behaviors specifically related to the attack, such as efforts to get a gun, as well as other concerning behaviors not related to the subsequent attack, such as writing poems and essays for homework assignments that debated whether suicide or homicide would offer a better solution to the student's problems. This finding highlights the range of behaviors in an individual's life that may be noticeable and that could prompt some additional probing by a school threat assessment team, albeit conscious of the fact that students who pose a risk for violence should not be 'profiled' on this basis. It is also worth noting, as identified in the NTAC *Protecting America's Schools* report, that other factors were also discernible that were either known or manifest, including the fact that many had prior contact with law enforcement in addition to frequently having a history of suspension, expulsion and other disciplinary issues, and over 90% had experienced psychological, behavioral or developmental symptoms and 40% had a documented mental health diagnosis (compared with a population base rate of around 20%).

- Three main categories of observable mental health symptoms were displayed prior to attacks:
 - Psychological (e.g., depressive symptoms: 63%; suicidal ideation: 60%; anxiety: 29%; psychosis: 20%).
 - Behavioral (e.g., defiance/misconduct: 40%; ADHD/ADD: 29%; aggression: 23%; anger: 14%; animal cruelty: 9%).
 - Neurological/developmental: 20% (e.g., developmental delays, cognitive deficits, learning disabilities).
- 54% had received one or more mental health services prior to their attack.
- History of substance use (49%) or abuse (20%).

SLIDE 23 – Fact or Fiction (Slide 2 of 4)

Fact or Fiction?

- Most school attackers are suicidal or at a point of desperation prior to their attack
 - **Fact:** Most attackers appeared to have difficulty coping with losses, personal failures or other difficult circumstances and, in many cases, **desperation and suicidal ideation was certainly manifest**. Most attackers **exhibited a history of suicide attempts or suicidal thoughts at some point prior to their attack**
- Potential school attackers can be identified by certain physical characteristics, personality traits and school history
 - **Fiction:** There are **no set of traits that described all – or even most – attackers**. The demographic, personality, school history, and social characteristics varied substantially

 Meloy, J.R., Hoffmann, J., Deisinger, E.R.D. & Hart, S.D. (2020) 'Threat Assessment and Threat Management', in Meloy & Hoffmann (Eds.) International Handbook of Threat Assessment, 2nd Edition. New York: Oxford.

 Evaluating the Risk for Targeted Violence in Schools

Most school attackers are suicidal or at a point of desperation prior to their attack.

- Most attackers appeared to have difficulty coping with losses, personal failures or other difficult circumstances and, in many cases, **desperation and suicidal ideation was certainly manifest**. Almost all of the attackers had experienced or perceived some major loss prior to the attack. These

losses included a perceived failure or loss of status; loss of a loved one or of a significant relationship, including a romantic relationship; and a major illness experienced by the attacker or someone significant to them. Although most attackers had not received a formal mental health evaluation or diagnosis, most attackers exhibited a history of suicide attempts or suicidal thoughts at some point prior to their attack (78%). When we talk about case management, there are a lot of things we can do to help someone who is having difficulty coping with losses or failures – or who is desperate or even suicidal.

Potential school attackers can be identified by certain physical characteristics, personality traits and school history.

- Although all of the attackers in the SSI study were boys⁹, **there are no set of traits that described all – or even most – attackers.** The demographic, personality, school history, and social characteristics of the attackers varied substantially. Knowing that an individual shares characteristics, behaviors, features or traits with prior school shooters does not help in determining whether that student posing a threat of violence is thinking about or planning for a violent act. The use of profiles in this way likewise is not an effective approach to identifying students who may pose a risk for targeted school violence at school or for assessing the risk that a particular student may pose for a school-based attack, once a particular student has been identified. Reliance on profiles to predict future school attacks carries two substantial risks:
 1. The great majority of students who fit any given profile of a "school shooter" will not actually pose a risk of targeted violence.
 2. Using profiles will fail to identify some students who in fact pose a risk of violence but share few if any characteristics with prior attackers. Rather than trying to determine the "type" of individual who may engage in targeted school violence, an inquiry should focus instead on an individual's behaviors and communications to determine if they appear to be planning or preparing for an attack. Rather than asking whether a particular individual "looks like" those who have launched school-based attacks before, it is more productive to ask whether they are engaging in behaviors that suggest preparations for an attack, if so, how fast they are moving toward attack, and where intervention may be possible.



[Threat Assessment and Threat Management](#)¹⁰



[Evaluating the Risk for Targeted Violence in Schools](#)

⁹ Note that female students form a significant number of averted and several completed acts of targeted violence described in the Averted Schools Violence dataset and used as case study examples in the July 2018 NTAC Operational Guide for Preventing Targeted School Violence.

¹⁰ Meloy, J.R., Hoffmann, J., Deisinger, E.R.D. & Hart, S.D. (2020). 'Threat Assessment and Threat Management', in Meloy & Hoffmann (Eds.) *International Handbook of Threat Assessment, 2nd Edition*. New York: Oxford.

SLIDE 24 – Fact or Fiction (Slide 3 of 4)

Fact or Fiction?

- Many attackers felt bullied, persecuted or injured by others prior to the attack
 - **Fact:** Almost *three-quarters of the attackers felt persecuted, bullied, threatened, attacked or injured by others* prior to the incident
- Most attackers had access to weapons and experience using them
 - **Fact:** *Experience using weapons and access to them was common for many attackers.* Nearly two-thirds of the attackers had a known history of weapons use



Many attackers felt bullied, persecuted or injured by others prior to the attack.

- **Almost three-quarters of the attackers felt persecuted, bullied, threatened, attacked or injured by others prior to the incident.** Bullying was not a factor in every case, and clearly not every child who is bullied in school will pose a risk for targeted violence in school. Nevertheless, in a number of the incidents of targeted school violence studied, attackers described being bullied in terms that suggested that these experiences approached torment. These attackers told of behaviors that, if they occurred in the workplace, likely would meet legal definitions of harassment and/or assault. Educators can play an important role in ensuring that students are not bullied in schools and that schools not only do not permit bullying but also empower other students to let adults in the school know if students are being bullied or harassed.

Most attackers had access to weapons and experience using them.

- **Experience using weapons and access to them was common for many attackers.** Nearly two-thirds of the attackers had a known history of weapons use, including knives, guns and bombs. Access to weapons among some students may be common. However, when the idea of an attack exists, any effort to *acquire, prepare or use a weapon or ammunition* may be a significant move in the attacker's progression from Ideation to Implementation. Any inquiry should include investigation of and attention to weapon access and use and communications about weapons. Attention should also be given to indications of any efforts by an individual to build a bomb or acquire bomb-making components. The large proportion of attackers who acquired their guns from home points to the need for schools and law enforcement officials to collaborate on policies and procedures for responding when an individual is thought to have a firearm in school.

SLIDE 25 – Fact or Fiction (Slide 4 of 4)

Fact or Fiction?

- Attackers act alone and without the involvement of others
 - **Fiction:** Most carried out their attacks on their own, **but many were influenced or encouraged by others to engage in the attacks.** Nearly 50% were influenced by others in deciding to mount an attack, dared or encouraged to attack, or both
- Most incidents are stopped by law enforcement
 - **Fiction:** Most attacks **were stopped by school administrators, educators and students** or by **the attacker stopping on their own**



Attackers act alone and without the involvement of others.

- Although most attackers carried out their attacks on their own, **many attackers were influenced or encouraged by others to engage in the attacks.** Nearly half of the attackers were influenced by other individuals in deciding to mount an attack, dared or encouraged by others to attack, or both. Any investigation of potential targeted school violence should include attention to the role that the friends or peers of a student posing a threat of violence may be playing in that individual's thinking about and preparations for an attack. It is possible that feedback from friends or others may help to move them from an unformed thought about attacking to developing and advancing a plan to carry out the attack.

Most incidents are stopped by law enforcement.

- Even though law enforcement responded very quickly to these shootings once notified, **most school-based attacks were stopped through intervention by school administrators, educators and students - or by the attacker stopping on their own.** This appears in large part to be a function of how brief most of these incidents were in duration. The short duration of most incidents of targeted school violence argues for the importance of developing preventive measures in addition to any emergency planning for a school or school district.

Facilitated discussion

SLIDE 26 – What Does this Tell Us? And an Introduction to the Path to Violence

What does this tell us?



- Many acts of targeted violence are preventable... The challenge?
- Pieces of the puzzle are usually there; but information is often scattered and fragmented
- If we act quickly when we first learn about something concerning then we can figure out who might have some relevant information
- To do this, we need to **set a low bar to trigger the TA process**
- In evaluating information, ask: **Is the subject of concern on the pathway to violence?**



Facilitate an open discussion around what the Fact or Fiction exercise tells the participants.

Reinforce the big take-home message from all of this is... **that many acts of targeted violence¹¹ are preventable – if we can uncover someone's ideas and plans for violence in advance.**

The challenge is that while there are usually pieces of the puzzle available, the information is likely to be scattered and fragmented.

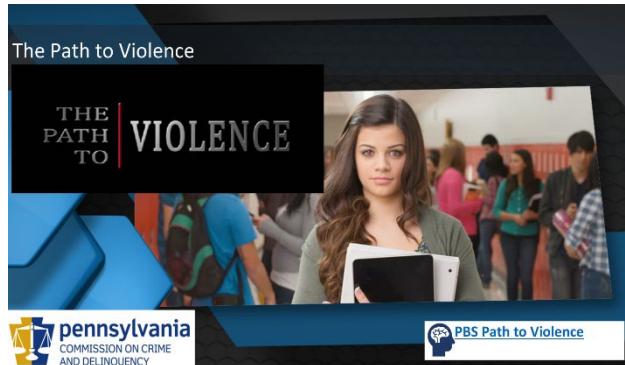
If we can act quickly when we first learn about someone who has raised concern – and that is helped by setting a low bar to triggering the Threat Assessment process – then we can figure out who might have some relevant information – a piece of the puzzle – and start assembling the facts.

When we evaluate the information gathered, we essentially ask whether the student posing a threat of violence is on the pathway to violence, and so poses a threat to self or others: do they have an idea to do harm, a plan, are they taking steps toward carrying out the plan, have they acquired a weapon, are they close to launching an attack, etc.?

¹¹ While the majority of case studies related to acts of targeted violence in schools featured in SSI and PAS relate to shootings, the findings have been found to be equally applicable to other acts of proactive, targeted violence. As the Facilitator, it is important to stress throughout that Threat Assessment is not designed to 'stop the next school shooter' – it is agnostic of the mode of intended violence.

Videos and reflection/discussion period

SLIDES 27 to 28 – Introduction to the Path to Violence



Consolidate this grounding in Threat Assessment through watching the first 18 minutes or so of the PBS video, "The Path to Violence."¹² Let the participants know that this is part of a near hour-long video and is actually part of a linked series of in-depth explorations dealing with violence in American schools that followed the Sandy Hook Elementary School shooting of 2012 in Newtown, Connecticut. Discuss any issues raised by the video in an open forum once the video concludes.



[PBS The Path to Violence](#)

Reflect on this from the National Threat Assessment Center

When establishing threat assessment capabilities within K-12 schools, keep in mind that there is no profile [of an attacker]. There have been male and female attackers, high-achieving students with good grades as well as poor performers. These acts of violence were committed by students who were loners and socially isolated, and those who were well-liked and popular.

Rather than focusing solely on a student's personality traits or school performance, we can learn much more about a student's risk for violence by working through the threat assessment process, which is designed to gather the most relevant information about the student's communications and behaviors, the negative or stressful events the student has experienced, and the resources the student possesses to overcome those setbacks and challenges.

U.S. Secret Service National Threat Assessment Center, July 2018



[Operational Guide for Preventing Targeted School Violence](#)



Summarize this section by allowing the participants to reflect on the following:

¹² Navigate to the Video titled PBS After Newtown | The Path to Violence in the Additional in-Module Online Video Resources section of the webpage.

When establishing threat assessment capabilities within K-12 schools, keep in mind that there is no profile (of an attacker).

There have been male and female attackers, high-achieving students with good grades as well as poor performers. These acts of violence were committed by students who were loners and socially isolated, and those who were well-liked and popular.

Rather than focusing solely on a student's personality traits or school performance, we can learn much more about a student's risk for violence by working through the threat assessment process, which is designed to gather the most relevant information about the student's communications and behaviors, the negative or stressful events the student has experienced, and the resources the student possesses to overcome those setbacks and challenges.

Enhancing School Safety; Using a Threat Assessment Model | An Operational Guide for Preventing Targeted School Violence

US Secret Service National Threat Assessment Center, July 2018



[Operational Guide for Preventing Targeted School Violence](#)

Note that the US Secret Service Operational Guide to Preventing Targeted School Violence (2018) picks up from the earlier Safe Schools Initiative report and provides a particularly useful summary of real-world examples that illustrate key findings around identifiers that someone may be on the pathway to violence. These examples can help greatly in contextualizing the threat for other audiences the Threat Assessment Team may be working with to cascade awareness of the topic.

While an excellent resource, Threat Assessment Team members should read it understanding the following:

- It is written from a premise where school administrators are operating in relative isolation and are taking on the heavy lift of establishing and operating Threat Assessment Teams with limited external support. That is not the case in Pennsylvania, where PCCD's Model K-12 Threat Assessment Procedures and Guidelines, broad scope of training and other professional development and availability of consultative/technical assistance resources¹³, means administrators do have access to support, advice, and guidance.

¹³ Including state agencies such as PDE/[Office for Safe Schools](#), as well as the Threat Assessment Technical Assistance Network (funded via PCCD through a federal grant from the U.S. Department of Justice, Bureau of Justice Assistance STOP School Violence Technology & Threat Assessment Program) and closely linked technical assistance providers including the Pennsylvania Training and Technical Assistance Network ([PaTTAN](#)).

SECTION 2 | THE PRINCIPLES OF THREAT ASSESSMENT

Instructor-led presentation

SLIDE 29 – The Principles of Threat Assessment



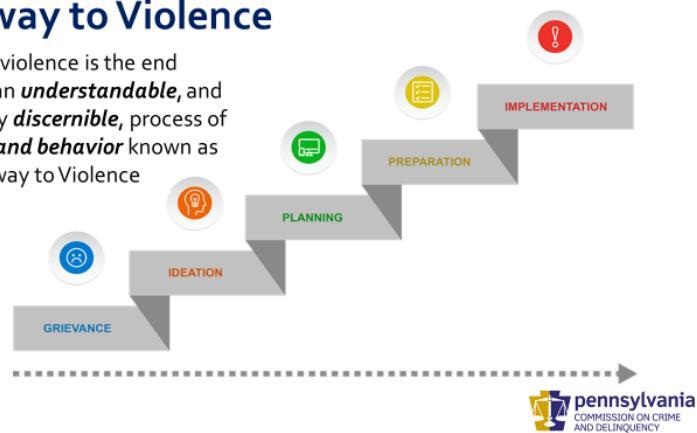
Introduce this next section of the training by explaining that you will now explore the principles translated from the body of research and established good practice, developing the themes discussed in the Fact or Fiction session and the video and reflection period you have just worked through.

Video and instructor-led discussion

SLIDE 30 – The Principles of Threat Assessment | Pathway to Violence

The principles of Threat Assessment | Pathway to Violence

- Targeted violence is the end result of an *understandable*, and frequently *discernible*, process of *thinking and behavior* known as the Pathway to Violence



Explain that the first principle the training will examine – that targeted violence is the end result of an understandable, and usually discernible, process of thinking and behavior known as the Pathway to Violence – is introduced through a video launched by clicking on the image in the center of the slide.

In the video, a graphical representation of the pathway is shown displaying the progression of a targeted attack from ideas about the use of violence to address a grievance, either real or perceived, to engaging in research and the development of a plan moving on to preparations (acquisition of the means/capacity to carry out the plan) to the violent act itself. This graphic reflects the understanding that individuals who carry

out targeted attacks don't "just snap." Instead, they engage in a process of thought and escalation of action over days, weeks, months even years. However, as you will also see, the path is not a one-way street, and, just as someone can move toward carrying out an attack, they can retreat, and step off the path entirely.

The text of the video is shown here, and trainers are advised to watch the video fully to ensure they are able to field questions from the participants as to any specific aspects:

In almost all cases, an individual carrying out an act of targeted violence had moved along a discernible pathway; moving from some kind of grievance that triggers thoughts of violence – what we call 'ideation', through Research and Planning, to Preparation and, ultimately, Implementation of the targeted violent act.

While individuals can move slowly or rapidly along this pathway, and externalities may accelerate or decelerate their progress along it, in most cases this pathway is very definitely there. The challenge for Threat Assessment Teams and the wider school community is spotting people early enough on this pathway to enable timely intervention. Let's look at the steps in turn:

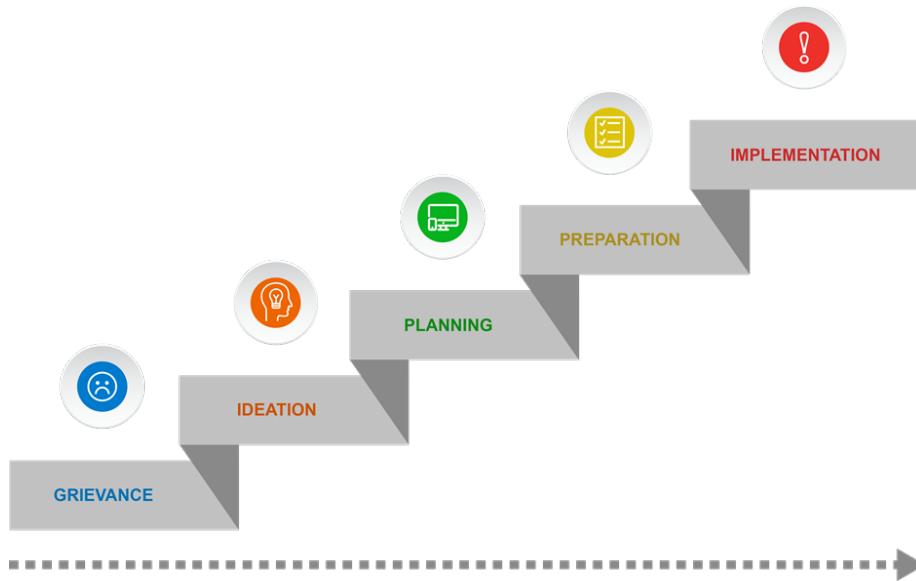
- **Grievance:** A grievance is generally defined as the cause of someone's distress, or reason for complaint or resentment. Most people will experience grievances through life and the vast majority do not engage in acts of violence. However, for those who do engage in targeted violence, grievances are common precursors. In the threat assessment context, a grievance takes on additional meaning to include a highly personal meaning for the individual of concern, often fueling a feeling of being wronged and translating into behaviors related to destiny, loss, despair, a sense of mission – including achieving notoriety, or the desire for revenge. Grievances are often understood as being one or a combination of the following:
 - Personal.
 - Political.
 - Religious.
 - Racial/Ethnic.
 - Environmental.
 - Special Interest.
- **Ideation:** The Ideation step occurs where an individual is thinking about or expressing the use of violence to address the grievance. Of course, most of us have grievances from time to time, but few of us seriously consider violence in addressing those grievances. When people begin to consider violence as the preferred – or only – way to address grievances, that is a significant concern.
- **Planning:** This step involves the person considering what would be needed to act on the ideas about violence, and frequently involves online searches, researching and gathering information on prior acts of violence in schools such as school shootings, and, in some cases, highly elaborate surveillance and reconnaissance of target areas, the production of maps, schedules and analysis of weak points in security measures.
- **Preparation:** This is the operationalization of the plan. It involves developing or acquiring the skills and means to carry out the plan – such as getting hold of a weapon and practicing. Often this may include

preparations around the refinement of the method, creating or acquiring the opportunity to attack, and gaining access to targets.

- **Implementation:** *The final step is the act of targeted violence itself. It is at this point that the individual initiates the operationalized plan. This occurs once they reach a point where they perceive themselves as capable of doing so. Capability is based on the individual's perceived skill to cause harm, and the will to do so. As an individual moves along the Pathway to the right, and more of the steps are present, capability and risk for violence increases along the vertical dimension. The horizontal line at the bottom of the Pathway model represents time. As the individual moves to the right along the pathway, there is often an escalation in the rate of movement – a flurry of activity or energy burst – or changes in the frequency of behaviors causing concern, or a sudden change in their patterns of behavior.*

The steps along this path indicate opportunities to observe, identify and intervene with behaviors or communications that cause concern for violence. Frequently, information about an individual's ideas, plans and preparations for violence can be observed before violence can occur. However, information is likely to be scattered and fragmented. For example, a teacher may see a certain set of behaviors of an individual in their class, a coach observes other behaviors or expressed thoughts by the individual, a School Resource Officer has other concerns, and a school administrator is aware of certain conduct violations. The challenge, and the key, is to act quickly upon initial reports of concern, gather other pieces of the puzzle and assemble them to determine what picture emerges.

When we conduct a threat assessment, essentially, we are trying to figure out if the student in question is on this pathway to violence – and if so, how far along are they and how can we get them off the pathway. We will be returning to this graphic throughout our discussions today.



When the video finishes, emphasize that the framework for understanding how individuals move toward an act of targeted violence provided by the Pathway to Violence is fundamental to our approach to Behavioral Threat Assessment and will form a continuing reference point throughout the training. Then pick back up on the review of the principles of Threat Assessment.

Video and instructor-led discussion

SLIDE 31 – The Principles of Threat Assessment | STEP[®]

The principles of Threat Assessment | STEP[®]

- Targeted violence stems from an interaction among the subject(s), the target(s), the environment and the precipitating events



©Deisinger & Randazzo (2008)



The second principle we will examine – that targeted violence stems from an interaction among the subject(s) – the individual(s) posing a threat of violence, the target(s), the environment and the precipitating events – is also introduced through a video launched by clicking on the image in the center of the slide.

In the video, a graphical representation of the STEP[®] factors is shown displaying, reinforcing the idea that these factors form part of a puzzle, and it is through joining the pieces together that the puzzle can be solved.

The text of the video is shown here, and trainers are advised to watch the video fully to ensure they are able to field questions from the participants as to any specific aspects:

One of the key principles of threat assessment is the understanding that risk for violence is an interaction between the individual who poses a risk for violence, referred to in this model as the subject, and the target, the environment, and the precipitating events that are present.

With this in mind, we will explore how an understanding of these four components are critical to understanding the level of concern presented by an individual in a given situation and, equally as important, to engaging in effective risk mitigation and intervention activities. These factors are remembered as the acronym STEP[®]:



© Deisinger & Randazzo (2008)

- **Subject:** the goal of threat assessment and management is to gain a holistic understanding of the subject of concern – the individual who might pose a threat of violence. Of particular interest are the individual's self-perception, coping skills, mental health, response to rules and authority, exposure to or engagement in violence, access to and experience with weapons, and motivation towards using violence as a means to solve problems. This may be revealed by gathering information from school educational and discipline records, witnesses, social media posts, the individual themselves, and observations made by teachers, counselors, administrators, School Resource Officers or other Law Enforcement Officers and others who know the individual.
- **Target:** The target may be an individual, a group of individuals or a location. In some cases, the relationship between a grievance and the target may be identified; however, in other cases it may be difficult or impossible to identify the relationship. Nonetheless, it is important to consider the potential target and the factors that may increase or decrease their vulnerability for harm.
- **Environment (or setting):** A focus on the environment gives consideration to the context in which the individual is operating both in school and in the community. Environmental factors include school climate and culture, social relationships -to include peer influences- and family dynamics. An understanding of the environments in which the individual exists, both in and out of school, is critical to determine the level of concern an individual poses and to identify potential strategies to manage the individual and mitigate risk.
- **Precipitating Events (or situation):** An understanding of the stressors affecting the individual of concern is an important step in assessing and managing the case. Stressors may be acute or chronic and can be anything in their life that causes them tension or worry. In general, the more stressors in a person's life, the more difficult it will be for them to cope. For this reason, an understanding of the individual's response to stressors is as important as identifying the stressors themselves. The threat assessment team must operate with the understanding that, in the face of multiple precipitating events, an individual's stress level may be such that they are vulnerable to a "last straw" or triggering event, an event which causes them to advance on the path to violence.

When the video finishes, emphasize that these four factors will appear throughout the training, and understanding risk for violence as the interplay of these dynamic factors is a really useful tool. Then pick back up on the review of the principles of Threat Assessment.

Instructor-led presentation with maximized participant engagement

SLIDE 32 – The Principles of Threat Assessment (Slide 1 of 2)

The principles of Threat Assessment

- Threat assessment is about **prevention, not prediction**
- Focus must be on the **central question**: Whether an individual **poses** a threat, not just whether the person has **made a threat**
- An **inquisitive, objective and diligent mindset is critical** to successful TA
- Effective TA is based upon **observations of behavior, rather than on characteristics –Behavioral Threat Assessment – a deductive process**
- Very different to profiling – an inductive process asserting certain traits are predictive of the probability an individual will engage in a certain form of behavior
- **Violence is a dynamic process**. No one is either always dangerous or never dangerous



Having introduced two of the underpinning principles in the earlier sections ((1). That targeted violence is the end result of an understandable, and frequently discernible, process of thinking and behavior and, (2). That targeted violence stems from an interaction among subjects – the individuals who might pose a threat of violence to themselves or others, the targets, the environment and the precipitating events), present and discuss the remainder of the principles in turn:

- Threat assessment is about **prevention, not prediction**. The Team is not trying to predict whether an individual of concern is a 'violent person'. Instead, the Team is trying to prevent violence from occurring through determining under what circumstances they might become violent or engage in other harmful or significantly disruptive behaviors, what the impact of the situation is upon others – even when an individual poses no identifiable threat, what environmental or systemic factors may be contributing to the situation, and whether there are any precipitating events on the foreseeable horizon.
- Focus must be on the **central question**: Whether an individual or situation **poses a threat** (i.e., is moving along the pathway to violence), not just whether the person has **made a threat** (directly expressed intent to harm). As discussed earlier, research on targeted violence in schools and workplaces has found that **fewer than 20 percent of violent perpetrators communicated a direct or conditional threat to their target** before the violence. In the majority of incidents of targeted violence, perpetrators did not directly threaten their targets, but they did communicate their intent and/or plans to others before the violence. This indirect expression or third-party communication of intent to cause harm is often referred to as "leakage". The absence of a direct threat should not, by itself, cause a team to conclude that someone does not pose a threat or danger to others.
- An **inquisitive, objective and diligent mindset is critical** to successful threat assessment and management. Those who carry out threat assessment must strive to be accurate, fair, thorough and diligent, continuing throughout the assessment process both to gather pieces of information and to

fit the pieces into a larger picture and to gain understanding of the context and situation. Fact-checking and corroboration of information are hallmarks of a good investigation or inquiry.

- Effective threat assessment is ***based upon observations of behavior, rather than on general characteristics***, "traits" or profiles. And this is the reason why the Threat Assessment approach is ***based on an assessment of behaviors not the socio-economic background, gender, ethnicity, race, age, religion, personality attributes or any other characteristic***. As discussed earlier, there is no profile that describes the individuals who have carried out acts of completed or averted targeted violence in U.S. schools.
- ***Violence is a dynamic process***. No one is either always dangerous or never dangerous. The dynamics of the case can and will change as the team engages in interventions, as individuals of concern, targets and others interact, and as other life circumstances impact on the case and the level of danger and concern posed. As a consequence, Threat assessment and management involves ongoing review, re-assessment, and modification of intervention strategies through to the point at which the case is adequately resolved.

SLIDE 33 – The Principles of Threat Assessment (Slide 2 of 2)

The principles of Threat Assessment

- An ***integrated systems approach*** should guide threat assessment investigations
- Relationships with agencies and service systems within the school and community are critical to identifying, assessing, and managing individuals on a path to violence
- ***Social media and on-line activity are often critical considerations***
- ***The relationship between mental illness and violence is complex***. Serious mental illness increases general risk of violence, but is not the major factor that it is perceived to be ***and is almost never the sole or primary explanation for a violent act***
- Proactivity to ensure ***individuals who may pose a threat are identified and intercepted early*** is necessary; achieved by setting a low bar to triggering TA



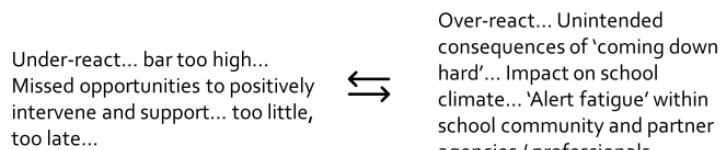
- A collaborative and coordinated approach between systems within the school and the community are critical for an effective threat assessment and management processes. An "***integrated systems approach*** ***should guide threat assessment investigations***". Relationships with agencies and service systems within the school (e.g., school psychologist, school social worker, Student Assistance Program (SAP) team members, special education/IEP teams, Safe2Say Crisis Teams, school-based mental health clinicians, administrators, disciplinary officers, etc.,) and community (e.g., mental health, juvenile justice, child welfare, law enforcement) are critical to identifying, assessing, and managing individuals who are on a path to carrying out an act of targeted violence. Explain to the participants that this principle, that ***Threat Assessment is an integrated effort***, is one that will be returned to throughout the training repeatedly, such is its importance and centrality to the effective work of Threat Assessment teams.

- In many cases ***social media and online activity are critical considerations***. Students posing a threat of violence, and those concerned about those individuals, often use social media to express such concerns. For those who may pose a threat, their expressions of grievances, violent intent, planning and preparation, can often be observed in online activities, and this applies equally to those posing a threat to self who are likely to disclose suicidal thoughts and risk factors online and on social media.
- ***The relationship between mental illness and violence is complex***. Most persons living with mental illness will not be violent toward others. Most people who are violent are not mentally ill. The presence of serious mental illness increases general risk of violence, but it is still not the major factor that it is perceived to be and is almost never the sole or primary explanation for a violent act. Other risk factors such as having a history of violence, childhood exposure to violence, or substance use disorder or dependence, have more significant correlations with violence overall. For threat assessors dealing with a student posing a threat of violence, the ***symptoms and behaviors associated with an individual's mental illness – as opposed to the diagnosis*** – can be significant factors affecting a case.
- ***Proactivity to ensure individuals who may pose a threat are identified and intercepted early is necessary***, and this is achieved by setting a ***low bar to triggering Threat Assessment***. Where concerning behavior or communication is observed, these may result in 'sub-threshold' actions (i.e., those that do not require the Threat Assessment Team to fully mobilize, but nevertheless result in some form of intervention that diminishes future risk – early, positive intervention (PBIS, SAP referral, direct referrals to school/other counseling services, mental health services, social workers etc.)) is an 'implied' function of Threat Assessment Teams and the Threat Assessment process, and that can only happen where individuals who are early on the journey along the pathway to violence are identified.

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SLIDE 34 – The Principles of Threat Assessment

The principles of Threat Assessment



TA is a mechanism that is logical, can be trusted and seeks to remove subjectivity



Conclude by recognizing that the role is challenging in requiring a balance between a *laissez faire* approach and a 'knee-jerk' reaction which could be an over-reaction, instinctive resort to 'disciplinary' action as opposed to a more nuanced intervention that has better long-term outcomes, etc. This is, of course, the

purpose of a defined Threat Assessment process: to create a mechanism that is logical, can be trusted and seeks to remove elements of subjectivity.

SECTION 3 | RESPONSIBILITIES AND COMPOSITION OF THREAT ASSESSMENT TEAMS

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SLIDES 35 to 36 – Responsibilities of Threat Assessment Teams



Code-mandated responsibilities of Threat Assessment Teams

- Assessing and intervening with individuals who may pose a threat to self or others
- Ensuring **school employees** know:
 - **Who** the Team members are
 - **How** – and to whom – to report threatening or at-risk behavior, including through *Safe2SaySomething*
- Reporting quantitative data to the Chief School Administrator / designee on the Team's activity
- Additionally recommended to provide advice, guidance, awareness raising materials and training **to the whole school community** on recognizing threatening or aberrant behavior, and how to report it



Summarize what has been indirectly covered in the training so far by now discussing the mandated responsibilities of Threat Assessment Teams.

Explain briefly the responsibilities of the Chief School Administrator (or their designee) for each school entity. The Chief School Administrator, in working with the School Safety and Security Coordinator, of the school entity is responsible for:

- Establishing at least one multidisciplinary Threat Assessment Team in each school entity.
- Appointing the members of the team and designating a member to serve as Team leader.
- Establishing Threat Assessment procedures.

- Facilitating opportunities for members of the Team to complete group or individual training consistent with nationally recognized best practices during paid working hours or as in-service training.
- Ensuring that students, school employees and parents and guardians (collectively, referred to as caregivers throughout these training materials, other than where specifically quoting policy or law references, in which cases, the original form of words is retained) are informed of the existence and purpose of the team, with information posted on the school entity's publicly accessible Internet website.
- Annually develop and present to the school entity's board of directors at an executive session a report generally outlining the school entity's approach to Threat Assessment, and quantitative measures associated with cases managed by the Team.

The Teams themselves are, of course, operationally responsible for assessing and intervening with individuals who may pose a threat to others and, where this is the case *and* the individual also presents warning signs or risk factors suggestive of a threat to self, for ensuring they are referred to the Act 71 pathway. They are also responsible for ensuring school employees are aware of:

- **Who** the staff members are appointed to the Threat Assessment Team(s).
- **How** to report threatening or at-risk behavior, including through the Safe2Say Something Program.

In addition, and to support the Chief School Administrator (or designee) in carrying out their reporting obligations to the school entity's board of directors, Threat Assessment Teams will be required to collate and report quantitative data on their work through the school year.

Statute also requires that age-appropriate informational materials are made available to students and school employees, as well as posting information for students, school employees and caregivers regarding the existence and purpose of the Threat Assessment Team on the school entity's publicly accessible website. While not required under statute, it is recommended that students, teachers, staff, School Security Personnel¹⁴, other school personnel, and caregivers be provided training and guidance on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and how they should report that information. This may fall to the Threat Assessment Team or be developed and delivered in consultation with the Team by a specifically mandated workgroup.

¹⁴ Comprising: School Police Officer, School Resource Officer or School Security Guard, and defined under Article XIII-C School Security (Art. hdg. amended July 2, 2019, P.L.406, No.67):

- **School Police Officer:** Any of the following: (1) A law enforcement officer employed by a school entity or nonpublic school whose responsibilities, including work hours, are established by the school entity or nonpublic school; (2) An independent contractor or an individual provided through a third-party vendor who has been appointed under section 1302-C.
- **School Resource Officer:** A law enforcement officer commissioned and employed by a law enforcement agency whose duty station is located in a school entity or nonpublic school and whose stationing is established by an agreement between the law enforcement agency and the school entity or nonpublic school. The term includes an active certified sheriff or deputy sheriff whose stationing in the school entity or nonpublic school is established by a written agreement between the county, the sheriff's office and the school entity or nonpublic school.
- **School Security Guard:** An individual employed by a school entity, nonpublic school or a third-party vendor or an independent contractor who is assigned to a school for routine safety and security duties and has not been granted powers under section 1306-C(a)(3) or (b). (Def. amended Nov. 27, 2019, P.L.662, No.91).

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SLIDE 37 – Responsibility to Notify after Preliminary Determination

Code-mandated responsibilities of Threat Assessment Teams

In addition, Teams are to:

- Upon a **preliminary determination** that a student may pose a threat of violence or physical harm to self or others, **notify** the chief school administrator or a designee, the student's building principal and the school safety and security coordinator
- The building principal or designee will immediately attempt to notify the student's caregiver*, **unless abuse or neglect are suspected, in which case CPS would be notified, and not the student's caregiver**
- *This general reporting requirement does not stop school employees from acting immediately to address an imminent threat



Explain that, in addition, the Team is to notify the chief school administrator or designee, the student's building principal and the school safety and security coordinator, upon a preliminary determination that a student may pose a threat of violence or physical harm to self or others. The building principal or designee will immediately attempt to notify the student's caregiver. In reality, it is usually a member of the Threat Assessment Team, as designee for the principal, who is also going to notify the student's caregiver(s).

One clear exception to this requirement to notify caregiver(s) is where the student's caregiver(s) are suspected of abuse or neglect, in which case Child Protective Services would be notified, and not the student's caregiver(s).

Note that this reporting requirement does not stop school employees from acting immediately to address an imminent threat, entailing the activation of protocols contained within the school entity's Emergency Operations Plan.¹⁵

¹⁵ School entities may call this Plan by different names, including the Emergency Preparedness Plan or the All-Hazards Plan. For the purposes of this training, the term Emergency Operations Plan is used and taken to mean the analogous plans in place with a school entity, however they are named.

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SLIDE 38 – Composition of Threat Assessment Teams

Code-mandated responsibilities of Threat Assessment Teams

Act 55 of 2022 amended Article XIIIE (Threat Assessment) to specify new training, education, and awareness requirements:

- All school entities **must annually** facilitate opportunities for members of threat assessment team to complete group or individualized training
- School entities, over and above the recommendation to provide advice, guidance, awareness raising materials and training to the whole school community on recognizing threatening or aberrant behavior, and how to report it, **must also annually** ensure that students, school employees, and parents/guardians are **informed of the existence and purpose of the school entity's threat assessment team(s)**
- School entities must provide training to school employees (online or in person) on a range of safety and security related subjects, which can include threat assessment



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- All school entities **must annually** facilitate opportunities for members of threat assessment team to complete group or individualized training
- School entities, over and above the recommendation to provide advice, guidance, awareness raising materials and training to the whole school community on recognizing threatening or aberrant behavior, and how to report it, **must also annually** ensure that students, school employees, and parents/guardians are **informed of the existence and purpose of the school entity's threat assessment team(s)**
- School entities must provide training to school employees (online or in person) on a range of safety and security related subjects, which can include threat assessment

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SLIDE 39 – Composition of Threat Assessment Teams

Composition of Threat Assessment Teams

- As a minimum, each Team is to include individuals with expertise in:
 - School health
 - Counseling, school psychology or social work
 - Special education
 - School administration
 - + School Safety Coordinator
- This composition of TAT members should not be understood as the final composition... A core team of 3-5 members, augmented by others...



*Who in your school might fulfill these roles?
Can members fulfill more than one role?*



Who else could be beneficially included either as a sitting member of a TAT or as someone called in on an ad hoc basis where specialized expertise would be of value?

As a minimum, each Team is to include individuals with expertise in:

- School health.
- Counseling, school psychology or social work.
- Special education.
- School administration.
- School Safety and Security Coordinator – the School Safety and Security Coordinator must be appointed to the Threat Assessment Team.

The threat assessment process is multidisciplinary and collaborative by design and should not be implemented in isolation. Teams should include multiple members within the decision-making process regarding cases presented to them for consideration and should also be well versed in the threat assessment process. Threat Assessment Teams should also consult with their school solicitor, as well as other school entities, local law enforcement, and other partners if they are unsure how to proceed with a particular case and should document any consultation with outside resources.

In some instances, individuals may have expertise in more than one field and may wear “two hats”. For example, school administrators have expertise in special education and may, therefore, serve the team in both capacities. Ensure the following is emphasized with participants: While having individuals on the Team covering more than one area of expertise meets the letter of the law, in reducing the Team’s ability to develop alternative viewpoints or access deeper levels of expertise and experience, it arguably does not meet the spirit of the law and is likely to make for a less effective Team.

Note that, to optimize skills, expertise and experience that already exist, as well as analogous processes already in place, Article XIII-E allows school entities to satisfy requirements by assigning threat assessment responsibilities to an existing team, including SAP or Safe2Say Something Crisis Teams.

Explain that, however, this should not be understood as the final composition of a Threat Assessment Team. To ensure teams are best able to achieve their goals – and including an unbroken connection to the holistic *management* of cases taken through the Threat Assessment process – teams can include other members. These could be 'full' members or *ad hoc*, called into the Team where specific cases would benefit from specialized knowledge or perspective.

Ask the participants, "Who in your school might fulfill these roles? Can members fulfill more than one role?"

Ask the participants, "Who else could be beneficially included either as a sitting member of a TAT or as someone called in on an ad hoc basis where specialized expertise would be of value?" Elicit examples such as:

- School security personnel.
- Law enforcement agencies.
- Behavioral health professionals.
- Individuals receiving reports from the *Safe2Say Something Program*.
- SAP team members.
- Juvenile Probation professionals.
- Home and school visitors.

Ultimately, Threat Assessment Teams will typically comprise 3 – 5 individuals as 'core' members and be augmented by other specialist expertise as driven by the needs of the case, and the student and situation of concern.

Note that, most K-12 Threat Assessment experts surveyed by the National Center for School Safety indicated that law enforcement and counselors are essential team members (84% and 82% respectively) – Pennsylvania legislation specifies only that TAT members include individuals with *expertise in* counseling, school psychology *or* social work¹⁶.

¹⁶ *School Threat Assessment Toolkit – Section 1: How to Select and Train Your School Threat Assessment Team*, National Center for School Safety, 2024.

SECTION 4 | CONDUCTING THREAT ASSESSMENTS – THE PROCESS IN OVERVIEW

Video and facilitated discussion

SLIDES 40 to 41 – Conducting Threat Assessments – The Process in Overview



Introduce this section saying that what the participants will now see is a short video that will set out the model process (directly aligned to the Model PCCD K-12 Threat Assessment Procedures and Guidelines) for the conduct of Threat Assessments. Explain that this section of the training is intended to be introductory, and the steps in the process – Identify, Inquire, Assess and Manage – will be dealt with in more detail later.

On their desks, all participants will have a single page handout (found at Appendix 1) summarizing in schematic form the process for conducting Threat Assessments.

Recommend that, as the video plays, participants should track the process using the process flowchart handout and annotate this with observations as to differences or questions arising associated with the process as used in their own context.

The text of the video is shown here, and trainers are advised to watch the video fully to ensure they can field questions from the participants as to any specific aspects:

The process for conducting Threat Assessments is one that is logical and systematic. Here we depict the process as a flowchart.

While the process steps may be called by different names in your local context, the overall approach is likely to be very similar. The process depicted here is directly aligned with the Pennsylvania Commission on Crime and Delinquency's Model K-12 Threat Assessment Procedures and Guidelines. Threat Assessment Teams are encouraged to develop their own processes that fit the local context and school board policy and procedural requirements, and the process depicted here can be used as a starting point for Teams.

It is important for Threat Assessment Teams to note that, throughout the Threat Assessment and Management process, at every point a decision is made, the rationale for that decision should be documented. This includes a summary of the data on which the assessment, immediate response and individualized management plan were based, and the assignment of accountability for the implementation of the management plan. How and where cases are documented should be clearly set down in the school entity's local threat assessment procedures, and is particularly important in instances where team members work in different buildings. Whether it is a student management system, shared fileserver folder that is secure or in the Safe2Say Something management platform, all team members should have secure access and documentation should reflect when and by whom a record was last saved or updated. Being able to demonstrate rigor in how the Threat Assessment was conducted is essential, not least in responding to any subsequent inquiry as to how a potentially concerning situation or person was handled.

We will now work through the process steps, illustrating how these map on to the higher level framework for the conduct of Threat Assessment we looked at earlier in the training that proceeds from identifying situations or individuals who might pose a threat of violence, through gathering information, assessing the extent to which a threat is posed and finally to the management of the situation and mitigation of risk.

The process begins when a situation or person of concern is identified and is reported – typically, but not always – to the designated team leader of the Threat Assessment Team, who is often a senior administrator for the school entity. Reports may originate from school staff such as class teachers, or they could come from the Safe2Say Something Crisis Center analysts or a variety of other channels. Immediately, and to ensure any imminent threats are capable of being contained, an initial inquiry is conducted, marking the start of the Inquire step of the Threat Assessment process.

At this stage – referred to as the Intake and Initial Inquiry, with the information available, a decision needs to be made as to whether the situation or individual presents an imminent or direct threat to themselves or to others. If the answer is yes, immediate steps must be taken to contain the threat, protect any identified targets and, where a threat to self, the student themselves, and refer to law enforcement. In parallel, Child Protective Services may need to be alerted, as would the individual's caregivers and the target.

During the Initial Intake and Inquiry stage, immediately available information from initial interviews with, as relevant and practically achievable, the individual who might pose a threat, targets and any witnesses, and background knowledge is gathered and reviewed to determine whether or not a threat is actually there. An imminent threat, including of suicide or self-harm, may trigger the school entity's Crisis Response Protocol from their Emergency Operations Plan. These situations are relatively rare, and, in most cases, the threat would not be judged imminent or direct and the case would be triaged.

It is important for Threat Assessment Teams to recognize that, even where an imminent or direct threat was identified and law enforcement notified, the Threat Assessment is delayed only until the individual who might pose a threat of violence, target and wider environment has been made safe. Once that is achieved, the Threat Assessment process moves forward.

It is at this point that the Threat Assessment Team has the time – although this may still be limited – to gather more information about the nature of the threat and determine appropriate next steps.

Triage is conducted by the Team or, more usually, a subset of the full Team as determined appropriate by the Team Leader. The aim of the Triage step is to make an initial determination of the nature and level of threat. This involves deciding whether, with the information immediately available to the Team, they can determine with reasonable confidence whether the threat represents a low level of concern – what is termed a Transient Threat – or whether either the level of concern is higher or more information is needed – a Substantive Threat.

For example, a 4th grade student with significant developmental delay who makes a bomb threat would pose a low level of concern in that they lacked the ability to acquire bomb making materials and build a viable explosive device. While the student would undoubtedly require some form of support or intervention, the case here would in most instances be documented and closed after appropriate referrals had been made. However, if concerns remain, more information is gathered and, if the full Threat Assessment Team has not yet been involved, at this point, they would be.

A third determination – other than a Substantive or Transient Threat – is also possible, and this is that the individual poses no threat to others but does pose a threat to themselves. These cases will be rare as, in most cases, individuals at risk for suicide but posing no risk to others will have been identified and inducted into the established Act 71 pathways that exist in the school entity. If, however, it is the Threat Assessment Team that observe warning signs or risk factors for suicide risk, but no indicators of a threat to others, the student should be immediately referred to the school entity's Act 71 pathway or Crisis Response Team as appropriate. Should those teams then subsequently identify potential for threat to others, the student would be referred back into the Threat Assessment process but, unless that occurs – at which point it would be a new case, there is no further action and the case can be closed.

Of course, the Intake and Initial Inquiry and Triage steps are, in some situations, very rapid, such as where the presence of a weapon, specificity of targeting or other research and planning behaviors come to light, or where there is a potential high discipline consequence. In these cases, the initial information gathered is sufficient to trigger immediate action.

If, in triaging the case, it is determined that concerns are present or that more information is needed, a Full Inquiry should be initiated. At this stage, the threat would be regarded as Substantive.

We know that a high proportion of those assessed as posing a threat of violence to others are also at risk for suicide and Threat Assessment Teams are advised to screen for suicide risk at this stage.

Regardless of the outcome of the suicide risk screening, Substantive Threats will require the Threat Assessment Team to mobilize fully and to notify and protect intended targets. In addition however, if the suicide risk screening identifies that the student is at risk for suicide, they should be referred to the Act 71 team or Crisis Response Team – those responsible for suicide risk assessment and intervention. From this point onward, close coordination between the Threat Assessment Team and the Act 71 or Crisis Response Teams is required to ensure intervention efforts are mutually supportive.

During the conduct of a Full Inquiry, further information should be gathered and reviewed and would include a review of existing information such as available in the cumulative student record or online resources. New information would be gathered to include interviews with teachers or others in the building who know the

individual well, colleagues where it is an adult who is the target, as well as with witnesses and the individual who might pose a threat of violence themselves.

Searches of the individual who might pose a threat of violence or their belongings, a review of their social media presence or internet usage would be considered. School Resource Officers or other Law Enforcement Officers will provide active support, both where they have a role as a standing Threat Assessment Team member, and, more generally, where the nature and severity of the threat requires it. In the most extreme cases, further information may be gathered through parent interviews and, in some instances, from external third parties such as through collaboration with law enforcement or mental health providers.

Gathering information from multiple sources enables information to be corroborated and subjective decisions to be triangulated so that they become increasingly less subjective. The Threat Assessment Team gathers information that is available in a timely manner, typically hours or days, and not weeks.

Assessing the potential threat requires the Team to weigh the information and firstly make a determination as to whether a threat is posed. If not, and the individual is not in need of help, the case can be documented and closed. If no threat is posed, but, as is often the case, the individual is judged to need help of some form, the Team should ensure a referral and assistance plan is developed and implemented, monitored and that follow-up is carried out to address any underlying problems.

Where the assessment leads to a judgment that a threat is posed, an individualized management plan, proportionate to the nature and acuity of threat posed and tailored to the specific needs of each case, should be developed and implemented. While this may involve punitive measures, in many cases managing threats effectively requires a holistic approach that may prominently feature positive behavioral interventions led by school or Intermediate Unit resources, or, therapeutic mental health or counseling support provided by external resources. In all cases, monitoring the progress of individuals and following up where needed should occur. Neglecting this step, once the immediacy of the threat has diminished, is a common problem and can result in a threat re-emerging.

When the video finishes, open the session up to any points requiring clarification and then to discussion on what the model process shows and any differences found between the model process and that in use in their own context.

SECTION 5 | IDENTIFYING AND REPORTING THREATS

Instructor-led presentation with maximized participant engagement

SLIDES 42 to 43 – The Importance of Reporting



The importance of reporting

- Identifying individuals or situations of concern depends upon the willingness and ability of the school community to communicate with the TAT...
- ...and the **ability to recognize warning signs**

? *How can we educate the school community on what to be alert for and how and when to report? And do so without creating a climate of fear and mistrust?*

- Early intervention to manage threats is best achieved when the whole school community are encouraged to report **any threats or other behavior that they find troubling or upsetting**
- However, TATs must be cognizant of the difference between **reactive aggression** (handled in most cases through established conduct and discipline mechanisms) and **proactive aggression** (what TA deals with)



Comment on how, if the Threat Assessment process is to work effectively, the foundation is for schools to find ways to encourage everyone within the school community – students, employees, and caregivers alike – to report concerns to the Team when they have them.

Identification of individuals or situations of concern depends, in large part, upon the willingness and ability of the school community to communicate with the Threat Assessment Team and make the Team aware of any concerns or suspicions they may have about a particular individual's behavior.

Therefore, a critical element of the Threat Assessment process is to encourage everyone in the school community to be alert for warning signs and report them. Training should also, explicitly, feature learning to recognize and eliminate implicit (and explicit!) bias. What information is reported to the Team will depend on how the school community is educated about reporting.

Pose the question: How can we educate the school community on what to be alert for and how and when to report? And do so without creating a climate of fear and mistrust? Elicit responses such as educating through posters, web-based resources, short presentations at PTA/PTO meetings, incorporation within lessons/homeroom periods, etc. And, in relation to doing this without creating a climate of fear, it will be important that any messaging is sensitively crafted. Messaging must be equity-based in not linking threat to a particular student profile – whether neighborhood, ethnicity, gender, religion, etc. And it must be *positive*, in articulating that the Threat Assessment and Management process is designed to identify those at risk for violence early, so that appropriate intervention can be implemented that, not only protects potential targets, but is *aimed at understanding and helping the student posing a threat of violence* address the underlying grievance and the ideation of inflicting of violence as a means to resolving the grievance.

Threat Assessment is to be viewed as one component of an overall strategy to reduce school violence and implemented within the larger context of strategies to promote, safe, secure and pro-social environments.

Explain that, what and when to report and the mechanisms for reporting will be discussed later in this section and the training participants must understand that a shared commitment to reporting is essential if intervention early on the pathway to violence is to be achieved.

The first step in developing the ability and willingness to report is educating the school community on what represents a threat – in other words, what should be reported and what should not be reported. Lack of clarity on this can lead to both under- and over-reporting. It is worth making the point here, though, that over-reporting – while this can lead to fatigue and de-sensitization (unintended consequences that must be guarded against, and which can be minimized through education of the school community) within the Threat Assessment Team – is preferable to under-reporting!

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SLIDE 44 – Distinction between Reactive and Proactive Aggression and Violence

Reactive and proactive aggression and violence

Reactive

- Fight or flight response to a perceived threat
- Fueled by adrenaline
- Aggressors lose control
- Emotional/tantrum
- **Goal:** Threat Reduction – self-defense

Remember... Attackers don't snap. They decide

Proactive

- Conscious response
- Fueled by *intent*
- Little or no emotion
- Predatory
- **Goal:** Multiple... notoriety, revenge, status, money, power, assumption of control over destiny, promotion of religious or political beliefs...
- ...anything that the subject rationalizes will be 'won' by their actions

At a high level, the first aspect of school violence that should be considered when determining what is, and what is not, a threat of targeted violence, is whether the aggression that will translate to an act of violence is 'reactive' or 'proactive'.

Given that the population of students in K-12 learning environment range in age from 5 through 18 or 21 (in some circumstances), it is especially important to review the difference between reactive (or affective) violence and proactive (or targeted) violence.

Reactive aggression involves a fight or flight type of response, it is highly emotional and stems from a provocation or perceived threat. This is the most common type of violence and the individual may react by throwing something, slamming a door, yelling and voicing threats, or less frequently, physical contact or an assault.

Proactive aggression, on the other hand, is intentional, predatory, planned, and unemotional. It consists of behaviors that are intended to gain a reward or achieve a goal for the perpetrator. The rewards might be notoriety, revenge, status, money, power, assumption of control over destiny or the promotion of certain religious or political beliefs – anything that the individual rationalizes will be 'won' by their actions. It is this type of violence – targeted violence – that we are focused on addressing through threat assessment.

Remember: Attackers¹⁷ don't snap. They decide.

It is also worth noting to the participants, as a talking point, that some Threat Assessment Teams/school entities sometimes look at both reactive and proactive aggression and violence through the threat assessment lens. The reason for this is to use the skills and experience of the Threat Assessment Team and the rigor of the process to 'cast a wider net'. This is useful where the goal is to help students build the capacity within themselves to resolve conflicts without resorting to violence. In most cases, of course, the cases of reactive aggression will be screened out at the Intake and Initial Inquiry and Triage steps and handled at the school with appropriately proportionate interventions. But, if there is any indication that there is the potential for continual threat of harm or the violence is part of a recurrent pattern, or there is an impact on others that needs follow up, the process can then move quickly into Threat Assessment proper. So, while technically reactive aggression, adopting this mindset will see the Threat Assessment Team moving forward and applying their skills, experience and process to deal with situations where, for instance, a student has a history of fighting or a comment is made during an incident that would indicate the potential for continued or escalating harm. While in many instances, the final assessment of the level of concern is low, the Threat Assessment process has been used to give the Team a toolkit and approach to use to document interventions and monitor progress.

Think of it this way: Although a single incident of reactive violence may be transient, and lack the conscious, predatory intent of proactive (targeted) violence, where it is something that happens again and again, the impact on those affected by the violence can be significantly harmful or disruptive and may indicate underlying stressors, triggers or emotional control ('anger management') issues that the Threat Assessment process can usefully get to the bottom of and provide the mechanism for positive supporting intervention. In the case of a student with a disability, such repetitive behavior should prompt notification to appropriate special education personnel.

¹⁷ Where they are individuals of concern in the context of Threat Assessment.

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SLIDE 45-46 – Behaviors Notifiable to Law Enforcement

Behaviors notifiable to Law Enforcement

- The PA School Code and wider state law requires a number of incident types to immediately be reported to law enforcement, including:
 - Homicide
 - Aggravated assault
 - Stalking
 - Kidnapping
 - Unlawful restraint
 - Rape
 - Sexual assault
 - Arson
 - Institutional vandalism
 - Burglary
 - Criminal trespass
 - Riot
 - Possession of firearm by minor
 - Possession, use or sale of a controlled substance or drug paraphernalia



Explain that both best practice and Pennsylvania state law require that reports regarding student behaviors should immediately be made to local law enforcement¹⁸ where the student or situation of concern involves:

Section 1303-A of the PA Public School Code requires immediate reporting of certain incidents by the Chief School Administrator to local law enforcement when they are committed on school property, at any school-sponsored activity, or on a school bus or conveyance providing transportation to or from school or a school-sponsored activity. These include attempts, solicitation, or conspiracy to commit any of the following:

- Homicide.
- Aggravated assault.
- Stalking.
- Kidnapping.
- Unlawful restraint.
- Rape.
- Sexual assault.
- Arson.
- Institutional vandalism.
- Burglary.
- Criminal trespass.
- Riot.
- Possession of firearm by minor.
- Possession, use or sale of a controlled substance or drug paraphernalia.

¹⁸ [22 Pa. Code, Chapter 10. Safe Schools. § 10.21. Immediate Notification.](#)

For the full detail of mandatory and discretionary incident notification to law enforcement, direct the participants to PA School Code (24 P.S. Education § 13-1303-A § 13-1303-A. Reporting) and Chapter 10 (Safe Schools) regulations.

Behaviors notifiable to Law Enforcement

- Regardless of law enforcement action, Teams should conduct their own assessment to ensure the school is ready to respond to any risks / offer supportive interventions
- TATs must be familiar with these as they may discover criminal allegations or concerning behaviors as to criminal behavior in the process of their work
- Note, however, this reporting is a ***school administration duty***, not a TAT duty
- In addition, school entities must immediately notify, as soon as practicable, the caregiver(s) of a victim or suspect directly involved in these incidents
- Caregivers must be informed as to whether the local police department has been, or may be, notified of the incident
- Again, while not a duty of the Team, in practical terms, where this relates to a TA case, it may well be the TAT who make the notification
- TATs must be clear on the procedures related law enforcement notification associated with students with a disability



Regardless of law enforcement action, however, school teams should also conduct their own assessment to ensure that, regardless of the outcome of any potential criminal violations, the school is prepared to respond to any safety risks and to offer supportive interventions to both the individual who made the threat as well as any potential victims.

Threat Assessment Teams must be familiar with these as they may discover criminal allegations or concerning behaviors as to criminal behavior in the process of their work.

Note, however, this reporting is a ***school administration duty***, not a Threat Assessment Team duty. In addition, school entities must immediately notify, as soon as practicable, the caregiver(s) of a victim or suspect directly involved in these incidents, informing the caregiver(s) as to whether the local police department having jurisdiction over the property of the school entity has been, or may be, notified of the incident. Again, this is an administrative duty of the school although in practical terms, where this relates to a Threat Assessment case, it may well be the Threat Assessment Team who make the notification. The individual making such notification must document attempts to reach the caregiver(s).

Threat Assessment Teams should also be familiar with the requirements and policies for sharing information and records with law enforcement regarding notifications associated with a student with a disability.

It is also important to note that some of these incidents or similar actions may require reporting and handling under board policies or legal statutes related to bullying, discrimination or harassment, Title IX sexual harassment, hazing or related areas. While not the role of the Threat Assessment Team, where it is the Team who first identify an instance of these other reportable behaviors, they would be responsible for ensuring information was passed to the appropriate reporters.

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SLIDE 47 – Reportable Behaviors and Leakage

Reportable behaviors and 'Leakage'

- **Threat:** A concerning communication or behavior that suggests a person may intend to harm themselves or someone else... It is an *expression of intention* to inflict injury or damage and often one of the first ways a person of concern may be identified
- Could be an actual expression of intent to do harm, a "leakage" of violent thought, or an inappropriate statement
- **Leakage:** *Communication* to a 3rd party of an intent to do harm to a target
- Communication varies: Planned or spontaneous utterances, letters, diaries, emails, journals, social media posts, text messages, video recordings...
- Leakage could be intentional or unintentional

 *Why might leakage be intentional on the part of the subject?*

- **Fact:** Behavioral Threat Assessment research finds leakage *very frequently occurs*



[The Concept of Leakage in Threat Assessment](#)



Now move on to discuss reportable behaviors – those reported to the Threat Assessment Team, whether ultimately reportable to law enforcement or not – more generally.

Recap on the definition of a threat: A concerning communication or behavior that suggests a person may intend to harm themselves or someone else. A threat, then, is an expression of intention to inflict injury or damage and is often one of the first ways a person of concern may be identified. Whether it is an actual expression of intent to do harm, a "leakage" of violent thought, or merely an inappropriate statement, it is something that needs further exploration and warrants reporting.

Leakage is an important concept to understand. Leakage¹⁹ is the communication to a third party of an intent to do harm to a target. Third parties are typically other people, but the means of communication could vary widely, from planned or spontaneous utterances, to letters, diaries, emails, voice mails, blogs, journals, social media postings, text messages, or video recordings.

Unintentional leakage can occur when the individual posing a threat of violence did not intend a third party to see or hear the communication, or grasp the meaning or believed they would not report it, or the leakage could be quite intentional on the part of the individual – for instance where they possessed a powerful sense of infallibility or were goading or challenging others to try and stop them.

It is a fact established through the body of behavioral threat assessment research that leakage very frequently occurs, and it can provide valuable early warning of an act of violence... but only if the school community know what to look and listen for and how and to whom to report it.



[The Concept of Leakage in Threat Assessment](#)

¹⁹ J. R. Meloy and M. E. O'Toole in *The Concept of Leakage in Threat Assessment*; Behav. Sci. Law (2011).

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SLIDE 48 – Examples of Reportable Behaviors

Reportable behaviors: Examples

- Physical violence toward a person or property
- Direct or indirect threats of violence
- Bullying that continues after interventions to stop the behavior
- Possession of weapons on school grounds or school events
- Any statements or behaviors indicating suicidal thoughts or behaviors
- Any behaviors or communications that suggest the individual has engaged in:
 - Research or planning related to carrying out a targeted attack
 - Efforts to acquire the means to engage in an attack
 - End of life planning



Whether an individual has actually conveyed a direct threat should not be a driving factor in the decision to follow through on a report. In fact, for a person who truly intends to do harm, making a direct threat would be quite counterproductive.

Reportable behaviors, then, are 'warnings' that precede an act of targeted violence, are related to it, and may, in certain cases, predict it. Although not a complete list, some examples of reportable behavior include:

- Physical violence toward a person or property.
- Direct or indirect threats of violence.
- Bullying that continues after interventions to stop the behavior.
- Possession of weapons on school grounds or school events.
- Any statements or behaviors indicating suicidal thoughts or behaviors.
- Any behaviors or communications that suggest the individual has engaged in:
 - Research or planning related to carrying out a violent act.
 - Efforts to acquire the means to engage in a violent act.
 - End of life planning, which might include acts such as giving away prized possessions or behavior that suggests someone 'putting their affairs in order'.

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SLIDE 49 – Examples of Reportable Behaviors

Reportable behaviors: Other concerning behaviors

- Any act, gesture or statement that would be interpreted by a reasonable person as threatening or intimidating, such as:
 - Overt physical or verbal intimidation
 - Throwing objects or other gestures intended to cause fear
 - Making contextually inappropriate statements about harming others
- Unusual or bizarre behavior that would cause a reasonable person to fear injury or harm due to its nature and severity, such as:
 - Stalking
 - Erratic or bizarre behavior suggestive of mental disturbance or substance abuse
 - Fixation with mass murder, weapons, or violence generally
 - Fixation with hate group, terrorist, or extremist material



In addition to the behaviors, communications or other identifiers set out here that an individual is on the pathway to violence, we should also consider other concerning behaviors:

- Any act, gesture or statement that would be interpreted by a reasonable person as threatening or intimidating, such as overt physical or verbal intimidation, throwing objects or other gestures intended to cause fear, or making contextually inappropriate statements about harming others.
- Unusual or bizarre behavior that would cause a reasonable person to fear injury or harm due to its nature and severity, such as: stalking; erratic or bizarre behavior suggestive of mental disturbance or substance use disorder; fixation with mass murder, weapons, or violence generally; or fixation with hate group, terrorist, or extremist material.

Videos and facilitated discussion

SLIDE 50 – Identifying Threats Video 1



Ask the participants to watch the series of short video vignettes and reflect on whether what they are seeing – and based on their developing understanding of the concept of threats and the Threat Assessment process

– whether it represents ***concerning behavior indicative of potential proactive violence*** (and so warrants reporting and the activation of the Threat Assessment Team) or, if not immediately evident, would nevertheless warrant follow up by the Threat Assessment Team.

For each, ask the participant group whether what they are seeing is something they have encountered in some form, and for their observations as to what may be of concern. Facilitate a discussion but avoid progressing too deeply into the concept of assessment (i.e., the assigning of a rating of the imminence and severity of the threat, as that will be covered later in the training). Guide the participants to identify the primary concern, the information they know based on the video and whether or not, based on what they have seen, they can determine whether a threat exists. Probe for what questions are relevant to explore (stay with questions and avoid getting into sources of information at this point as that will be the focus of the next section). Suggested 'opener' questions are set out below the video scripts in this Handbook.

Explain to the participants that a number of the videos will continue at later stages in the training, providing a narrative as to how the Threat Assessment process might play out, and illustrating some of the complexity involved in Threat Assessment.

(Video 1). Are those guns real?! | Middle School:

Kids on a school bus heading home at the end of the school day. Group of three boys talking; one Boy 1 is showing pictures on his phone to the others. "Check it out!"

Boy 2 Ethan "Is that real?"

Boy 3 Daniel "Snickers... ya right?... no way"

Boy 1 Anthony "Yes, it is.. Look" ... He shows more pictures of guns and one with him holding a gun looking like a tough guy. "I found 'em in my brothers' room"

Boy 2 Ethan "Hey... bring it to school tomorrow!"

Anthony... "Yea..." shakes head positively... "yea...maybe I will... I'm sick of that place... friggin' teachers... I'd like to take 'em all out..." All three appear pleased with the idea... bus stops and driver yells, "Come on you guys!" They grab their things and get off the bus.

This scene is being observed by a boy in one of the rows but not directly engaged. Trying to look cool but not comfortable. He does not get off the bus (not his stop). Looks concerned.

Observer boy walks up driveway to his house, his dad is there arranging things in the garage. He greets his son. "Hey! How was your day?" Boy just looks at him.

Cut to principal answering the phone, he listens intently... and then says, "Thank you for calling, Mr. Smith. We will definitely want to look into this. Does he know the boys' names? (Writes down what he is told)... What bus number does Noah ride? Writes...OK. Thanks for bringing this to my attention. I will be in touch."

Questions for the group:

- What is the primary concern in this video? Threat to the school community from a student; potential access to weapons.
- What information do you have? Potential weapon access; potential view of violence as acceptable; potential grievance.

SLIDE 51 – Identifying Threats Video 2



(Video 2). They're all on my hit list... | High School

A high school teacher goes to the school security officer's office where he is sitting at his desk. She knocks on the door to get his attention. He says, "Hey! How's it going?". Looking concerned but unsure, she says, "I'm ok... um... Do you know Ben Thompson? He's in 9th grade..."

SSO: "Yea... I do actually... he's had some issues this year, what's up?"

Teacher: "Well, he's in my art class and there's been some problems between him and a couple of girls in there... nothing I really thought too much about but I was in the cafeteria today and I overheard him talking with another kid, I don't know his name, but Ben was saying something about having a list of people he hated and wanted to kill...so I wanted to let you know and see what you thought..."

Questions for the group:

- What is the primary concern in this video? Threat to the school community from a student.
- What information do you have? Potential grievance; peer conflict.

SLIDE 52 – Identifying Threats Video 3



(Video 3). I'm really worried about him... | High School

Two high school students (one boy and one girl) are talking in a school hallway... you cannot hear what they are saying. Boy is looking down, morose, hair and clothing disheveled (depressed appearing). He is holding a couple of books – a notebook and a journal. Girl appears to be trying to convince him of something, touching his arm,

worried (the video narrator's voice says that they are friends, and that he has disclosed that he has been thinking of killing himself and others).

Their voices become audible. She says, "Look, I'm worried about you..." He turns abruptly and walks away. She looks after him, clearly anxious...

Next scene... Girl walks into the counseling office visibly upset - looking anxious and agitated... (in a hurry to see her school counselor). Asks receptionist, "Is Ms. Cassidy in?" Receptionist with a smile says, "sure, go on in!". She walks into the office.

Girl: "Ms. Cassidy?"

Ms. Cassidy: "Hi Gina... what's wrong?" smiling as she looks up, but quickly looks concerned.

Gina: "It's my friend Anthony... he's really depressed and angry and things are getting worse. He showed me his journal this morning and it's filled with all these sad poems and drawings... and I am just really worried, and I don't know what to do!... I'm afraid he's going to do something!"

Questions for the group:

- What is the primary concern in this video? Threat to self.
- What information do you have? Change in behavior; potential feelings of hopelessness.

SLIDE 53 – Identifying Threats Video 4



(Video 4). CreepyPasta drawings... | Elementary

Empty 4th grade classroom before start of school day. Teacher is at his desk grading a stack of papers, flipping each one over as he grades it and moving on to the next one. He stops on one and gets a concerned look, tilting his head to the side. The paper is a math worksheet – some of the math problems have been scribbled through messily and around the margins are round faces drawn with "X's" for eyes. With a curious and concerned expression, the teacher stands and moves to a student's desk and lifts up the hinged top to look inside. There are a few papers laying on the top on the books that are inside. The top sheet has a drawing of Slenderman. Teacher picks the papers up and each of the others (three) also have disturbing drawings – Slenderman and Jeff the Killer.

Questions for the group:

- What is the primary concern in this video? Atypical behavior.

- What information do you have? Drawings which are possibly suggestive of a preoccupation with 'dark' themes.

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SLIDE 54 – Who Reports, and How to Report (Slide 1 of 2)

Who reports, and how to report

- The ability of TATs to assess and intervene early is contingent on all potential reporters – the **school community as a whole** - being:
 - Clear on what represents concerning or aberrant communication and behavior
 - Having confidence their concerns will be heard – and by whom and by what process
- Requires the TAT to ensure the school community:
 - Can recognize concerning or aberrant behavior and communication
 - Know the reporting channels and the TA process and personnel reports will 'activate'

❓ *Who are threats reported to in your context?
How is this known to the school community?*



School personnel have a duty to report behavior that may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others. But, in order to optimize the ability of a Threat Assessment Team to assess and intervene early, not only staff, but students – including self-reporting by students posing a threat of violence, caregivers, volunteers, contractors – the school community as a whole – should be supported to report concerning behavior or communications.

To achieve this, the school community need to be clear on what those communications and behavior might look like, but also have confidence that their concerns will be heard, which includes clarity on the Threat Assessment process and those involved in it.

Anyone who believes that a person or situation poses a clear and immediate threat of serious violence that requires containment should notify school security and/or law enforcement in accordance with school entity Emergency Operations Plans and specific Crisis Response protocols.

Explain that the subjectivity inherent in the phrase 'clear and immediate' will be explored later in the training when looking at the Assessment step of Threat Assessment, but that it is recognized that this can be a challenging judgment to make.

According to Pennsylvania law, part of the responsibilities of school Threat Assessment Teams is to designate the person or persons to whom threatening behavior should be reported so school personnel have some clarity about where to direct concerns when they have them.

Pose the questions back to the participant group: In your context, who is the 'fusion point' through whom threats are reported? How is this communicated to the school community?

Teams should consider designating a primary and, in case they are not available, a secondary individual responsible for monitoring all incoming reports and develop protocols for quickly assessing, responding, and making appropriate determinations and referrals – including as they relate to notifications received through *Safe2Say Something* or other anonymous school hotlines.

SLIDE 55 – Who Reports, and How to Report (Slide 2 of 2)

Who reports, and how to report

- Create multiple channels... all staff have a pastoral care role...
- Focus on fostering a positive school climate so barriers to reporting are broken down
- *Safe2Say Something*
- Act 44 required the establishment of Safe2Say, but it **does not create mandated reporting requirements**
- Instead, school entities **must develop procedures for assessing and responding to reports received through the Safe2Say Program**
- School entities do not report information to *Safe2Say Something*



Open with a simple statement: Create multiple channels. All staff, and not just those in counseling roles, have a pastoral care role to some degree, and while some students may be intimidated by meeting with a counselor, they may have a strong bond with a teacher, athletic coach, or could let something slip to the driver who has taken them on the same route for years.

The intent is to create a cultural disposition within the school toward reporting of concerns. Threat Assessment is one facet of allied approaches aimed at fostering a positive school climate. The net effect will be to break down barriers to reporting – something that will be looked at a little later in the training.

School entities should consider local mechanisms (outside of *Safe2Say Something* examined below) for people to report concerns anonymously – without having to identify themselves as the reporting party. In addition, developing efforts to periodically promote awareness about the Team to the school and community can help encourage reporting of concerns to the teams.

In 2018, the General Assembly passed Act 44 mandating the establishment of the *Safe2Say Something* anonymous reporting system for use by Pennsylvania school entities, effective January 2019. The *Safe2Say Something* Program is managed by the Pennsylvania Office of the Attorney General (OAG) and teaches students, educators, and administrators how to:

- Recognize the signs and signals of individuals who may be at risk of hurting themselves or others.
- Anonymously report this information through the app, website, or 24/7 Crisis Center Hotline.

It is important to note that while Act 44 required the establishment of Safe2Say, it does not create mandated reporting requirements. Instead, school entities must develop procedures for assessing and responding to reports received through the Safe2Say Program.

Participants will be aware of what Safe2Say Something is but will benefit from additional detail on the mechanics as this may aid in their thinking as to whether more localized reporting mechanisms may be useful in addition. Explain that the Safe2Say Something program operates as follows:

- A tip is submitted via mobile app, website, or phone call – arriving first at the *Safe2Say Something* Crisis Center.
- Crisis Center analysts vet and triage the tip, then engage the tipster in anonymous two-way chat in order to provide detailed and immediately actionable information to schools and 911 County Dispatch. Analysts are trained to categorize each tip as either “Life Safety – Imminent and In-Progress,” “Non-Life Safety Crime/Violence,” “Non-Life Safety,” or “Non-Notification” to help prioritize tips.
- Crisis Center analysts then deliver the tip to the impacted school and, as needed, local law enforcement via 911 County Dispatch.
- The school and, as needed, local law enforcement, assess and intervene with the student posing a threat of violence.
- The school then closes out the tip and reports actions taken as a record for their school.

Most school entities have developed procedures for implementation of the *Safe2Say Something* program and responding to reports as a part of their board policies and procedures. Threat Assessment Teams should also be aware of reporting that may come through other mechanisms for reports of bullying, discrimination/harassment, sexual harassment or dating violence, which may be brought to their attention if information indicates concern of a threat. School personnel designated to receive these reports should particularly be made aware of the Threat Assessment Team and notification processes.

Group discussion exercise

SLIDE 56 – Barriers to Reporting (Slide 1 of 3)

Barriers to reporting

What might create barriers to reporting? **How can we overcome these?**

- **Bystanders:** Anyone positioned to have awareness of risk factors or to observe warning behaviors related to a person who may be considering acting violent
- **Upstanders:** This is what we want bystanders to be... willing to report what they know or see to a caring adult, someone in a position of authority at school or to law enforcement
- School climate affects whether bystanders come forward with information

 [USSS & DOE Prior Knowledge of Potential School-Based Violence](#)

Introduce the exercise by asking the participants to talk at their tables and then that each group will have a chance to share out to the larger group.

Pose the question: What might be some barriers to reporting?

- Participants talk at their tables for approximately 10 minutes.
- Have each group share one barrier they have identified while you as the Facilitator list them for the group on a whiteboard or easel chart paper.
- As they share, introduce concept of bystander vs. upstander.
 - A "bystander" is anyone positioned to have awareness of risk factors or to observe warning behaviors related to a person who may be considering acting violent. The term "upstander" more accurately reflects the desired response in bystanders – that they will report what they know or see to a caring adult, someone in a position of authority at school or to law enforcement.
 - The 2008 U.S. Secret Service and DOE report, *Prior Knowledge of Potential School-Based Violence: Information Students Learn May Prevent a Targeted Attack*, examined the concept of bystanders and factors that influenced whether they would be upstanders. One conclusion that is of particular importance, in that it is in the hands of school administrations, is that ***school climate affected whether bystanders came forward with information related to threats.***



[USSS & DOE Prior Knowledge of Potential School-Based Violence](#)

- Ask for ideas about how these barriers can be overcome.

Collate, and then summarize the salient discussion points back to the group, and likely covering barriers that relate to:

- Threat Assessment Teams being uncomfortable with 'crying wolf' (voicing concerns which, ultimately, transpired to be unfounded), and creating that sense of fatigue or de-sensitization touched on at the beginning of the section.
- Fear of retaliation – from the student posing a threat of violence, caregivers and others in some way connected with the case.
- Fear of being wrong or that they won't be believed, and being negatively viewed by administrators, other colleagues or others connected to the school community.
- Fear of being sued.
- The assumption that, if it was a "real" concern, someone else will report; including where this is connected with a desire to not over-react or an unwillingness to get involved for whatever reason.
- A lack of clarity over whether and how information – particularly associated with mental health – can be accessed and/or shared.
- Perceptions around 'snitching' by/on students. And the concern that creating a (perceived) 'tattle-tale' culture will undermine school climate.

Direct participants to resources such as DHS' [Toolkit for Strengthening K12 Reporting Programs | Improving School Safety through Bystander Reporting \(2023\)](#).

SLIDE 57 – Barriers to Reporting (Slide 2 of 3)

Overcoming barriers to reporting

- There is no penalty for good faith reporting, even if the behavior seems low-level or unclear
- Open up discussions with the school entity solicitor on civil liability immunity as governed by local law. The context where guidance would be sought would relate to:
 - *Whether immunity from civil liability would exist...*
 - ...in circumstances where, *in good faith* with *reasonable cause* and *without malice*...
 - ... school personnel including TATs, but also the wider community of reporters which will include caregivers and students...
 - ... *reports, investigates, or causes an investigation to be made into information that any person poses a credible danger of serious bodily injury or death* to any other person on school property...
 - ...or *fails* to report, investigate or cause an investigation to be made, *in circumstances where they might reasonably be expected to have done so*.



From this point onward, lead the participant group to the following, and continue to encourage discussions within the participant group as to how these barriers can (and must) be overcome:

- There is no penalty for reporting, and that the Team wants to hear about behavior that causes some worry or concern, even if the behavior seems low-level or unclear.
- Good practice is to proactively open up discussions with school entity legal counsel with regard to civil liability immunity as governed by local law. The context where guidance would be sought would relate to:
 - *Whether immunity from civil liability would exist...*
 - ...in circumstances where, *in good faith* with *reasonable cause* and *without malice*...
 - ... school personnel including Threat Assessment Teams, but also the wider community of reporters which will include caregivers and students...
 - ... *reports, investigates, or causes an investigation to be made into information that any person poses a credible danger of serious bodily injury or death* to any other person on school property...
 - ...or *fails* to report, investigate or cause an investigation to be made, *in circumstances where they might reasonably be expected to have done so*.

It will be very important for Facilitators to candidly explore concerns within Teams and the wider 'reporting community'. Emphasize, therefore, the importance of documenting the rationale examined in the moment, of not silo-ing decision making, and of not conducting full investigations in line with advised practice.

The school entity's solicitor should be in a position to advise on case law that applies locally, including as it might relate to situations that may warrant specific handling, such as a special education court order or disciplinary case history.

One area of the law that is evolving continuously is that which relates to social media. Threat Assessment Teams should seek specific guidance from the school entity's solicitor on circumstances involving social media off school campus where natural concerns about the ability of schools to intervene in a disciplinary sense²⁰ should **not be confused** with the school's ability to integrate information obtained from social media posts and other online forums into the Threat Assessment process to monitor and provide support to students who may be on the pathway to violence.

SLIDE 58 – Barriers to Reporting (Slide 3 of 3)

Overcoming barriers to reporting

- Under state law, Teams **must** ensure that **school employees**: 1). Are aware of who TAT members are and how to report threatening or at-risk behavior; 2). Have access to informational materials regarding recognition of threatening or at-risk behavior that may present a threat
- TAT's effectiveness contingent on educating the **whole school community**
- Team's efforts are oriented around assistance, not punitive actions...
- ...emphasize reporting as an act of caring; not "snitching" or "tattling"
- Provide multiple ways to report a concern
- Create a **culture of shared responsibility** helps turn **bystanders into upstanders**
- "Loop back" with anyone who reports a threat to let them know their report led to a better understanding of the situation and allowed interventions to be put into place



- Threat Assessment Teams in Pennsylvania are required to make informational materials available to 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, as well as how to report their concerns. This can include reporting through the *Safe2Say Something* Program, which went online in January 2019 and participation in which is mandatory for school entities, or through other school reporting mechanisms and tools.
- Under state law, Teams must also ensure that school employees are aware of the staff members who are appointed to the Threat Assessment Team(s), and how to report threatening or at-risk behavior, including through the *Safe2Say Something* Program. While not required under statute, it is recommended that students, teachers, staff, School Security Personnel²¹, other school personnel, and caregivers be provided training and guidance on recognizing behaviors of concern, their roles and responsibilities in reporting the behavior, and how they should report that information.
- Emphasize that the Team's efforts are oriented around assistance, not primarily (or solely) punitive actions. Positive behavioral interventions and allied actions will have greatest impact and be more

²⁰ And, for example, as seen in court findings against school entities related to, among other things, 1st Amendment rights and jurisdictional claims, e.g., (B.L. v. Mahanoy Area School District, No. 19-1842 (3d Cir. 2020) and J.S. v. Manheim Twp. Sch. Dist., 2020 WL 2508031 (Pa. Commw. Ct., May 13, 2020).

²¹ Comprising: School Police Officer, School Resource Officer or School Security Guard.

likely to be able to be deployed if concerning behavior is detected early and the individual is not already advanced on the pathway to violence.

- Encouraging reporting can be accomplished through various mechanisms such as general awareness training for the entire school, providing multiple ways to report a concern to the Team, and notification to caregiver(s).
- Members of the school community should be encouraged on an ongoing basis to report any threatening communication or concerning behavior and be reminded that reporting is an act of caring and not "snitching" or "tattling".
- From PAS²²:
 - Every attacker included in this analysis ($n = 35$, 100%) exhibited concerning behaviors prior to their attack. In all but two of these cases (94%), concerning behaviors were displayed at school.
 - About three-quarters of the attackers (77%) displayed concerning behaviors at home or in the community, and three-quarters displayed them online (74%).
 - In most of the cases (80%), the attacker's behavior elicited concern from bystanders regarding the safety of the attacker or those around them, and the majority of attackers shared concerning communications verbally through in-person statements (89%). Creating a culture of shared responsibility helps to turn bystanders into upstanders.
- "Looping back" with anyone who reports a threat to let them know their report was appreciated and contributed to a better understanding of the individual's situation and allowed interventions to be put into place (or something be done) is important if a 'culture' of caring and vigilance is to be fostered. Team members should be cautious not to share confidential information about any aspect of the case, but rather thank the reporter and let them know their report was helpful in the process.

²² Protecting America's Schools: A U.S. Secret Service Analysis of Targeted School Violence (2019).

SECTION 6 | GATHERING INFORMATION

Instructor-led presentation with maximized participant engagement

SLIDES 59 to 60 – The Focus of Information Gathering



The focus of information gathering

- Behavioral Threat Assessment and Management is a **fact-based** process
- Gathering information – the **facts** upon which analysis and assessment is performed – is centrally important
- Potentially enormous amount of information; requires a coherent approach to how we gather information
- Continuously reflect on all parts of **STEP** to ensure vital information is not missed
- Focus on NTAC's **investigative themes**... These are evidence-based, good practice
- For each of the themes, pose a question that will open up the line of inquiry



Open this section with the following: As we have said earlier, Behavioral Threat Assessment and Management is a **fact-based process**. As a consequence, this section on Gathering Information – the **facts** upon which analysis and assessment of the level and nature of threat is performed – is centrally important and requires detailed exploration.

Explain that effective information gathering used to assess an individual of concern involves, as a very first step, identifying the sources that may have information on the individual's actions and circumstances. This involves exploring records and other existing sources for information as well as identifying the persons with whom the individual has a relationship or frequently interacts with, recognizing that individuals operate within multiple "systems" to include school, family, and the larger community.

Focus of Information Gathering

Explain that, as we would all recognize, there is potentially an enormous amount of information and so we must adopt a coherent approach to how we gather it.

Threat Assessment Teams are advised to break down the potential information into thematic areas in the first instance. As discussed earlier, teams can use the acronym STEP[©], referring to Subject, Target, Environment and Precipitating Events, as this thematic framework. Team members can use their respective position or role to gather relevant information within each of these domains.

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SLIDE 61 – Investigative Themes used to Structure Information Gathering (Slide 1 of 4)

Investigative themes

Motive

- What are the student's motive(s) and goals? What first brought them to someone's attention?

Communications

- Have there been any communications suggesting ideas, intent, planning or preparation for violence?

Inappropriate Interests

- Has the student shown any inappropriate interest in, fascination, and / or identification with other incidents of mass attacks or other acts of targeted violence?



Explain how, within the high-level STEP[©] framework, Threat Assessment Teams should then focus on what NTAC call 'Investigative Themes.'²³ Gathering information in this way will ensure a balanced view of the threat posed is reached.

Additionally, Threat Assessment Teams are advised to frame these investigative themes as questions, as this is an effective way of moving most quickly to the next step in the process, that is: the assessment of the nature and probability of risk presented by the concerning communication or behavior.

These investigative themes and questions statements are, not only consistent with the NTAC's Threat Assessment Model (developed by the US Secret Service and Department of Education across nearly 20 years of focused research), but also those found within the Model PCCD K-12 Threat Assessment Procedures and Guidelines, the broader research body on targeted violence, and applied threat assessment and management practice. They are evidence-based good practice.

Here, the trainer should present the question on the slide and ask the participants to reflect, as a table, on what, specifically, the question is trying to discern or answers to these questions might be, and so provide clear

²³ [Enhancing School Safety Using A Threat Assessment Model - An Operational Guide for Preventing Targeted School Violence](#); National Threat Assessment Center, July 2018

direction to their information gathering efforts. This will provide an overview of these themes, as we will be using them in the group exercise we have coming up, where you'll get to handle a case.

Motive

What are the motive(s) and goals of the student posing a threat of violence? What first brought them to someone's attention?

Students posing a threat of violence may have a variety of motives that place them at risk for violence, whether to themselves or others. If you can discover the individual's motivation for engaging in the concerning behavior that brought them to the attention of the Team, then you can understand more about their goals. Understanding motive further allows the Team to develop management strategies that can direct the individual away from violent choices.

Sub-questions in this investigative theme might be:

- Does the individual have a major grievance or grudge? Against whom or against what?
- Does the situation or circumstance that led to these statements or actions still exist?
- What efforts have been made to resolve the problem and what has been the result?
- Does the individual feel that any part of the problem is resolved or see any alternatives?
- Has the individual previously come to someone's attention or raised concern in a way that suggested they need intervention or supportive services?

Communications

Have there been any communications suggesting ideas, intent, planning or preparation for violence?

Look for concerning, unusual, bizarre, threatening, or violent communications the individual made. Communications may reveal grievances held about certain issues or a possible intended target. They may allude to violent intentions or warn others to stay away from school at a certain time. They may reveal information relevant to the other investigative themes by making reference to feelings of hopelessness or suicide, a fascination with violence, interest in weapons, or other inappropriate interests. These statements might be made in person to classmates, teammates, or friends; in writing on assignments or tests; and/or via social media, text messages, or photo or video-sharing sites.

Earlier NTAC research that examined attacks on schools found that not every student directly threatened their target prior to attack, but in a majority of incidents (81%), another person was aware of what the student was thinking or planning. It is important for Teams to remember that an individual who has not made threatening statements may still be at risk for engaging in violence. Whether or not they made a direct threat should not be the lone indicator of concern.

Sub-questions in this investigative theme might be:

- What, if anything, has the individual communicated to someone else (targets, friends, teachers, others) or written in a diary, journal, email, or website concerning his or her grievances, ideas and/or intentions?
- What is it about the communications that are concerning or unusual in the context of the individual?
- Do the communications provide insight about grievances, ideation, planning, preparation, timing, targets, etc.?
- Has anyone been alerted or "warned away"?

Inappropriate interests

Has the student posing a threat of violence shown any inappropriate interest in, fascination, and/or identification with other incidents of mass/targeted violence or targeted violence?

Gather information about whether they have shown an inappropriate or heightened interest in concerning topics such as school attacks or attackers, mass attacks, or other types of violence or self-harm. These interests might appear in their communications, the books they read, movies they watch, or activities they enjoy. The context of the individual's interests is an important factor to consider.

For example, an individual's interest in weapons may not be concerning if they are a hunter or on a school's rifle team, with no evidence of an inappropriate or unhealthy fixation on weapons. In other situations, the context surrounding an interest in weapons could be of concern. For example, if they are fixated on past school shooters or discusses what firearm would be best to use in a mass attack.

Sub-questions in this investigative theme might focus on evidence of inappropriate interest of:

- Previous perpetrators of targeted violence.
- Grievances of other perpetrators.
- Weapons/tactics of perpetrators.
- Effect or notoriety of perpetrators.

A "yes" to this question alone does not necessarily indicate that the individual poses a threat or is otherwise in need of some assistance. However, if they show some fascination or fixation on any of these topics and has raised concern in another way, such as by expressing an idea to do harm to others or to self, recently obtaining a weapon, or showing helplessness or despair; the combination of these facts should increase the Team's concern about the individual.

SLIDE 62– Investigative Themes used to Structure Information Gathering (Slide 2 of 4)

Investigative themes

Weapons Access

- Does the student have (or are they developing) the capacity to carry out an act of targeted violence?

Stressors

- Has, or is, the student experiencing stressful events, such as setbacks, challenges or losses or are there circumstances that might affect the likelihood of an escalation to violent behavior?

Desperation or Despair

- Is the student experiencing hopelessness, desperation, and/or despair?

Weapons Access

Does the individual who might pose a threat of violence have (or are they developing) the capacity to carry out an act of targeted violence?

In addition to determining whether the individual who might pose a threat of violence has any inappropriate interests or fascination with weapons, the Team should assess whether the individual has access to weapons. Because many school attackers used firearms acquired from their homes, consider whether the family keeps weapons at home or if there is a relative or friend who has weapons. Sometimes caregivers who keep weapons at home incorrectly assume that their children are unaware of where they are stored or how to access them. If there are weapons at home, the Team should determine if they are stored appropriately and if the individual knows how to use them or has done so in the past.

Not all caregivers will be forthcoming with information or responsive to inquiries. They may deny the situation, become hostile and confrontational or simply not respond. In addition, there may be communication barriers. Threat Assessment Team members may need to coordinate with local law enforcement to address concerns about weapons access.

The Team should also remember that firearms are not the only weapons to be concerned about. Even though many school attackers have used firearms in carrying out their attacks, explosives, incendiary devices, bladed weapons, or combinations of these weapons have been used in past attacks.

Sub-questions in this investigative theme might be:

- Does the individual who might pose a threat of violence have the means (e.g., access to a weapon) to carry out an attack?
- Are they trying to get the means to carry out an attack?
- How easy or difficult would it be for the individual to acquire the means to carry out an attack *and* does the individual have the intent and will to overcome obstacles to acquire the means?

Understanding these behaviors will give the team an indication of how far along the pathway of violence the individual who might pose a threat of violence has progressed and may also help the team understand how quickly the person is moving forward toward an attack — i.e., how imminent a threat there may be. Any attack-related behaviors should be seen as a serious indication of potential violence.

Stressors

Has, or is, the individual who might pose a threat of violence experiencing stressful events in their life, such as setbacks, challenges or losses or are there circumstances that might affect the likelihood of an escalation to violent behavior?

All people face stressors such as setbacks, losses, and other challenges as part of their lives. While many people are resilient and can overcome these situations, for some, these stressors may become overwhelming and ultimately influence their decision to carry out an attack at school. Gather information on stressors the individual who might pose a threat of violence is experiencing, current or past trauma, how the individual is coping with them, and whether there are supportive friends or family who can help the individual overcome them. Assess whether stressors experienced in the past are still having an effect, such as a move to a new school, and whether there might be additional setbacks or losses in the near future, like a relationship that might be ending.

Stressors can occur in all areas of a individual's life, including at school with coursework, friendships, romantic relationships, or teammates, or outside of school with caregivers, siblings, or at jobs. Many students can experience bullying, a stressor which can take place in person at school or online at home.

Sub-questions in this investigative theme might be:

- Is there anything that has happened recently or – as far as the individual who might pose a threat of violence is concerned – will plausibly happen in the near future – that, in the context of what we know about the individual's resilience or emotional state, could generate high levels of stress?
- What do we know about the details of the individual's home life, and relationships in and out of school that could generate stress for them?
- Are Threat Assessment Team interventions escalating, de-escalating, or having no effect on movement toward violence? In the longitudinal case management, where Threat Assessment Teams have referred students to other support pathways, it will be important for the Team to establish protocols that enable the tracking of the outcomes of the intervention, for instance in agreeing scheduled check-ins between the Team and the other support provider, for instance the Act 71 team where it is established that the individual posed a risk for violence to both themselves and others.
- What is the response of others who know about the individual's ideas or plans? To actively discourage student from acting violently; to encourage them to attack; to deny the possibility of violence; or to passively collude with an attack, etc.?

These questions underscore the principle that violence risk is dynamic. By asking these questions, the Team can identify what factors in the individual who might pose a threat of violence's life might change in the near- to mid-term, and whether those changes could make things better or worse for them.

Desperation or Despair

Is the individual who might pose a threat of violence experiencing hopelessness, desperation, and/or despair?

Many persons who have engaged in targeted violence have been despondent and/or suicidal prior to their attacks or at the time of their attacks. Most people who are feeling hopeless, desperate, or even suicidal **will not pose a threat of harm to others**.

Sub-questions in this investigative theme might be:

- Is there information to suggest that the individual is feeling desperation and/or despair?
- Have they experienced a recent failure, loss and/or loss of status?
- Is the individual having significant difficulty coping with a stressful event?
- Have they engaged in behavior that suggests that they have considered ending their own life? And, in this regard, the Team should consider explicit questions, such as: "Has the individual who might pose a threat of violence been screened for suicide risk, including current and past thoughts of suicide, or history of suicide attempts"? or "Has the student reported suicidal thoughts, either current or past history?" Also, as a separate item, "Has the individual reported a history of self-injurious behaviors?" Note that, where the individual does present as a potential risk for suicide or self-harm on the basis of the Team's inquiry, referral to the Act 71 team for a formal assessment would be necessary.

SLIDE 63 – Investigative Themes used to Structure Information Gathering (Slide 3 of 4)

Investigative themes

Mental Health Disorders and Developmental Issues

- Does the individual have a diagnosed mental health disorder or developmental issue or exhibit behaviors that suggest they may have a mental health disorder or developmental issue?

Violence as an Option

- Do they see violence as an acceptable, desirable (only?) way to solve a problem?

Concerned Others

- Are other people concerned about the individual's potential for violence?



Mental Health Disorders and Developmental Issues

Does the individual have known mental health disorders or developmental issues or exhibit behaviors that suggest they may have mental health disorders or developmental issues?

While this investigative theme may overlap considerably with desperation and despair, it is useful to explore it separately as, while both will be keenly felt by the student of concern, we consider here mental health disorders and developmental issues to be those associated with disorders or issues that have been or present as likely to result in a specific clinical diagnosis, whereas desperation and despair are likely to be felt, to varying degrees, by anyone (and here the Trainer can ask the participant group to honestly say if they have never, at some point in their life, felt some level of depression, despair or hopelessness – it would be a rare person who has not).

Anxiety, depression, thoughts of suicide, and other mental health issues are important factors to consider when conducting an assessment. Keep in mind that individuals with mental health disorders or developmental issues might behave in a way that is maladaptive but might not be concerning or threatening because the behavior is a product of their diagnosis. Behaviors exhibited by an individual with a diagnosed disorder need to be evaluated in the context of that diagnosis and the student's known baseline of behavior. If they are experiencing feelings related to a diagnosable mental illness, such as clinically diagnosed depression, then the Team needs to consider the effect of these feelings on their behaviors when assessing the individual's risk of engaging in harm to self or others.

Sub-questions in this investigative theme might be:

- Does the individual have a known mental/behavioral health history that, in the context, may be indicative of escalated risk for violence, including self-harm?
- Have they previously attempted or communicated their intent to die of suicide or to harm others?

- Are those communications or behaviors that have been identified as concerning associated with an existing mental/behavioral health diagnosis, and so judged to be maladaptive, rather than threatening?

Violence as an Option

Does the individual see violence as an acceptable, desirable – or the only – way to solve a problem?

Some individuals, who are feeling hopeless and out of options, may think violence is the only way to solve a problem or settle a grievance. The Team should look to see whether the individual thinks violence is acceptable or necessary, if the student has used violence in the past to address problems, and whether they have thought of alternative ways to address the grievances. The Team should also assess whether peers, or others, support and encourage the individual to use violence as a means to an end.

Sub-questions in this investigative theme might be:

- Does the individual still perceive alternatives to violence to address their grievances?
- Does the setting around the individual who might pose a threat of violence (friends, colleagues, family members, others) explicitly or implicitly support or endorse violence as a way of resolving problems or disputes?
- Have they been "dared" by others to engage in an act of violence?
- Has the individual expressed sentiments of finality or desperation to address grievances?

A "yes" to this question increases concern about the individual and should also lead the Team to consider what options they may have for helping the individual begin to resolve their problems or improve their situation so that they no longer look toward violence as a solution.

Concerned Others

Are other people concerned about the individual's potential for violence?

In previous incidents, many individuals made statements or engaged in behaviors prior to their attacks that elicited concern from others in their lives. Assess whether caregivers, friends, classmates, teachers, or others who know a student are worried about them and whether they have taken any actions in response to their concerns. Gather information on the specific behaviors that caused worry or fear. These could include behaviors that may have elicited concerns about the safety of the student or others, such as unusual, bizarre or threatening statements; intimidating or aggressive acts; indications of planning for an attack; suicidal ideations or gestures; or a fixation on a specific target. Other behaviors that elicit concern may not necessarily be indicative of violence but do require that the Team assess the behavior and provide appropriate supports. Examples of these behaviors include alcohol or drug use; behavior changes related to academic performance, social habits, mood, or physical appearance; conflicts with others; and withdrawal or isolation.

Sub-questions in this investigative theme might be:

- Are those who know the student concerned that he or she might take action based on violent ideas or plans?
- Are those who know the student concerned about a specific target?
- Are persons around the student engaging in protective actions (e.g. distancing, avoiding, minimizing conflict, etc.)

The team should recognize that some people — such as caregivers, significant others, or anyone else who is very close with the individual — may not see the potential for violence even if others do. Those in close relationships with a person may be too close to the person/situation to admit violence is possible or even likely.

SLIDE 64 – Investigative Themes used to Structure Information Gathering (Slide 4 of 4)

Investigative themes

Planning and Capacity to Carry Out an Attack

- Does the student have the ability, intent and will to plan and carry out an attack?

Consistency

- Are the student's conversation and "story" consistent with his or her actions?

Protective Factors

- Does the student have a positive, trusting, sustained relationship with at least one responsible person?



Planning and Capacity to Carry Out an Attack

Does the individual who might pose a threat of violence have the ability, intent and will to plan and carry out an attack?

As we have covered before, targeted attacks at school are rarely sudden or impulsive acts of violence. The Team should assess whether the individual has made specific plans to harm the school or an individual, or themselves. The individual who might pose a threat of violence may create lists of individuals or groups targeted for violence, or research tactics and materials needed to carry out the attack. They may conduct surveillance, draw maps of the planned location, and test security responses at school. The individual might write out detailed steps and rehearse some aspects of a plan, such as getting to the school, the timing of the attack, or whether to attempt escape, be captured, or die of suicide. The individual may also acquire, manufacture, or practice with a weapon.

Determine whether the individual who might pose a threat of violence's thinking and behavior is organized enough to plan and execute an attack and whether they have the resources to carry it out. Planning does not need to be elaborate and could be as simple as taking a weapon from home and inflicting harm on classmates at school. Other attackers may develop more complex and lengthier plans. At the very least, carrying out an attack requires that the individual has access to a weapon and the ability to get that weapon to school undetected.

Sub-questions in this investigative theme might be:

- How organized is the individual's thinking and behavior?
- Are they trying to get the means to carry out an attack?

- Have they developed the will and ability to cause harm?
- Are they practicing or rehearsing for the violence?
- What is the “intensity of effort” expended in attempting to develop the capability?

Consistency

Are the individual's conversation and "story" consistent with his or her actions?

The Team should corroborate the individual who might pose a threat of violence's statements to determine that they are consistent with their actions and behaviors and with what other people say about them. When inconsistencies are identified, the Team should then try to determine why that is the case. For example, the student might say that they are handling a romantic break-up well, but posts on social media indicate they are struggling to move on, and friends report that they are more upset or angry about the break-up than reported. Determine whether the inconsistency is because the individual is deliberately hiding something or if the inconsistency stems from another underlying issue. The concealment may be as simple as a fear of facing punishment for some other inappropriate behavior, or it may be related to hidden plans for a violent act.

Sub-questions in this investigative theme might be:

- Does information from collateral interviews and from the student's own behavior confirm or dispute what they say is going on and how they are dealing with it?
- Is there corroboration across sources or are the individual's statements at odds with their actions?

Protective factors

Does the individual who might pose a threat of violence have a positive, trusting, sustained relationship with at least one responsible person?

A thorough Threat Assessment requires understanding the full picture of an individual's behaviors and environment, which also includes accounting for the positive and prosocial influences on their life. The Team should identify factors that may restore hope to an individual who feels defeated, desperate, or in a situation that is seemingly impossible to overcome. This includes determining whether the student has a positive, trusting relationship with an adult at school. This could be a teacher, coach, school counselor, administrator, nurse, School Security Personnel, or janitor. A trusted adult at school in whom the student can confide and who will listen without judgment can help direct them toward resources, supports, and options to overcome setbacks. Learn who the student's friends are at school and if they feel emotionally connected to others.

Positive situational or personal factors might help to deter someone from engaging in negative or harmful behaviors. Changes in an individual who might pose a threat of violence's life, such as having a new romantic relationship or becoming a member of a team or club, might discourage any plan to engage in violence. The Team could also use activities or groups the individual wants to take part in as motivation for the student to engage in positive and constructive behaviors, such as attending class, completing assignments, and adhering to a conduct or behavior code.

Sub-questions in this investigative theme might be:

- Does the student have at least one friend, colleague, family member, or other person that he or she trusts and can rely upon for support, guidance or assistance?

- Is that trusted person someone that would work collaboratively with the team for the well-being of the individual who might pose a threat of violence?
- Is the individual emotionally connected to other people or becoming more socially isolated?

Having someone that the student already trusts may be a protective factor in itself. This means that a responsible person may already be a good influence on the person. If the team decides that the individual poses a threat of harm, the team can solicit the help of this responsible person to assist in developing and implementing a management plan. The Team should monitor the status of the relationship in case it should fall apart, and then become a potential risk factor for escalation.

As a quick reference, protective factors include:

- Prosocial involvement.
- Healthy social supports.
- Strong attachments and bonds.
- Positive attitude towards intervention and authority.
- Strong commitment to school.
- Resilient personality traits.
- Positive coping mechanisms.

Group work and facilitated discussion

SLIDE 65 – Potential Sources of Information



Explain that, for this next part of the training, the participants will work in groups to explore the wide-ranging potential sources of information that might be considered in the Threat Assessment process. Each group (typically the participants at a table) will have approximately 5 minutes to list what sources of information are available to them or that they believe would be relevant to collect information from, and who would provide this information, and will then share with the larger group. When sharing back, the group should also describe any issues, based on their experience, that can complicate the process for gathering information from the identified source.

Activity set up: Large flipchart papers are placed on walls around the room (in advance) or distributed to the tables where participants are sat – one sheet per group and a marker pen. Each team then picks one or two sources to share to the group and the facilitator uses that as an opportunity to clarify or elaborate on relevant concepts, moving from group to group and exploring issues that are identified associated with each information source. Concepts to address during this facilitated discussion will include:

- That Team members should prioritize information sources and begin the assessment with those sources most likely to have the greatest information relevant to determining the validity and seriousness of the threat.
- That the time of day that a report of a potential threat is received will impact the amount of information that can be collected and reviewed in order to ensure that appropriate safety measures are taken to protect any potential targets. This supports encouraging teachers and others to report potential threats immediately to a school administrator.
- Given the breadth of information that will need to be gathered and reviewed, it is important that the Team have a clear understanding of their role and responsibility in the Threat Assessment process (specifically, what Threat Assessment deals with and what it does not) and that the responsibility for gathering information is shared among Team members.
- Gathering information from multiple sources ensures that the team can accurately assess the individual's risks and needs and provide appropriate interventions, supports and resources. Corroboration of information can be achieved by another source telling us the same thing. Triangulation can be used where several sources, collectively, point to the same thing or narrow a field of investigation (such as who a target might be).

Group work and facilitated discussion

SLIDE 66 – Potential Sources of Information – Facilitated Discussion Exercise Outputs

Sources of information

Background Information

- Recent and historical school or work performance history
- Prior TAT contact(s)
- Contact with law enforcement or security at school and in the community
- Student records

Other Sources of Information

- Information from the threat recipient, witnesses, target, student, caregivers, teachers and others who regularly interact with the individual
- Social media presence
- Internet usage / search history
- Criminal records
- Search of person, property, locker and/or desk
- Information from previous schools
- Information from community-based medical or mental health providers



The exercise should yield some or all of the following:

- Background information:
 - Recent and historical school or work performance history.
 - Prior Threat Assessment Team contact(s).
 - Contact with law enforcement or security at school and in the community.
 - Student Records:
 - Attendance records.
 - Disciplinary records.

- Achievement and test data.
- SAP referral records/SAP files.
- Health records, including school nurse records.
- Reports of assessments for eligibility for special education services and IEP or Section 504 Plan.
- Other sources of information:
 - Information from the recipient of the threat, any witnesses, the target of the threat and the individual who might pose a threat of violence themselves.
 - Social media presence.
 - Internet usage/search history (on school devices or networks).
 - Search of person, property, locker, vehicle on school grounds and/or desk following school policies and protocols.
 - Information from previous schools.
 - Open-source criminal records.
 - Information from teachers and others who regularly interact with the individual.
 - Information from caregivers.
 - Information from community-based medical or mental health providers.

Instructor-led presentation with maximized participant engagement

SLIDE 67 – Access to Health Records and Behavioral History (Slide 1 of 4)

Access to health records and behavioral history

- Upon a preliminary determination a student's behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others ... to facilitate the timely assessment of, and intervention, a Team **shall** (Art. XIII-E § 1302-E (d)) have access to the following student information **to the extent permissible under State and Federal law**:
 - Student health records
 - Prior school disciplinary records
 - Records or information relating to court adjudication (through juvenile probation)
 - Records of any prior behavioral or mental health or psychological evaluations or screenings **maintained by the school entity**
 - 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 entity, e.g., SAP referrals



Explain that Threat Assessment Teams, upon a preliminary determination that a student's behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others ... and to facilitate timely assessment and intervention, **shall** have access to the following student information²⁴ **to the extent permissible under State and Federal law**:

- Student health records.

²⁴ Article XIII-E, Threat Assessment (Art. added June 28, 2019, P.L.146, No.18); § 1302-E (d). Threat Assessment Teams, Access to Student Information.

- Prior school disciplinary records.
- Records or information shared with the school entity under Article XIII-A and 42 Pa.C.S. § 6341(b.1) relating to court adjudication – typically provided through the juvenile probation service.
- Records of any prior behavioral or mental health or psychological evaluations or screenings **maintained by the school entity**.
- 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 entity**, e.g., SAP referrals.

Instructor-led presentation with maximized participant engagement

SLIDE 68 – Access to Health Records and Behavioral History (Slide 2 of 4)

Access to health records and criminal history

- There is a general principle that where school entities request information from county agencies / juvenile probation service, those recipients shall comply...
- ...However, there are constraints on access, associated with:
 - 42 Pa.C.S. § 5944 relating to confidential communications to psychiatrists or licensed psychologists
 - The Family Educational Rights and Privacy Act (FERPA)
 - Individuals with Disabilities Education Act (IDEA)
 - Health Insurance Portability and Accountability Act (HIPAA)
 - DHHS prohibitions and limitations relating to the confidentiality of drug and alcohol treatment records
- in many cases however, there are exemptions associated with cases where there is an assessed threat to life or other emergency



Examine how 42 Pa.C.S. § 6352.2 dealing with interagency information sharing sets out the **general principle** that, where a school agency requests certain information, county agencies and the juvenile probation service shall comply with requests for information. However, there are constraints on unfettered access, associated with:

- 42 Pa.C.S. § 5944 relating to confidential communications to psychiatrists or licensed psychologists.
- The Family Educational Rights and Privacy Act (FERPA).
- Individuals with Disabilities Education Act (IDEA).
- Health Insurance Portability and Accountability Act (HIPAA).
- DHHS prohibitions and limitations relating to the confidentiality of drug and alcohol treatment records.

Explain that, in many cases however, there are exemptions to the constraints provided in these laws associated with cases where there is an assessed threat to life or other salient emergency, and that the training will look at these in due course.

Instructor-led presentation with maximized participant engagement

SLIDE 69 – Access to Health Records and Behavioral History (Slide 3 of 4)

Access to health records and behavioral history

- Any information gained from health records or behavioral records is to enable the Team to fulfil its duty to:
 - *Evaluate a threat or the recommended disposition of a threat...*
 - *...and, no member of a team may redisclose any record or information obtained [through exercise of their Code-mandated authority] or otherwise use any record of a student beyond the purpose for which the disclosure was made to the team*
- Documentation maintained by the TAT is not subject to PA Right To Know Law

 *How can obstacles to gaining allowable access to behavioral and mental health records and criminal history be overcome?*



It will be important to explain to the participants that, in accordance with state law²⁵: Any information gained from behavioral history or from health records is to enable the Team to fulfil its duty to, "*... evaluate a threat or the recommended disposition of a threat*". And that, "*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.*"

Note also that, the documentation maintained by the Threat Assessment Team is not subject to Pennsylvania's Right-to-Know Law.

Pose the question: *How can obstacles to gaining allowable access to behavioral and mental health records and criminal history be overcome?*

Elicit responses from the participant group that include through:

- Threat Assessment Teams having an accurate understanding of what is allowable and under what circumstances.
- Threat Assessment Teams having an accurate understanding of what records are maintained by the school entity, including by school security personnel, and the protocols for accessing those records in a health or safety emergency.
- Identifying who within schools' administration teams and at district (and potentially IU) are the right people to act as the liaison or 'requestor' in relation to particular types of record.
- Establishing positive, collegial relationships with law enforcement and criminal justice/courts services, and with community mental health services²⁶.

²⁵ Section 1302-E (f). Threat Assessment Teams - Use of information or records

²⁶ Community mental and behavioral health services that work with school entities regularly as part of SAP programs or trauma-informed approach supports should have a memorandum of understanding or agreement with the school entity for services, which includes addressing recordkeeping and access to records in a health and safety emergency.

- Ensuring the ability to quickly access legal advice on information sharing/disclosure/re-disclosure to ensure more complex issues can be dealt with quickly.

Instructor-led presentation with maximized participant engagement

SLIDE 70 – Access to Health Records and Behavioral History (Slide 4 of 4)

Access to health records and behavioral history

- Information is gathered in collaboration with the school entity's safety and security office, or other central office level staff, with legal advice / oversight where relevant
- Simplest option: Obtain permission from caregivers for records to be disclosed
- If not practical / getting results: Consider (with legal advice) whether Tarasoff Rule applies
- Tarasoff obligates mental health providers to use ***reasonable care to protect the victim of a threat of violence***



Where a Threat Assessment Team believes it is important to communicate with a community-based medical or mental health provider, the easiest way to do so is to obtain permission from the caregiver (in the case of a student).²⁷

Ensure that the participants understand that there is nothing in the law that **requires** record holders to disclose such records (or information from them) to Threat Assessment Team members. It simply **allows** such disclosure. Establishing Memoranda of Understanding or other relationships with community-based service providers to enable appropriate information sharing to be achieved with the speed and proactivity often required in Threat Assessment cases is recommended. And the same is true for law enforcement in the case of criminal records, where Memoranda of Understanding will help in overcoming the fact that there is no legal obligation for law enforcement to provide access to criminal records to the Threat Assessment Team.

If, for whatever reason, that is not possible or practical, the Team can consider (with legal advice) whether the Tarasoff Rule applies. The Tarasoff Rule **obligates mental health service providers to use reasonable care to protect the victim of a threat of violence**. See also 55 PA Code²⁸.

Note that, per 42 Pa.C.S. § 5944, this would need to be a voluntary act on the part of the mental health service provider as, *No [psychiatrist or licensed psychologist] shall be, without the written consent of [their]*

²⁷ 55 Pa. Code § 5100.34. Consensual release to third parties

²⁸ 55 Pa. Code § 5100.32. Nonconsensual release of information. In the Notes of Decisions (Release of Information in Response to Medical Emergency), the Code notes, *Regulations which provide for the nonconsensual release of confidential information when release is necessary to prevent harm or death in response to medical emergency may include situations wherein a psychiatric patient's threats to harm a third party are disclosed*. Ms. B. v. Montgomery County Emergency Service, 799 F.Supp. 534 (E.D. Pa. 1992), affirmed, 989 F.2d 488 (3d Cir. Pa. 1993); cert. denied, 510 U.S. 860, 126 L. Ed. 2d 133, 114 S. Ct. 174 (U. S. 1993).

client, examined in any civil or criminal matter as to any information acquired in the course of [their] professional services in behalf of such client. The confidential relations and communications between a psychologist or psychiatrist and [their] client shall be on the same basis as those provided or prescribed by law between an attorney and client.

This overarching obligation (Duty to Protect Third Parties) on mental health service providers may be satisfied by:

1. Seeking involuntary admission of their client under applicable Pennsylvania law.
2. Making reasonable attempts to warn the potential victims or the caregiver of the potential victim if the potential victim is under the age of 18.
3. Making reasonable efforts to notify a law enforcement official having jurisdiction in the mental health service provider's client's (or potential victim's) place of residence or place of work, or place of work of the caregiver if the potential victim is under age 18, or both.
4. Taking steps reasonably available to the mental health service provider to prevent their client from using physical violence or other means of harm to others until the appropriate law enforcement agency can be summoned and take custody of the client.
5. Providing therapy or counseling to their client or patient in the session in which the threat has been communicated until the mental health service provider reasonably believes that the client no longer has the intent or the ability to carry out the threat.

In situations where the Team believes that the individual poses a very serious risk of violence, they can communicate those concerns and the basis for those concerns with the community-based provider, with the awareness and acknowledgement that they are **not asking for what the provider may consider privileged information** in return, **but are sharing** information with the **provider in order to inform them of the seriousness of the concerns**. The information provided may, in fact, trigger the Tarasoff Rule for them in the event they have awareness of information that support the findings of the Team or otherwise contribute to an increased level of concern.

Emphasize that **schools may not store any criminal history information (regarding juveniles) within school records** or they would be in violation of other state laws.

In practice, information held in criminal and medical records would be collected, as relevant, in collaboration with the School Police or School Resource Officer (or other law enforcement partners), the relevant safety and security office, or other central office level staff. Threat Assessment Teams, if at all unsure, should seek advice from the school entity's solicitor.

One issue that continues to cause some confusion in Pennsylvania is the access to mental health records for 14 to 17-year-old students due to the changing laws in Pennsylvania. The issue is summarized here should participants query trainers.²⁹

Prior to 2004, the Mental Health Procedures Act (MHPA) governed both the age of consent (defined as age 14) to voluntary inpatient treatment as well as the rules around confidentiality and the release of information for both inpatient and outpatient treatment (voluntary or involuntary).

²⁹ Sherry L. Peters MSW, ACSW, 2020

The MHPA was silent about the age of consent for outpatient treatment but school entities mostly believed that when students reached the age of 14, they could refuse mental health treatment (either outpatient or inpatient) even if their caregivers were seeking treatment for them, creating frustration on the part of both caregivers and educators.

In 2004, Act 147 was passed to address both the issue of caregivers seeking treatment for their 14 to 17-year-old children as well as who would then control the records of the subsequent treatment. [Act 65](#) of 2020 provided an update to Act 147 and clarified the language around consent, inpatient treatment, and appeals for revocation or modification of services. This law made it possible for the caregivers to consent to voluntary outpatient and inpatient treatment on behalf of their 14 to 17-year-old. The law did not take away the 14 to 17-year-old student's ability to consent to treatment but it did say that neither the parent nor the student could abrogate the consent provided by the other. The law clearly stated that the individual who consented for the treatment would control the release of the records. When caregivers consented to the treatment, they would have the ability to release the records to other mental health treatment providers or to the primary care physician³⁰ directly from the treating mental health provider. The caregivers would be entitled to certain information such as diagnosis, treatment recommendations, medication, or other important information for the care of their child but they would not be entitled to the actual record.

Although Act 147 created the ability for caregivers to actively seek treatment for their 14 to 17-year-olds, consent to that treatment, and then consent to the release of information, many school entities continue to believe that once students reach age 14, they can refuse mental health treatment. In fact, many caregivers continue to believe this. It is true that the law did not address any special measures to ensure the student would actually participate or even attend the appointment, but the law did stipulate that the student could not refuse treatment if the parent consented.

The issue of a school entity getting access to the mental health treatment record of the 14 to 17-year-old may be further complicated by the law stating to whom the record could be disclosed (mental health treatment providers and primary care physicians). This may limit the ability of a school entity to have access to the record except in circumstances where there could be exceptions due to threat of harm.

Some of the confusion surrounding the issue of 14 to 17-year-old's mental health records may actually increase as more and more schools become aware of Act 147 as well as the new law, Act 65 of 2020 signed by Governor Wolf in July that supercedes Act 147. This 2020 law seems to be substantially the same as the 2004 law with what appears to be an attempt at strengthening the language around the caregivers' right to consent.

³⁰ Note that it is only the minor (subject of the records) who can release information to others. Parents/legal guardians only have the authority to release the records to other mental health treatment providers or to the primary care physician.

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SLIDE 71 – Obligations under the Family Educational Rights and Privacy Act (FERPA) (Slide 1 of 2)

Obligations under Family Educational Rights and Privacy Act [FERPA]

- *Does not apply to oral communication* between educators and others concerning information or knowledge *that does not rely on the education record*
- *Does not stop a school official from disclosing information* about a student *if the information is obtained through the school official's personal knowledge or observation*, and *not from the student's education records*
- *May not apply to images* of students captured on CCTV or other security cameras maintained by the school's '**Law Enforcement Unit**' [LEU]. In many cases, FERPA will not apply, but consultation with your solicitor is advised in relation to the specific context presented by your school entity



It is worth dwelling in a little more detail on FERPA, as this is frequently relevant to Threat Assessment cases.

Explain that it is the Family Educational Rights and Privacy Act (FERPA) that is the primary law that governs the privacy of educational records. FERPA was enacted to provide caregivers access to education records and to limit disclosure of records without their consent (or the student's consent if age 18). It is important to understand that FERPA:

- Is a "hard copy law" focusing on ways that personally identifiable information in the **education record** (of a given student) is used.
- Does not apply to oral communication between educators and others concerning information or knowledge that does not rely on the education record.
- May not apply to images of students captured on CCTV or other security cameras maintained by the school's 'Law Enforcement Unit' (we will come back to that term later). School entities should consult their school solicitor on whether recordings maintained by a school entity are subject to FERPA in view of the specific circumstances of the recordings.
- Does not prohibit a school official from disclosing information about a student if the information is obtained through the school official's personal knowledge or observation, and not from the student's education records. For example, if a teacher overhears a student making threatening remarks to other students, FERPA does not protect that information, and the teacher may disclose what they overheard to appropriate authorities.

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SLIDE 72 – Obligations under the Family Educational Rights and Privacy Act (FERPA) (Slide 2 of 2)

Obligations under Family Educational Rights and Privacy Act [FERPA]

- LEU: Police officers or security staff employed or authorized by the school to monitor safety and security in and around school premises, or specifically designated school officials responsible for referring potential or alleged violations of law to local police authorities
- Investigative reports / other records created and maintained by LEU **are not considered subject to FERPA**
- These **can be disclosed**, including to outside LE, **without the consent of caregivers**

Education Record Disclosure exceptions under FERPA:

- In an emergency, school officials are permitted to disclose education records without consent to protect the health or safety of students or other individuals



Law enforcement units and school security records:

In the context of FERPA, the term 'law enforcement unit' refers to police officers or security staff employed or authorized by the school to monitor safety and security in and around school premises, or specifically designated school officials responsible for referring potential or alleged violations of law to local police authorities³¹. And, under FERPA, investigative reports and other records created and maintained by these 'law enforcement units' are not considered subject to FERPA, as they are not considered to be 'education records', and therefore can be disclosed, including to outside law enforcement authorities, without parental consent. While a school has flexibility in deciding how to carry out safety functions, it must also indicate to caregivers in its school policy or annual notification provided to caregivers which office or school official serves as the school's 'law enforcement unit'. It must also indicate whether School Resource Officers or school police have been designated as 'school officials' with legitimate educational interest and access to personally identifiable information in education records maintained by the school entity.

Disclosure exceptions under FERPA

Explain that, ***in an emergency, FERPA does permit school officials to disclose without consent education records***, including personally identifiable information from those records, ***to protect the health or safety of students or other individuals***. At such times, records and information may be released to appropriate parties such as law enforcement officials, public health officials, and trained medical personnel.

When a school entity makes a disclosure under the health or safety exception of FERPA, it 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. (34 CFR 99.32(a)).

³¹ 34 CFR 99.8; *What provisions apply to records of a law enforcement unit?*

This is also probably the most relevant point in the training to discuss the sharing of information between schools and between schools and Higher Education Institutions if this has not already come up.

Explain that, as part of the Records Check undertaken during Intake and Triage, the Team would review any Transfer Records, where a student had transferred in. Transfer Records will vary in their scope according to state law but will, as a minimum, and certainly where the student has transferred within Pennsylvania, contain records of any expulsion or suspension and the circumstances associated with that, as well as the discipline record and any IEP or 504 Plan. Where additional information is sought and relates to an articulable threat, under FERPA, the school from where the student transferred would be able to disclose the Threat Assessment case record.

And, of course, this works both ways, and Threat Assessment Teams should be prepared to speak with counterparts in other schools where a former student has transferred to, or where a student receives education or services part-time (such as at an Intermediate Unit program or Career and Technical Center).

When a student who is an individual assessed to pose a risk for violence is preparing to transfer to another school, Threat Assessment Teams can and do have a responsibility to share information with their counterpart Team at the receiving school. It is recommended that a conversation is initiated first from one team member to the other, for example counselor to counselor, administrator to administrator, etc, prior to sending any records over. This would also apply where the student is moving on to a Higher Education Institution, where typically the transcript generated by a school might only provide summarized records of any expulsion or suspensions, but little else other than their grades and academic record.

In practical terms, this information sharing would generally start with a phone call between Threat Assessment Team members. This is another reason why having the Principal formally listed as a Threat Assessment Team member (usually as a backup member) is a good thing as, in many cases – and particularly where the student was associated with a high level of concern case, it would be Principal of school A calling Principal of school B to share the information about a student of concern transferring in. It is in those types of conversations where pertinent information is shared and at that point, can be decided upon what documentation school A would then send school B. Information shared could be the full documented Threat Assessment or a written case summary, although – and this is important to make clear – with **redacted information about other students, witnesses, etc.**

Note also there is a FERPA disclosure exemption associated with ***Disciplinary Action for Conduct that Posed a Significant Risk***. Information from the educational record may be disclosed to teachers and school officials in other schools who have legitimate educational interests in the behavior of a student when the information concerns disciplinary action taken against the student for conduct that posed a significant risk to the safety or well-being of that student, other students, or other members of the school community.

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SLIDE 73 – FERPA’s Relationship with Health Insurance Portability and Accountability Act (HIPAA)

FERPA’s Relationship with Health Insurance Portability and Accountability Act [HIPAA]

DOE & DHHS guidance on relationship between FERPA and the HIPAA Privacy Rule:

Disclosures to Prevent a Serious and Imminent Threat: Health care providers may share PHI with anyone as necessary to prevent or lessen a serious and imminent threat to the health or safety of the individual, another person, or the public ... This permission includes the sharing of psychotherapy notes, which otherwise receive special protection under the [HIPAA] Privacy Rule.

Thus, without a patient’s authorization or agreement, health care providers may disclose a patient’s health information to anyone who is in a position to prevent or lessen the threatened harm, including family, friends, caregivers, and law enforcement.



[DOE & DHHS Guidance on Application of FERPA and HIPAA to Student Health Records](#)

The relationship of FERPA and HIPAA can seem confusing and, while it will only be of relevance in specific situations where schools are also HIPAA covered entities, a sound background knowledge of the salient facts related to disclosure of treatment records/Protected Health Information (PHI) under FERPA and HIPAA will be important. This will also enable you as the Facilitator to deal with questioning that mistakenly assumes HIPAA has application in settings where it does not. Much of this section here is provided as background that will enable you to explain the DOE/DHHS guidance provided on the slide.

Explain that HIPAA is designed to protect the privacy and security of Protected Health Information (PHI). The security dimension of HIPAA is not specifically relevant to Threat Assessment and Management, but the Privacy rule can be. It is therefore worth knowing the following:

HIPAA’s **Privacy Rule does not apply in most schools** as they are either: Not a HIPAA covered entity, or are a HIPAA covered entity but maintains health information only on students in records that are “education records” under FERPA and, therefore, not PHI covered by the HIPAA Privacy Rule (a useful summary of this can be viewed in the HIPAA Journal: [Does HIPAA Apply to Schools](#)).

Schools that provide healthcare services to students **and** conduct transactions electronically³² are likely to be HIPAA covered entities and maintain medical treatment records on those students. The HIPAA Privacy Rule specifically excludes from the definition of PHI both student treatment records and education records protected by FERPA. Under FERPA, medical and psychological treatment records of students are excluded from the definition of “education records” if they are **made, maintained, and used only in connection with treatment of the student and disclosed only to those medical professionals providing the treatment.** These records are commonly called “treatment records.”

While “treatment records” are excluded from the definition of education records under FERPA, **if a student’s treatment records are used for any purpose other than the student’s treatment**, or if a school

³² Specifically, some schools employ a healthcare provider that conducts transactions electronically for which the Department of Health and Human Services has adopted standards. In this case, the school would be classed as a HIPAA covered entity.

wishes to disclose the treatment records for any purpose other than the student's treatment, ***they may only be disclosed as education records subject to FERPA requirements***. Therefore, a student's treatment records may be disclosed to any party, without consent, as long as the disclosure meets one of the exceptions to FERPA's general consent rule. So, treatment records on eligible students may be disclosed without consent to appropriate parties if the disclosure is in connection with a health or safety emergency (such as where a Threat Assessment Team make a preliminary determination that there is a risk of intended violence), as well as to comply with a judicial order or lawfully issued subpoena, or any other pertinent exception to FERPA's consent requirement. Consider this from the DOE and the Department of Health and Human Services have issued joint guidance that explains the relationship between FERPA and the HIPAA Privacy Rule:

Disclosures to Prevent a Serious and Imminent Threat: *Health care providers may share PHI with anyone as necessary to prevent or lessen a serious and imminent threat to the health or safety of the individual, another person, or the public – consistent with applicable law (such as State statutes, regulations, or case law) and the provider's standards of ethical conduct. This permission includes the sharing of psychotherapy notes, which otherwise receive special protection under the Privacy Rule. Thus, without a patient's authorization or agreement, health care providers may disclose a patient's health information to anyone who is in a position to prevent or lessen the threatened harm, including family, friends, caregivers, and law enforcement. The HIPAA Privacy Rule expressly presumes the good faith of health care providers in their determination of the nature and severity of the threat to health or safety and the need to disclose information.*

The joint guidance addresses many of the questions raised by school administrators, health care professionals, and others as to how these two laws apply to records maintained on students. It also addresses certain disclosures that are allowed without consent or authorization under both laws, especially those related to health and safety emergency situations.



[DOE & DHHS Guidance on Application of FERPA and HIPAA to Student Health Records](#)

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SLIDE 74 – Responding to the Initial Report of a Potential Threat

Response to a reported threat

- Use a standardized protocol for gathering information and for interviewing:
 - Who will interview students who might pose a risk for violence?
 - Who will talk to classmates, teachers, or caregivers?
 - How will information gained through interviews be documented?



Throughout this section, the Trainer should keep a **large format version of the Threat Assessment process flowchart** available and visible, and continuously indicate to participants where different activities will happen, noting that there will always be local and contextual variation dependent on the nature and immediacy of the threat.

Teams should use a standardized protocol for gathering information and for interviewing witnesses, teachers and the individual who might pose a threat of violence and should establish procedures that account for the following:

- Who will interview individuals who might pose a threat of violence?
- Who will talk to classmates, teachers, or caregivers?
- How will information gained through interviews be documented?

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SLIDE 75 – Initial Interviews to Verify a Reported Threat (Slide 1 of 2)

Response to a reported threat: Initial interviews to verify a reported threat

- Where threat is not imminent, circumstance will help determine who and when to interview
- Student who might pose a threat of violence may be among the last to be interviewed
- Goal of initial interviews: Evaluate the potential threat in context and consider:
 - Student's explanation of the threat's meaning
 - Perceptions of the threat's meaning by the target / witnesses
- Record an interviewee's exact words
- Initial interviews should begin with open ended questions
- Ask witnesses and potential targets about their perceptions, feelings and interpretation of the student's communication or behavior
- Ask the student about their statements / behavior



When the threat is not imminent, circumstance will help the team determine who and when to engage in the interviewing process. In some instances, the individual who might pose a threat of violence may be among the last people to be interviewed.

The goal of the initial interviews is to evaluate the potential threat in context and consider the individual's explanation of the threat's meaning as well as the perceptions of the threat's meaning by the target and any witnesses. In conducting interviews, it is important to record the person's exact words, using quotation marks to indicate direct quotes.

The following individuals should be included in the initial fact-finding.

- Person(s) reporting threat.
- Person(s) receiving report of threat.
- Recipient(s) of threat.
- Witness(es).
- Individual who made the threat or was identified to have made concerning communications or behaved in a manner that was concerning.

The initial interview, whether a witness, target or individual of concern, should begin with open ended questions such as, "Do you know why I wanted to talk with you?" or "Tell me what happened today when you were (place of incident)?" before moving to more specific questions.

Witnesses and potential targets should be asked directly about their perceptions, feelings and interpretation of the individual's threatening communication or behavior.

- What do they think the individual meant by what they said or did?
- Can they identify a reason behind the individual's statement or behavior?
- How do they feel about what the individual said or did?
- What do they think the individual will do next?

- How are they going to respond to the situation?

Similarly, the individual who might pose a threat of violence should be asked directly about their statements and or behavior to gain an understanding of the context in which their behavior occurred, their intentions and motivations, their understanding of the impact of their behavior on others and their future plans.

- What did you mean when you said or did that?
- How do you think (person who was threatened) feels about what you said or did?
- What was the reason you said or did that?
- What are you going to do now?

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SLIDE 76 – Initial Interviews to Verify a Reported Threat (Slide 2 of 2)

Response to a reported threat: Initial interviews to verify a reported threat

- Initial information gathering should include developing an understanding of the motivation of the *individual who initially reported the threat*
- This includes an understanding of the *relationship between the reporter and the individual of concern*
- The possibility that reports may be made for malicious / spurious reasons must be considered as a possibility and ruled out as part of TA
- In questioning the student, you are trying to gain an understanding of the context in which their behavior occurred, their intentions and motivations, their understanding of the impact of their behavior on others and their future plans



The initial information gathering should include developing an understanding of the motivation of the individual who initially reported the threat which, in the case where a specific individual of concern is identified, would include an understanding of the relationship between the reporter and the individual of concern. The possibility that reports may be made for reasons other than true concern – to get someone in trouble with administration or to cause disruption to the school community - must be considered as a possibility and ruled out as part of the threat assessment process.

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SLIDES 77-79 – Intake, Initial Inquiry and Triage

Intake and Initial Inquiry

- Extent of information gathering undertaken impacted by the level of concern presented by the individual and / or the situation
- The initial information gathered is reviewed by a subset of the full Team. Goal: To determine *whether the threat can be quickly and easily resolved and whether existing resources and mechanisms are sufficient to address those concerns*
- The Intake and Initial Inquiry step also answers the critical question: *Is there an imminent or direct threat posed by the subject / situation?*
- If yes, immediate protective actions need to be taken and, dependent on the nature of the concern, notification to Law Enforcement
- Crisis response procedures (school entity's EOP) would be initiated and the TA 'paused'
- Once safety of student, target and environment are established, TAT can reconvene



The breadth of information gathering undertaken by the Team will be impacted by the level of concern presented by the individual and/or the situation. The initial information gathered is reviewed, *often by a subset of the full Team*, to determine whether the threat can be quickly and easily resolved and whether existing resources and mechanisms are sufficient to address those concerns. This occurs during the first stage of Threat Assessment and Management: **Intake and Initial Inquiry**. The Intake and Initial Inquiry step also answers the critical question: *Is there an imminent or direct threat posed by the student/situation?* If that is the case, immediate protective actions need to be taken and, dependent on the nature of the concern, notification to Law Enforcement.

An imminent threat is indicated by such factors as the individual:

- Having a weapon in the school, on a school bus, at a school activity, or *en route* to/from any of those.
- Having conveyed imminent intent to use a weapon or cause serious injury, including to themselves.
- Having access to and/or possession of weapons.
- Attempting to breach security or to gain access to targets.
- Communicating or displaying a lack of inhibitions for using violence or harming themselves.

If the situation is imminent, those conducting this Intake and Initial Inquiry would initiate crisis response procedures within the school entity's Emergency Operations Plan, including notifying and involving law enforcement and appropriate security personnel, initiating relevant security protocols to protect the target, wider school community and others, including containing the individual. This, effectively, postpones the Threat Assessment, and the Threat Assessment Team would reconvene the process once the individual who might pose a threat, target and environment are made safe. At this point, the Team can move on to the Triage and Assessment steps to further resolve any ongoing threat posed.

Intake and Initial Inquiry > Triage

- Now the scope of the TA broadens to include more people and more information to develop a holistic view of the subject / situation
- Triage will more fully develop lines of inquiry using STEP® as a framework, whether undertaken once actions to mitigate an imminent threat have been taken, or carried out where the Intake and Initial Inquiry step determined there was no imminent threat
- To perform triage, readily accessible information is gathered: interviews, records checks
- At the conclusion of Triage step:
 - If it cannot be determined with a reasonable degree of confidence that the subject of concern is **no threat or presents only a low level of concern**, a full **Inquiry** is undertaken by the full TAT and the subject / situation of concern are determined to pose a **Substantive Threat**
 - If Triage determines no threat / low level of concern (**Transient Threat**), case is either documented and closed or referrals / other supports to address remaining concerns occur



Triage – whether undertaken once actions to mitigate an imminent threat have been taken, or carried out where the Intake and Initial Inquiry step determined there was no imminent threat – will then more fully develop lines of inquiry using STEP® as a framework, gathering information from interviews, records checks and other information readily available to the Team. An important aspect of triage is that suicide risk screening should occur at this stage as, as we have explored earlier in the training, a high proportion of those posing a threat of violence to others are often also at risk for suicide. Suicide risk screening must only be performed by Team members qualified to do so.

At the conclusion of the Triage step, if it cannot be determined with a reasonable degree of confidence that the individual is no threat or presents only a low level of concern – termed a **Transient Threat** – then a **Full Inquiry** is undertaken by the Threat Assessment Team as the individual/situation of concern have been determined to pose a **Substantive Threat**. See **Appendix 2** for summary guidance on threat classification.

Intake and Initial Inquiry > Triage

- A third determination is also possible
- That the individual **poses no threat to others but does pose a threat to self**
- These cases will be rare
- If the TAT observe warning signs or risk factors for suicide risk, but no indicators of a threat to others:
 - Student should be immediately referred to the Act 71 team / Crisis Response Team
 - The TA case would be closed
 - If the Act 71 team / Crisis Response Team subsequently identify potential for threat to others, the student would be referred back into the TA process



A third determination – other than a Substantive or Transient Threat – is also possible, and this is that the individual **poses no threat to others but does pose a threat to self**. These cases will be rare as, in most

cases, individuals at risk for suicide but posing no risk to others will have been identified and inducted into the established Act 71 pathways that exist in the school entity. If, however, it is the Threat Assessment Team that observe warning signs or risk factors for suicide risk, but no indicators of a threat to others, the student should be immediately referred to the school entity's Act 71 pathway or Crisis Response Team as appropriate. Should those teams then subsequently identify potential for threat to others, the student would be referred back into the Threat Assessment process but, unless that occurs (at which point it would be a new case), there is no further action, and the case can be closed.

The full Inquiry is used to determine the level of concern and to develop strategies to prevent violence and reduce risk. In this case, additional information will be collected and reviewed by the full Team if they have not already been mobilized.

It is at this stage that the scope of the Threat Assessment broadens to include more people and more information to develop a holistic view of the individual who might pose a threat of violence and the wider situation. It is through this holistic lens that the Team will most effectively be able to devise an appropriate management plan to move the individual away from violence.

Additional information is gathered from individuals familiar with the individual and, where that individual is a student, a mental health interview is conducted by a school mental health professional who, dependent on the local protocol developed with the Act 71 team, may also be the individual who conducts suicide risk screening or assessment.

Note that, where no threat or a low level of concern is determined via the Triage step, in many cases, the case can be documented and closed. However, there may be other concerns which, while not the role of the Team to examine further, may require:

- Referral, such as to SAP, or for mental health evaluation, a review of an existing IEP or Section 504 Plan, etc.
- Safety or re-entry planning (dependent on the specific context the case was related to), the development of resilience planning strategies, etc.

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SLIDE 8o – Follow-up after Triage: Focus of Interviews

Follow-up after triage: Focus of interviews

What should interviews with the following focus on:

- Teachers / other school staff?
- Classmates or other peers?
- Caregivers?
- The student who might pose a threat of violence?

*Full corroboration of information across these sources will be powerful in helping to assess the level and nature of the threat...
...but what might significant differences in the information provided by these sources reveal?*



Pose the questions: What should interviews with the following individuals focus on:

- Teachers/other school staff?
- Classmates or other peers?
- Caregivers?
- The individual who might pose a threat of violence?

Facilitate responses from the group and lead the participants to an understanding (as set out below) that interviews with these different individuals can yield a significant amount of information upon which the assessment of the nature and level of the threat can be made.

Teacher/Staff Interview: Teachers and other school staff can provide information in the following areas, and those conducting the interview should be conscious of constructing the interview to eliminate any implicit bias and also to be watchful for responses from the interviewee that could be associated with, for instance, assumptions arising from stereotypes or implicit biases:

- Their knowledge of the threat and perspective on it.
- Student's academic performance and communication skills.
- Problems in the student's life.
- Peer relationships.
- Student mood historically and current: Expressions of hopelessness, helplessness or despair?
- Student's conduct and response to correction.
- Has this student done anything that expresses anger or aggression, or has an aggressive theme in written assignments, drawings, class projects, etc.?
- Student's involvement in clubs, sports or extracurricular activities, including any recent changes.
- Teacher's relationship with caregivers.

Classmates or other peers: Classmates or other peers such as members of clubs or societies can provide information in the following areas:

- Their knowledge of the threat and perspective on it.
- Problems in the individual's life.
- Peer relationships.
- The mood historically and current of the student of concern: Expressions of hopelessness, helplessness or despair?
- Has the individual done anything that expresses anger or aggression, or has an aggressive theme in written assignments, drawings, class projects, etc.?

Caregiver: In general, the caregivers of a student who is of concern should be asked about their knowledge of the threat and their interpretation of its meaning. In addition, they can be asked for information in the following areas:

- Relationship of the student who might pose a threat of violence and the target(s).
- How they plan to respond to the situation.
- Student's school history (academics, discipline, relationships with teacher, extracurricular involvement, etc.).
- Family relationships and stressors.
- Peer relations and stressors.
- Presence of delinquent behavior.
- Coping and anger management skills.
- Access to and experience with weapons.
- Exposure to violence.
- Student's current and historical mental health and any history of trauma, to include history of suicidal thoughts and behaviors, involvement with community agencies, medication, hospitalizations.

Threat Assessment team members will, of course, recognize that not all caregivers may be willing or able to cooperate with the interview process or feel comfortable speaking with school staff. Care should be taken to work with school staff who have the most familiarity with caregivers in setting up interviews and to address language or disability barriers.

individual who might pose a threat of violence: The goal of the interview with the student who poses a risk for violence is to identify immediate needs and inform a threat management plan. Topics should include the following areas:

- Review of the threat.
- Relationship with intended victim(s).
- School history (academics, discipline, relationships with teacher, extracurricular involvement, etc.).
- Family relationships and stressors.
- Exposure to violence.
- Peer relations and stressors such as bullying.
- Presence of delinquent behavior.
- History or current relationship with alcohol or drugs.
- Their mood, mental health challenges or history.

- Access to and experience with weapons.
- Coping and anger management skills.
- Orientation towards the future.
- Current involvement in extracurricular activities.
- Ideas of how the problem that led to the situation could be helped.

Pose the question: What might significant differences in the information provided by these sources reveal?

Facilitate the discussion within the participants that arrives at the following conclusion: While full corroboration of information across these sources will be powerful in helping to accurately assess the level of the threat, so will significant differences. For instance, where caregivers are saying one thing and, in interview with the school mental health professional, the individual who might pose a threat of violence is saying something diametrically different, understanding what is at the heart of these different views will be important and potentially instructive in helping objectively determine whether and what threat is present.

Videos and facilitated discussion

SLIDE 81 – Gathering Information | Video 1 Continued...



Ask the participants to watch the series of short video vignettes which pick up from where some of the earlier videos ended, and reflect on what they are seeing in the context of information gathering: what information could be gathered; from whom; what obstacles or issues might be encountered; what does the information they can see being revealed to them in the videos tell them about the nature and level of threat posed by the individual?

After each video, ask the participant group the questions set out below the video scripts in this Handbook, and facilitate a discussion, but avoid progressing too deeply into the concept of assessment (i.e., the assigning of a rating of the imminence and severity of the threat, as that will be covered later in the training).

Explain to the participants that some of these videos will, again, continue at later stages in the training, providing a narrative as to how the Threat Assessment process might further play out.

(Video 1). Are those guns real?! | Middle School:

Principal walks into AP's office and says, "Hey... Noah Smith's dad just called. He said that Noah overheard three kids talking about bringing a gun to school tomorrow. Here's the names (hands him his notes). Apparently, Anthony was showing pictures of guns on his phone..."

AP: looks at the notes handed to him... "hmm.. I'll check and see what I can find out"... starts tapping on his computer looking up the student records....

Principal: "Ok... I am going to see if Officer Wells is still here and I'll also call transportation to have them pull the video from the bus." He walks out of the AP's office.

Next scene... Principal and SRO walk into AP's office.

A.P.: "So... He said it was Anthony's phone with the pictures?

Principal: Yea.

AP: "Hm. Daniel has ok grades no discipline history to speak of... Ethan and Anthony though... Ethan has had a few write ups for things like defiance, cutting class, a few fights no serious injuries. Anthony has a pretty significant history –moved to the area after 5th grade, lives with his dad, his mother is not allowed to pick him up from school, his counselor has done some conflict resolution work between him and other kids, he seems to get into conflict with others pretty easily... Also, he has an older brother, in 11th grade, who is in alternative ed for assault of a teacher and drugs on campus.

Principal: "I'm going to go ahead and call Anthony's parents and let them know what's going on. They will need to bring him into school tomorrow so we can get some additional information."

SRO: "If you go ahead and give me the address and parent's names...I'm going to go by the house... I will keep you posted."

AP: "Ok... (moving back to his computer). I will let the rest of the team know that we will need to work on this first thing tomorrow and I will reach out to alternative ed to see if they are aware of anything going on as far as the older brother or family situation..."

Question for the group:

1. Would this situation have evolved differently if this had happened on the way to school and Noah reported to a teacher versus on the way home from school and reporting to his father? Describe what that might look like?

Videos and facilitated discussion

SLIDE 82 – Gathering Information | Video 3 Continued...



(Video 3). I'm really worried about him... | High School

Ms. Cassidy: Ok. Gina. Tell me what exactly happened today?

Gina: Well, we've been friends for a while but lately he seems really sad and withdrawn. He has a lot of problems at home and school isn't going great either. He feels like he doesn't fit in and he's like blaming everyone for his problems... We have art class together and he was showing me his journal and his drawings just seem... I don't know... dark. He used to talk to me about his feelings and stuff but now I feel like he's shutting me out. In class today, he said that maybe things would be better if he wasn't here, but he wasn't going to go alone...

Ms. Cassidy: What do you think he meant by that?

Gina: I am afraid he might be thinking about killing himself... starts crying.

Cuts away to Ms. Cassidy handing a slip of paper to the office secretary. She says, can you call Kevin Miller down? Thanks. She knocks on the office door of an administrator. "Mike, Kevin Miller is in your grade level, right?" Mike, 'Yea... why?' Ms. Cassidy, "Gina Lopez was just in my office... she's pretty worried about him... says she is afraid he is going to hurt himself." Mike, "Y'know, now that you mention it, I've been meaning to call him down to check in with him... I've seen him in the halls, and he doesn't seem like himself... his English teacher came down yesterday and said she wanted to talk to me about an assignment that he turned in... I'll go ahead and follow up with her on that..."

Cuts away to Ms. Cassidy's office. Kevin is sitting across from her. She says, "Seems like you've been having a hard time lately... what's going on?" He looks up at her and starts to talk... audio fades out... Ms. Cassidy is nodding and looking engaged.

Questions for the group

1. What do you think Ms. Cassidy is talking with him about? (she is conducting a suicide risk screening)
2. How did the information she got from "Mike" inform her decision-making?

Videos and facilitated discussion

SLIDE 83 – Gathering Information | Video 4 Continued...



(Video 4). CreepyPasta | Elementary School

Teacher brings the papers to the main office. The hallways are starting to fill with students and teachers getting ready for the day. "Good mornings" all around.

Principal is standing outside her office. Greets Teacher. "Morning Nate... How are you doing?".

Nate, "I'm ok... wanted to show you something". They enter the Principal's office.

Principal is at her desk with the papers out in front of her. "So... how is Amira doing in general?"

Nate, "Pretty well actually... I haven't noticed anything...except she is struggling a bit in math... but otherwise she seems pretty happy... gets along well with everyone... no discipline concerns... she's involved in Ms. Peters' after school running club...but these drawings... make me a little worried..."

Principal, "have you had any contact with her parents?"

Nate, "Yea. They are pretty involved. Her mom is our "room mother" and volunteers a lot... her dad came in to talk with the class about his job... he is a pilot... the kids really enjoyed hearing about what he does.."

Principal, "So... it sounds like these pictures are the only thing that stands out to you as unusual?"

Nate, "Yes"

Principal, "Ok... why don't you ask her about them this morning and see what she says..."

Principal enters counseling office. Counselor preparing for the day organizing materials on a small table in her office.

Principal: "Hi Lisa... hey... have you noticed anything different or concerning about Amira Morgan, 4th grade, Nate's class?"

Counselor: "No... she is in the running club... she seems to be doing fine... I haven't noticed anything unusual... Is everything ok?"

Principal: "Nate is concerned about some drawings she had; he is going to speak with her this morning.... keep you posted"

Nate is at his desk. Amira comes into the class, happily hangs up her backpack. Nate waves her over. She smiles and comes to his desk.

He shows her the math paper. "Hey... I wanted to ask you about this... looks like maybe you were frustrated with this? (smiling).

Amira, pouting, "Yea... I kept getting them wrong... I was mad...math is really hard"

Nate, "Ok... well, I can help you with that... but it worried me and then I found these in your desk."

Amira... "Oh those.."

Nate "Tell me about them."

Amira... "My brother watches these YouTube videos and stuff... they just popped up when I was on the computer and it's really..." (makes a face that suggests she finds them weird, gross, scary).. "I was telling Jose about them and so I drew pictures 'cause he didn't know what I was talking about. They gave me nightmares..."

Nate "Ah... Ok... well let's focus on your math and why don't I call your mom and see if we can figure out a time when you can stay after for help with that."

Amira smiling "Ok" and she heads towards her desk.

Nate on the phone with the principal. "I wanted to follow up about Amira... I talked to her and to her mom. Apparently, her older brother was watching some videos on-line and Amira ended up watching them. They scared her and she talked with her mom about it. Mom has since put controls on the computer to block those channels and talked to her older brother. She was glad that I called and will follow up with Amira when she gets home".

Nate (listening)... Yes... I know... and she is going to stay after on Thursday for some extra help with math". "Yea... thanks! talk to you soon."

Questions for the group:

1. Why do you think that Nate started the conversation with Amira talking about her math paper rather than go directly to the concerning drawings?
2. How did Amira's response to being questioned influence Nate's conceptualization of the situation?

SECTION 7 | ASSESSING THE THREAT

Instructor-led presentation with maximized participant engagement

SLIDE 84 – Introduction to Assessing the Situation and Classifying Threats (Slide 1 of 2)



Open this section by emphasizing the connection between gathering information and the assessment step.

Threat Assessment is fact-based. The Threat Assessment Team need to consciously ensure their determinations are directly linked to facts. While assessment is interpretative, the interpretation relies on facts – observed behaviors, recorded, historical observations, electronic records of concerning communications, physical evidence of possession or acquisition of weapons, etc. The information gathering that precedes the assessment of the situation enables us to make a fact-based determination as to the level of concern presented by the student and holistic view of the situation.

Instructor-led presentation with maximized participant engagement

SLIDE 85 – Introduction to Assessing the Situation and Classifying Threats (Slide 2 of 2)

Assessing the situation and classifying threats

- We use the information gathered to determine whether the threat is classified as:
 - Low Risk Threat - Low Level of Concern – **Transient Threat** unless other STEP® concerns
 - Moderate Risk Threat - Moderate Level of Concern – **Substantive Threat** at Moderate Risk / Level of Concern and beyond
 - High Risk Threat - High Level of Concern
 - Imminent Threat
 - Direct Threat
- Classification as **No Concern** is also possible and so is that the individual poses no threat to others but does pose a threat to self



We use the information gathered to determine whether the level of risk presented by the threat (also referred to as the **Level of Concern**) is classified as low, moderate, high, imminent or direct. We do this by

developing a holistic view of the case (using the STEP[©] framework) and incorporates several factors including:

- The nature, severity and immediacy of any threats posed by the individual or the capacity for becoming a threat.
- The impact of the situation on targets and others (the nature, severity, immediacy of harm).
- The nature and level of interventions necessary to prevent or mitigate harm and other impacts, and to assist those involved.

Direct the participants to Appendix 2 setting out the classifications drawn from the Model PCCD K-12 Threat Assessment Procedures and Guidelines and which, additionally, show how these interact with determinations as to whether a threat is transient or substantive. Ask the participants to read these statements and lead a facilitated discussion around any questions that are raised by the group. This session precedes the resumed videos that will enable the participant group to apply their understanding and interpretation of the classifications to real world scenarios.

Explain that, when classifying threats, the following benchmarking statements listed in the Model Procedures and Guidelines are used to help in generating consistency across assessments. The following classifications are used to review the information gathered in order to classify the level risk posed by the threat, and reflecting whether a pathway (to violence) behavior is discernible and, in general, the level of concern associated with the totality of the case (note that a range of indicative actions are also provided in here should this aspect of the training stimulate immediate discussion around what could be done in light of any assessed level of risk for violence):

- **Low Risk Threat (Low Level of Concern):** The individual/situation does not appear to pose a threat of violence or serious harm to self/others, and any exhibited issues/concerns can be easily resolved. In most cases, unless there are other STEP[©] concerns, Low Risk Threats (Low Level of Concern) would represent a **Transient Threat**.

***Range of Potential Actions:** No need to notify or take action to protect the person(s) to whom the threat was directed. Clarification, explanation, retraction, and/or apology issued; potential disciplinary action; potential referral to school or community-based resources, as appropriate.*

- **Moderate Risk Threat (Moderate Level of Concern):** The individual/situation does not appear to pose a threat of violence or serious harm to self/others at this time but exhibits behaviors that indicate a continuing intent and potential for future violence or serious harm to self/others; and/or exhibits other concerning behavior that requires intervention. Threats classified as **Moderate Risk (Moderate Level of Concern) or greater** would represent a **Substantive Threat**.

***Range of Potential Actions:** Typically, notifying intended target(s) of threat and taking precautions to protect them. Taking steps to monitor and supervise the individual who might pose a threat of violence, providing support and taking disciplinary action, if needed. Potential referral to school or community-based resources, as appropriate; for example, counseling, conflict mediation, or other interventions to reduce the threat of violence and address underlying conflicts or issues that led to the threat.*

- **High Risk Threat (High Level of Concern):** The individual/situation appears to pose a threat of violence, exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the plan; any may also exhibit other concerning behavior that requires intervention.

Range of Potential Actions: *These cases include threatening behaviors indicating the intent, planning, or preparation to cause serious bodily injury or death (e.g., to rape, physically assault, and inflict serious injury, kill, or use weapons against self or others). Notifying local law enforcement and consulting with School Safety and Security officials. As a result, actions will include taking immediate precautions to protect potential victims (e.g., direct supervision of individual who might pose a threat of violence, notifying intended targets and caregivers, etc.); taking disciplinary action, as appropriate; where mental health or disability issues are reasonably believed to cause or contribute to violence risk, an assessment should be conducted by a qualified professional, such as a licensed psychologist.*

- **Imminent Threat:** An individual/situation appears to pose a clear and immediate threat of serious violence toward self or others that requires containment and action to protect identified or identifiable target(s); and may also exhibit other concerning behavior that requires intervention.

Range of Potential Actions: *Immediate containment and action to protect identified target(s). Immediate referral to law enforcement and consultation with School Safety and Security personnel, as well as identifying Emergency Operations Plans and strategies to manage the active situation.*

- **Direct Threat:** An individual/situation poses a significant risk to the health or safety of themselves and/or others that cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of auxiliary aids or services. The direct threat standard applies when the Threat Assessment Team or school entity administration determines that an individual/situation poses a direct threat and that applicable disciplinary procedures are not available or sufficient to mitigate the threat.

- **Range of Potential Actions:** *Actions would, in many cases, be the same as for students assessed to pose a High or Imminent risk threat, with additional processes in place to permit exclusion of individual who might pose a threat of violence from school.*

Explain to the participants that, with regard to monitoring, Active Monitoring involves the Threat Assessment Team deliberately and dynamically engaging with persons involved in the case and school- and/or community-based systems to check-in regarding the status of case, responses to interventions of both the individual who was assessed to pose a risk for violence and also the target, needs of the school community, impact of environmental/systemic factors or precipitating events.

Passive monitoring, on the other hand, involves encouraging and supporting persons involved in the case, or other members of the community to report any further issues or concerns to the Threat Assessment Team, as necessary.

Videos and facilitated discussion

SLIDE 86 – Assessing Threats | Video 1 Continued...



Explain that the participants will now watch the concluding scenes of two of the videos that have been tracking the evolving cases shown throughout the training so far. Participants should note any further information that would enable them to make a determination as to the level of concern posed.

(Video 1). Are those guns real?! | Middle School | Montage video:

- a. SRO is speaking to the principal in principal's office. SRO is talking, principal is looking attentive, nodding.

Narration: *The next morning, the School Resource Officer updates the Principal on his home visit. He shares that the father was cooperative and looked at Anthony's phone in his presence. Anthony had no explanation of why the pictures were on his phone and he denied showing them to anyone. The pictures were of Anthony and his older brother's air soft guns. His older brother has been in trouble in the community and in school and is in an alternative school placement due to drugs and assault. He has been a major stressor for Mr. Peterson and a negative influence on Anthony who looks up to his older brother. Mr. Peterson allowed the officer access to the home and there are no guns. The SRO reports that Mr. Peterson seemed unsure of how to manage Anthony or his older brother right now.*

(Video Montage/Cutaways: SRO approaching house, talking with father, both looking at Anthony's phone, shaking hands when he leaves and giving his business card)

- b. Social worker is looking through the student records (several files, each with papers in them are spread out on her desk).

Narration: *The social worker reviews the student records which indicate no history of academic problems, attendance concerns or health issues but does reveal that Anthony has gone through a number of changes within his family in the last several years. In the file, there is a custody order issued the summer before starting middle school, giving sole custody of Anthony to his father and his mother is not allowed to have contact with him. Since entering middle school, Anthony has had a number of discipline referrals for defiance, disruption and verbal conflicts with peers, and these incidents have increased each year. Most notably, this year referrals include physical aggression and fights.*

(Video Montage/Cutaways: Social Worker looking through student records. Family conflict – Anthony walking away with father looking back at mother walking away, Anthony pushing a kid against a locker)

- c. Anthony and his father come to the school. They are greeted in the front office by AP, social worker and school counselor who shakes their hands.

Narration: Anthony and his father come to the school and, with his father's permission, Anthony meets with the school counselor while his father is interviewed by the social worker.

- d. Administrator and social worker are speaking with the father at a conference table or in the AP's office.

Narration: Mr. Peterson was cooperative in his meeting with the social worker. He reported that he is a single parent who works long hours often not getting home until 6 or 7. He shared that Anthony has been having problems since the beginning of middle school. In elementary school, Anthony was involved in sports playing both soccer and football. He had nice friends and liked school. Since middle school, however, Anthony tends to associate with older kids, friends of his older brother, who get in trouble in the community and he is "on a bad path". Mr. Peterson denies any history of depression but says that Anthony seems angry a lot. He shared that Anthony's mother abandoned the family when Anthony was in fifth grade and has had no contact with him or his brother since. Mr. Peterson has not considered counseling for either of his children in the past but may be willing to do so at this point. He is concerned about Anthony's future.

(Video Montage/Cutaways: Anthony being happy with friends, Anthony walking away angrily from his father, Anthony watching older brother and friends play basketball after dark)

- e. Anthony and counselor in her office, she is taking notes, Anthony is minimally engaged.

Narration: Anthony was initially guarded during the interview with the school counselor but gradually seemed to become more comfortable. He acknowledged showing the pictures to the other boys but said it wasn't a big deal. He denied having intention to harm anyone and denied having problems with other kids at school. He prefers to hang out with the high school kids in his neighborhood who are friends with his brother. Anthony went on to report that he does not have any adults in school whom he could go to with a problem. He described a stressful homelife due to his parent's divorce, his lack of contact with his mother and the fighting between his older brother and his father. He shared that he played soccer and football during elementary school but not since moving here.

(Video Montage/Cutaways: conflict with other boys, looking at brother's airsoft guns in the basement of his house, looking up to older boys who are causing trouble/being disruptive, older brother and father arguing and Anthony looking away/avoiding, picking up a football/ soccer trophy and looking at it)

- f. Boys on bus are shown talking with a male adult (individually).

Narration: Witnesses to the incident on the bus are interviewed by the assistant principal and they confirm the initial report. They report that Anthony has been having conflicts with a group of 7th grade boys and their interpretation of Anthony showing the pictures was to show off and intimidate. While they didn't think he would actually bring a gun to school, they know who his older brother is, and believed that they were real guns in the pictures.

(Video Montage/Cutaways: sitting with an adult in an office talking, flashback to the bus)

- g. Teachers (2 are shown individually speaking with AP) are shown consulting with administrator

Narration: Teachers collectively describe an academically capable student who seems to have a "chip on his shoulder". He is quick to become annoyed with other students, his peer relationships tend to be conflictual and he has a hard time letting go of things that bother him. Anthony's English teacher reports that he is an excellent writer, but she doesn't think he perceives of himself that way. She wishes that she could reach him because she sees his potential. He is not a behavior problem in her class.

(Video Montage/Cutaways: Teachers talking with AP, Anthony antagonizing peers, English teacher reading a paper turned in by Anthony (looking impressed).

- h. *Team is in the conference room – SRO, Principal, AP, Counselor, Social Worker, one of the Teachers. Principal has forms in front of him and is taking notes. Others also have paperwork in front of them as well. Each is presenting information in turn.*

Narration: The Threat Assessment Team meets and reviews the information collectively. They objectively consider the level of concern presented by Anthony and the situation and determine next steps.

Videos and facilitated discussion

SLIDE 87 – Assessing Threats | Video 3 Continued...



(Video 3). I'm really worried about him... | High School | Montage video:

- a. *The Threat Assessment Team is seated around the conference table (Administrator, counselor, SRO, social worker, teacher)*

Narration: Based on the initial interviews with Kevin and with his teacher, the Threat Assessment Team was assembled to review the available information.

In talking with the counselor, Kevin seemed depressed. He reported having no real friends commenting that people always end up not being who they say they are. He acknowledged that he has thought about hurting himself in the past but denies thinking about it now. Despite this, the counselor is concerned about him. He showed her his journal which had writings and drawings of themes of death, anger, and pain.

The administrator is also concerned based on what he learned. Kevin's teacher shared a worksheet on which he had written on the back, "I will take them one by one. Should I leave survivors?" She reported that Kevin's grades have dropped over the course of the year and he is currently failing. There is one girl in the class, Sara, who was friends with him in the beginning of the year but not now. She has distanced herself from him, moving

her seat to other side of the room. Other kids make fun of him about his clothes, his hair, anything. He doesn't really fight back other than sometimes he tries to stare them down which doesn't usually work. The teacher reports that she hasn't had any contact with his parents although she has reached out about his grades.

Sara was interviewed by the school social worker who showed her a photo on her phone that Kevin had posted last night. She used to consider Kevin a friend, but he has really changed, and she is afraid of him.

Kevin's father was called to pick him up. When Mr. Miller arrives, he is interviewed by the SRO. When asked about access to weapons, the father becomes belligerent and questions the officer's authority to ask that. The SRO explains the concerns and the father shares that he has a number of guns which are safely secured. The family has a large property with a shooting range which the whole family uses.

(Video Montage/Cutaways: Administrator talking with teacher who shows him worksheet, classroom with students where Sara is seated away from Kevin glancing over at him, other students making fun of him, Sara showing screenshot, SRO interacting with father, team around the table).*

Examples of image on Sara's phone

When your dad passes the family school shooting gun down to you



When your lunch group starts roasting the shit out of you for having a Pokemon lunch box but they don't know that you have a Glock 34 inside



The school shooter can't kill you if you are the school shooter



Once the current section of the videos have concluded, for each of the videos, participants should assess the situation and classify the threat, discussing in their group/table their reasoning and seeking to reach a consensus view. Circulate the room, assisting in steering discussions and resolving any points of clarification. Once all groups have completed their assessment, lead the collective participants through a discussion of how and why they arrived at their assessment, and explore the reasons for any differences of opinion.

Now launch the final sections of the 2 videos, discussing the participants' conclusions in light of the model answers set out below (and which also form the script of the final sections of these videos).

Model Answers:

- **(Video 1). Are those guns real?!** The model answer would be to classify this as **Moderate Risk Threat**. The following provide indicative reasons, mapped against the benchmarking statement, for this classification:
 - **Student does not pose a threat of serious violence or harm though risk cannot be ruled out.** There is little in Anthony's history that suggests a pattern of violence, although his ability to control his anger does appear to be lessening and his attraction to/posturing with weapons would generate some degree of concern.
 - **Student may be developing capability for harm and is engaging in concerning behaviors that indicate need for assistance/intervention.** Little to indicate he is developing capability for harm, but Anthony's lessening ability to manage his anger would represent a concern, as would his attraction to/posturing with weapons and his approbation of his brother's status

and that of his brother's friends, raising the question of whether he seeks a similar form of notoriety.

- **Targets and/or others likely concerned and impacted.** His father is evidently concerned that Anthony appears to be on a 'bad path', but there is little that indicates any focus or targeting of any (latent) risk for violence.
- **Environmental/systemic or precipitating factors may be present.** Anthony's home environment has been disordered and emotionally challenging, and this seems to be having a discernible (and negative) effect on him that is recognized by several people. The lack of an adult in school he feels he can share his problems with may be, avoidably, creating additional stress/channeling him toward concerning behavior.
- **(Video 3). I'm really worried about him...** The model answer would be to classify this as **High-Risk Threat**. The following provide indicative reasons for this classification:
 - **Student poses, or is rapidly developing capability for, a threat of serious violence of harm to self or others or is in urgent need of hospitalization or treatment.** Kevin has indicated ideation of self-harm previously and there are several other warning signs for self-harm. Arguably of more immediate and current concern, as imminent threat to self is not specifically indicated, is his general emotional state. He is disconnected from his peers, appears depressed, is bullied, and appears to be internalizing his anger and frustration. Images sent to Sara's phone and the theme of writings and drawings in his journal, indicate at the very least ideation as a pathway behavior. His deteriorating mental health warrants formal assessment/treatment.
 - **Targets and/or others are impacted.** The fact that Sara has voiced concerns for her safety is a concern (and would need to be explored in more detail, if possible).
 - **Typically involves environmental/systemic factors and consideration for precipitating events.** The recent break with Sara, who has physically distanced herself from him, in light of his lack of positive peer social relationships, could potentially serve as a precipitating factor and the general classroom and wider school environment is one that is likely to create reinforcing negative thoughts and feelings. His home environment is also potentially of concern. By his father's admission, all of Kevin's family use guns on their large property.
- Discuss the potential that this is High Level of Concern for both harm to others *and* self.

SECTION 8 | MANAGING THREATS

Instructor-led presentation with maximized participant engagement

SLIDE 88 – Goals of Threat Management (Slide 1 of 2)



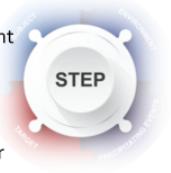
Open this section by summarizing what threat management is intended to achieve, and reflecting on the fact that recognizing a threat or a concern for violence is only the beginning; doing something about it is what may change the course of events. Recall that we discussed how threat assessment gathers information across multiple domains to gain a holistic view of the case/situation of concern. If the case or situation presents a concern for violence, the team will use this holistic view to develop, implement and monitor an individualized plan to intervene and reduce the threat.

Instructor-led presentation with maximized participant engagement

SLIDE 89 – Goals of Threat Management (Slide 2 of 2)

Goals of threat management

- Control the situation/individual to prevent the possibility of violence
- Protect and aid possible targets to the extent possible
- Provide support and guidance to help individuals deal successfully with their problems
- STEP© can provide a useful framework for approaching threat management coherently:
 - **S:** De-escalate, contain, or control the individual who may take violent action
 - **T:** Decrease vulnerabilities of the target
 - **E:** Address environment and systems to discourage escalation
 - **P:** Prepare and mitigate against precipitating events that may trigger adverse reactions



Successful management of a threatening situation can require substantial time and effort. Management of these situations comprises three related functions:

- The initial focus for the team is to address the immediate safety needs of the school community and any potential victims. This will entail taking any necessary steps to contain or control the situation and/or the individual assessed to pose risk for violence to prevent the possibility of an attack and taking protective actions to ensure the safety of possible targets.
- Once the situation is immediately contained or controlled, and any potential victims are protected – including the individual where the threat is of self-harm – the Team will use the information gathered to provide individualized support and interventions to assist the individual in dealing with the underlying issues that contribute to increased concern. Where there is concern that the individual poses a threat of self-harm, this would include referral to the Act 71 pathway.
- If the student is determined to pose a safety risk to others or, to both themselves and others, a member of the Threat Assessment Team is designated as case manager to monitor the status of the individual and to notify the Team of any change in status or additional information that would be cause for a re-assessment. Where an individual was assessed to present no threat to others, they would be wholly supported by the Act 71 team and this would not be a Threat Assessment case.

Recap that threat management is a carefully planned and implemented intervention strategy focused on the individual who might pose a threat of violence, potential targets, the environment and precipitating events which may contribute to increased risk. Using STEP[®] allows us to approach threat management in a coherent, holistic way.

Effecting change with regard to one or more of these STEP[®] domains may change the course of events in a positive way and implementing multiple, concurrent management strategies increases the odds of effectively moving an individual off the path to violence. Once the immediate threat is contained, the team will develop a plan to address the underlying factors that contribute to increased risk.

Let's refer back to the graphic we introduced earlier in the session and use it to illustrate the goals of the threat management process across the critical domains of Subject, Target, Environment and Precipitating events. The goals are to:

- **S:** De-escalate, contain, or control the **subject** – the individual who might pose a threat of violence.
- **T:** Decrease vulnerabilities of the **target**.
- **E:** Address **environment** and systems to discourage escalation.
- **P:** Prepare for and mitigate against **precipitating events** that may trigger adverse reactions.

Now take each of these in turn in the context of applied threat management.

Instructor-led presentation with maximized participant engagement

SLIDE 90 – Using STEP® (Slide 1 of 4)

Subject [Student posing a threat of violence]

- Threat Management responses generally fall into: (1). Discipline; (2). Behavioral interventions and supports; (3). Mental health support and skill-building
- Examples of strategies:
 - Increasing engagement to build rapport, decrease isolation, problem solve about grievances, monitor reactions to interventions and precipitating events
 - Referral to SAP for assistance with academic, behavioral or social-emotional challenges
 - Referral for in-school / community-based mental health assessment and/or special education or 504 Plan evaluation via MDT/CST
- For students not identified with a disability, consider whether the information gathered suggests a referral to consider special education eligibility is appropriate



 pennsylvania
COMMISSION ON CRIME
AND DELINQUENCY

Subject

Interventions should address not only the immediate safety concerns presented by the individual posing a threat of violence, but also address the underlying issues that contribute to increased risk of harm to self or others. The focus is on interventions that de-escalate, contain, control, redirect the individual away from plans and preparation for violence and toward engaging with others, problem solving, adapting, and improving their coping skills and well-being. Responses with the individuals posing a threat of violence will generally fall across three categories: discipline, behavioral interventions and supports, and mental health support and skill-building. Examples of strategies for intervention with and management of the individual include:

- Increasing engagement with the individual to build rapport, decrease isolation, problem solve about legitimate grievances, provide feedback and mentoring, and monitor reactions to interventions and precipitating events.
- Referral to SAP for assistance with academic, behavioral or social-emotional challenges.
- Referral for in-school or community-based mental health assessment and/or special education or 504 Plan evaluation via Child Study Team (CST)/Multi-disciplinary Team (MDT).
- Referral for counseling or other community-based supports.

If the individual posing a threat of violence is a student identified with a disability, the team will follow all due process procedures under IDEA/Section 504 prior to taking actions which would constitute a change in placement. The team may also consider a referral to the IEP/Section 504 team to consider whether any changes to the student's goals, services, accommodations, or placement are warranted. For students who are not identified with a disability, the Team will consider whether the information collected during the

Threat Assessment process suggests that a referral to the CST/MDT to evaluate special education eligibility is appropriate.

Instructor-led presentation with maximized participant engagement

SLIDE 91 – Using STEP® (Slide 2 of 4)

Subject [Student posing a threat of violence]

- Disciplinary actions / behavioral interventions...admonition and counseling, behavioral contracts, change class, short / long term suspension, alternative school placement or expulsion
- If behavior / communication of concern was Code of Conduct / school board policy violation, all disciplinary procedures followed, and student poses a significant risk to the health or safety of others that cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of auxiliary aids or services...
- ...the direct threat standard may be used to remove the student
- If a student posing a risk for violence is identified with a disability:
 - Follow due process under IDEA prior to taking actions which would constitute a change in placement
 - Consider referral to IEP team... Changes to goals, services, accommodations or placement warranted?



Threat management, behavioral interventions and supports and discipline are separate but related processes. Disciplinary actions are determined by the school administrator based on the seriousness of the threat and the degree to which the threat is disruptive to a safe and orderly environment. Information from the Threat Assessment may inform the disciplinary actions taken by the school administrator who has a broad range of corrective disciplinary actions that, alongside behavioral supports, may be employed including admonition and counseling, behavioral contracts, change class or school placement to minimize contact with target, detention, short-term suspension, long-term suspension, alternative school placement or recommendation for expulsion.

A student should only be removed if the threatening behaviors engaged in by the student are a violation of the relevant Code of Conduct/school board policy, and when all applicable policies and disciplinary procedures are followed. However, in the event that the applicable disciplinary procedures are not available to school-based staff and the school administration or the Threat Assessment Team believes that the individual poses a significant risk to the health or safety of others that cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of auxiliary aids or services as provided in 28 C.F.R. § 35.139, the **direct threat standard** may be used.

A Direct Threat is defined under law³³ as one in which the person poses a significant risk to the health or safety of others that cannot be eliminated or reduced by reasonable accommodations.

³³ 28 CFR 35.104: Direct Threat means a significant risk to the health or safety of others that cannot be eliminated by a modification of policies, practices or procedures, or by the provision of auxiliary aids or services as provided in § 35.139. In determining whether an individual poses a direct threat to the health or safety of others, a [school] entity must make an individualized assessment, based on reasonable judgment that relies on

The direct threat standard applies when the Threat Assessment Team or school administration determines that a student poses a direct threat, and the administration also determines that applicable disciplinary procedures are not available or sufficient to mitigate the threat. If the administration makes such a determination, the school entity is **not required** to permit a student to participate in or benefit from the services, programs, or activities of the school entity. In other words, they have the ability to exclude the student or take other appropriate actions to limit the individual's ability to directly threaten the school community.

In utilizing the direct threat standard where a student has a disability, it is important to note that a determination that a person with a disability poses a direct threat may not be based on generalizations or stereotypes about the effects of a particular disability and must be based on an **individualized assessment**, based on reasonable judgment relying on current medical evidence or on the best available objective evidence, to determine: the nature, duration, and severity of the risk; the probability that the potential injury will actually occur; and whether reasonable modifications of policies, practices, or procedures will mitigate the risk.

The school entity must comply with all applicable state and federal laws and regulations for excluding a student with a disability and ensure provision of FAPE in accordance with law and school board policy.

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SLIDE 92 – Using STEP® (Slide 3 of 4)

Target

TATs operate under the duty to **both Warn and Protect** individuals who may be under threat, at all times reiterating that the situation is not their fault, minimizing the risk of self-blame, and ensuring supports are available for them:

- Inform the target (and caregiver if a student) as to the **nature of the threat** and **who the student at risk for violence is**
- Provide coaching regarding personal safety approaches in dealing with the student at risk for violence
- Provide supportive counseling
- Support / implement strategies to minimize the target's contact with the student posing risk for violence
- Act 110 of 2020 protects students who are victims of sexual assault from having to attend the same school as the individual convicted or adjudicated delinquent of sexual assault against them



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Target

In addition to interventions focused on addressing the behavior of individuals posing a threat of violence, effective threat management will also attempt to minimize risk and negative impact on identified targets

current medical knowledge or on the best available objective evidence, to ascertain: [1]. The nature, duration, and severity of the risk; [2]. The probability that the potential injury will actually occur; and [3]. Whether reasonable modifications of policies, practices, or procedures or the provision of auxiliary aids or services will mitigate the risk.

and seek to maintain contact (where appropriate) to help monitor the actions and impact of the threat posed by the individual. Threat Assessment Teams operate under the duty to **both Warn and Protect** individuals who may be under threat.

Note that, [Act 110 of 2020](#) protects students who are victims of sexual assault from having to attend the same school as the individual convicted or adjudicated delinquent of sexual assault against them.

Where targets are identified or identifiable, or others are impacted, explain that the Team must determine ways to help them reduce their vulnerability to harm where possible. Consider things the target can do (or be coached or supported in) that increase their safety, while, importantly, reiterating that the situation is not their fault, minimizing the risk of self-blame, and ensuring supports are available for them if they are needed:

At the individual level, this might include strategies such as:

- Notifying the target's caregivers as to the nature of the threat and who the individual is who poses the threat. Engaging with caregivers should also involve providing them access to the Team to enable the swift reporting of concerns they may have in the future.
- Setting clear limits and boundaries with individuals assessed to pose a threat regarding communications and contacts – and combined with monitoring for concerning communications by that individual.
- Avoiding contact with or response to the individual who poses a threat and, where response is unavoidable, strategies to minimize reactivity to their actions. The goal here is to avoid doing things that might reinforce the individual's attempts to get a response. And if the response is an emotionally reactive response to feeling unsafe or angry, this could, variously, enrage or satisfy an individual who poses a threat, both of which could elicit further concerning behavior or communication.
- Document all contacts from or with the individual who poses a threat of violence. Maintain a log of contacts and communications, noting the date, time and means of contact, nature of contact, witnesses, and impact on the target.
- Minimize public information especially on social media.
- Maintain enhanced situational awareness.
- Vary routines – where you go, which way you go, with whom, at what times and so on. Predictability helps with targeting; unpredictability puts doubt in the mind of an individual who might intend harm that they will be able to carry out their plan.
- Utilize support systems – being or feeling like a target can be stressful. Use support systems and counseling that are available.

At the school level, there are a number of things that can be done to reduce target vulnerability, including:

- Engagement/liaison with Target – have a team member assigned as a point of contact for support and assistance.
- Change a target's class schedule, adjusting hours and locations to create separation between themselves and the individual posing a threat of violence.
- Distribute a notice to staff, informing them, at an appropriate level of detail, of the case, and requesting they help monitor and remain alert for instances where the individual who might pose a threat is present or posing a threat to a target.

- Consider increased numbers, profile or focus of school security personnel, dependent on the context.
- Consider providing safety escorts for targets.
- Help targets manage their fear or anxiety. Targets may feel helpless and unable to take steps to help themselves, needing support, encouragement, and intervention. In some cases, they may be in denial about the level of danger they are in and helping them understand risks to them and others will enable them to be more situationally aware, and consciously reflective of their behaviors toward the individual who might pose a threat of violence and others.
- Targets may be referred for counseling – whether through school resources, community service providers or via Employee Assistance Programs.

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SLIDE 93 – Using STEP® (Slide 4 of 4)

Environment and Precipitating Events

- Implement a trauma-informed approach to create a trauma-informed school community
- Enhance bullying prevention programs
- Assess school / workplace climate and support efforts to build a caring community
- Intervene with others that support or encourage the individual's violent behavior
- Take steps to increase social-emotional learning and mental health awareness across the school
- Strengthen suicide prevention programs
- Assign a case manager to monitor the student posing risk for violence and notify the Team of any change in status or exacerbation of stressors – including "last straw" / triggering events

 [PDE School Climate Hub](#)
[National School Climate Center](#)
[Bullying Prevention – stopbullying.gov](#)
[Model Trauma-Informed Approach Plan](#)
[National Center on Safe Supportive Learning Environments](#)



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Environment

In addition to addressing, where necessary, interventions with the individual posing a threat of violence and target, effective threat management also takes a holistic view of the situation, monitoring for underlying systemic causes that may be contributing not just to a given case, and perhaps to a range of cases over time. This level of intervention is about group and sub-group behavior, not just that of the individual posing a threat of violence or target. Strategies may include:

- Implement a Trauma-Informed Approach to create a trauma-informed school community.
- Enhance Bullying prevention/intervention programs.
- Assess school/workplace climate and support efforts to build a caring community.
- Intervene with associates of the individual posing a threat of violence that support or encourage violent behavior.
- Take steps to increase social-emotional learning and mental health awareness with students, teachers and staff.
- Strengthen suicide prevention programs.

- Assign a case manager to monitor the student posing a threat of violence and notify the Team of any change in status or exacerbation of stressors – including “last straw”/triggering events.
- Identify and address gaps in threat assessment and management process.



[PDE School Climate Hub](#)



[National School Climate Center](#)



[Bullying Prevention – stopbullying.gov](#)



[Model Trauma-Informed Approach Plan](#)



[National Center on Safe Supportive Learning Environments](#)

Trauma-informed Schools

To enable discussion on trauma-informed approaches, Facilitators are encouraged to explore this relatively new concept that has informed the development of Pennsylvania’s K-12 Threat Assessment approach and, more generally, is contributing to safe, caring schools.

Pursuant to Act 18 of 2019, PCCD’s School Safety and Security Committee adopted a [Model Trauma-Informed Approach Plan](#) in August 2019. Evidence-based resources and information for school entities to use as they work to develop and enhance trauma-informed communities is available through PCCD, but some foundation considerations are provided here.³⁴

Being “trauma-informed” is not about any intervention, program or process – but rather is a way in which someone views the world. Implementing and developing trauma-informed approaches are ongoing, iterative organizational change processes. A trauma-informed approach is not an intervention or a program, or a model of therapy. It is a mindset and a set of beliefs that informs the ways in which we make sense of and approach our work.

“A “trauma-informed approach” is not a program model that can be implemented and then simply monitored by a fidelity checklist. Rather, it is a profound paradigm shift in knowledge, perspective, attitudes and skills that continues to deepen and unfold over time.” (Missouri Model, 2014)

Trauma-informed approaches may encompass many things and various aspects of interventions, methods, programs can exist “within” a trauma-informed system. Above all else, a trauma-informed approach is about perceptions, beliefs, attitudes and awareness. These are approaches that fundamentally shift the way in which we understand and partner with the communities we serve. Whether in an educational system, a health care system, a judicial system – an entire city, an entire state – or even an entire country – when any of these is “trauma-informed” it means they are ***operating with an understanding of and responsiveness***

³⁴ Kirby L. Wycoff, PSY.D., ED.M., MPH., NCSP, 2020

to, what trauma is and how it impacts those who have experienced it. Trauma informed systems are those that are principled around **building and maintaining spaces where people are respectful, competent, sensitive and culturally humble.**

When striving to become a trauma-informed system or use trauma-informed approaches, it can be helpful to consider a developmental process or framework. Because we know that becoming trauma-informed is about shifting perceptions and beliefs, we can think about these in terms of how we shift them, to become more trauma-informed. As these shifts are made, it can be helpful to consider trauma-informed care on a continuum of implementation. Beliefs, perceptions, values often influence behaviors, policies and practices. As perceptions change, then behaviors, practices and policies can follow suit. One way of thinking about this continuum is to start with being *Trauma-Aware* then moving towards being *Trauma-Sensitive*, then *Trauma-Responsive* and finally, *Trauma-Informed*. Pennsylvania's [Trauma-Informed PA Plan](#), and PDE's [Empowerment Through Common Language in PA: A Dictionary of Terms Related to Trauma-Informed Approaches in Schools](#) provide a roadmap contextual focus for moving toward trauma-informed schools. Additionally, toolboxes from the following states are helpful resources when examining this trauma-informed care continuum of implementation: [Missouri Model](#), 2014; [Delaware Developmental Framework for Trauma-Informed Individuals](#), January 2024.

How then does threat assessment fit into the larger context of trauma-informed approaches? Threat Assessment is one specific process that exists within a complex educational system. Threat assessment processes are critically important and designed to ensure schools are safe places. But they exist *within* the trauma-informed school system or trauma-informed community.

"The threat assessment and intervention process is designed to prevent violence by helping the individual to *resolve the problem, thereby removing the impetus for violence. Safety precautions and legal actions are taken as part of this process when judged to be necessary to prevent imminent acts of violence.*" (Maeng, Cornell, Huang, et al 2019, p.2)

More and more recently, there is recognition that broadly, threat assessment should be primarily focused on prevention. There is a fundamental shift occurring in the threat assessment literature and practice, where we are shifting away from predictive accuracy and more towards prevention. This includes an increased focus on proactive alternatives to reactive practices (e.g., zero tolerance practices). This shift has made it even more clear that there are intimate and inextricable connections between trauma-informed approaches, and threat assessment.

For threat assessments themselves to be "trauma-informed," they must exist and operate within a trauma-informed system. The pillars of trauma-informed care are relevant in understanding how threat assessment and trauma-informed approaches are related. The pillars of trauma-informed care include: Safety, Connection, and Emotional Regulation (Bath, 2008). In his seminal article "The Three Pillars of Trauma-Informed Care," Howard Bath notes that:

"Trauma-informed denotes an ever-emerging body of literature and practice representing the convergence of various disciplines, such as research in the fields of traumatology and neurobiology, as well as concepts gleaned from various developmental theories such as attachment and cognitive development, combined with emerging data regarding intervention methods most effective at helping persons heal and resume their development" (Berardi & Morton, 2017).

In order for the threat assessment process to be truly effective, it must be conceptualized within the broader context of trauma-informed approaches. The locally-implemented threat assessment and management approaches that are deployed at the individual school entity level must ensure that their overarching community and system are in fact trauma-informed, if they are to be truly effective in their work.³⁵

Threat Assessment Team members should participate in trauma-informed approach training (as part of the Professional Development Plan or school safety and security training). School entities should ensure that school directors and certificated staff participate in trauma-informed approach training in accordance with law (24 P.S. 328 and 1205.7) and consider adopting trauma-informed approach plans and board policies.

Precipitating events

Through Threat Assessment and Management, information is gathered that will inform the team about stressors in the student's life, both acute and chronic. These stressors may leave them vulnerable to a "last straw" or triggering event which may cause them to advance on the path to violence. Effective case management, for individuals at increased risk for violence, will include assigning a case manager who can monitor the individual and notify the team of any change in status or exacerbation of stressors.

Facilitated discussion

SLIDE 94 – Coordinating with Others

Coordinating with others

- TA is designed to work in conjunction with, and not in place of, existing programs and frameworks, including:
 - Student Assistance Program (SAP)
 - Multi-Tiered Systems of Support (MTSS)
 - Positive Behavior Interventions and Support (PBIS)
 - School climate initiatives
 - Trauma-informed approaches
 - Social-emotional learning
 - Suicide prevention and awareness
- It is **vitally important that these Teams can work together** and not in isolation or in conflict

Multidisciplinary Threat Assessment efforts are designed to work in conjunction with, and not in place of, existing programs and frameworks focused on promoting the safety, well-being, and success of all students, including:

- Student Assistance Program (SAP).
- Multi-Tiered Systems of Support (MTSS).
- Positive Behavior Interventions and Support (PBIS).
- School climate initiatives.

³⁵ Missouri Model: A Developmental Framework for Trauma Informed, MO Dept. of Mental Health and Partners (2014).

- Trauma-informed approaches.
- Social-emotional learning.
- Suicide prevention and awareness.

It is vitally important that these Teams can work together and not in isolation or in conflict. Scheduled or protocol-driven liaison and the [frequently the case] representation on multiple teams will enable this. In 2019, PCCD published guidance for coordination and communication with other school-based teams for Threat Assessment Teams, with a focus on SAP and Special Education teams, and Threat Assessment Team members as advised to consult this guidance.



[PCCD Guidance for coordination and communication with other school-based teams for TATs](#)

Facilitated discussion

SLIDE 95 – Tiered Interventions (Slide 1 of 3)

Tiered interventions

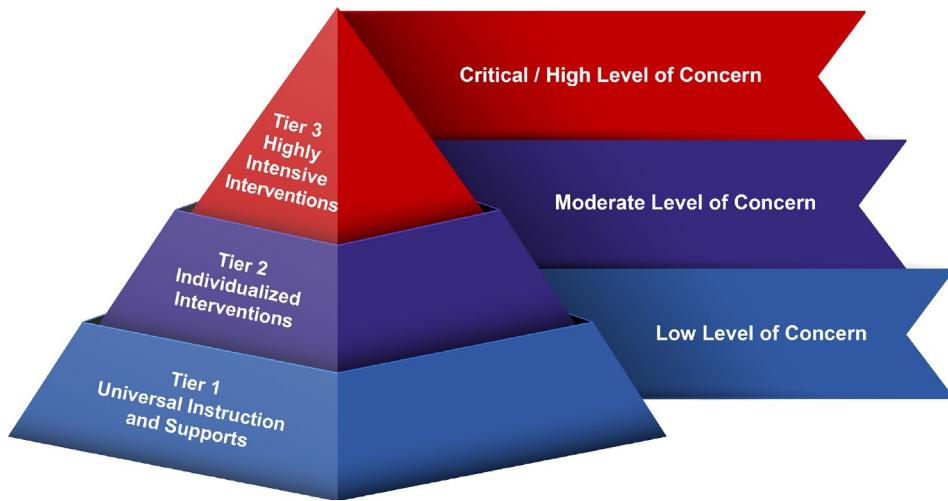
- STEP enables us to track the complex, multi-factor nature of BTAM cases from Inquiry to Management
- TATs can additionally use MTSS / VTSS to help determine the specific mix / intensity of interventions
- MTSS provides a framework for responding to situations of concern – whether those involving TA or complementary / parallel processes associated with academic performance, behavior and social-emotional wellness
- Must be applied holistically



The individualized assessment of the level of concern and the unique circumstances of the student and their situation will inform the team's decisions around risk mitigation and the types of intervention strategies that might be used to manage the threat.

STEP therefore provides a valuable tool that enables us to track the complex, multi-factor nature of Behavioral Threat Assessment and Management cases through from Inquiry and the gathering of information through to the development of the Threat Management approach.

Threat Assessment Teams can additionally use the Multi-tiered Systems of Support (MTSS) framework to help in determining the specific mix and intensity of strategies appropriate to the level of concern presented.



MTSS is a widely understood framework for responding to situations of concern – whether those that have passed through the Threat Assessment process or other complementary or parallel processes associated with academic performance, behavior and social-emotional wellness. MTSS is recommended by SSSC in its Model Trauma-Informed Approach Plan and the Model K-12 Threat Assessment Procedures and Guidelines.

In its application to Threat Assessment and Management, it can be used to further develop proposed interventions proportional to the level of assessed concern, and which are part of the wider program of efforts to build and maintain safe, secure and positive school environments.

An identified weakness of this type of tiered or matrix approaches are that they can be relatively one-dimensional in that the focus tends to fall solely on the individual and the assessed level of risk for violence, and not on the totality of the case.

However, where applied holistically, and in response to a holistic assessment of the level of concern presented by the totality of the situation, MTSS does enable a structured and logical approach to the design of the case management strategy.

It is not intended to be followed dogmatically of course. Just because a student presents a low level of concern does not mean that the impact on their targets or on the environment, for instance, will be short lived and/or limited. The case may have created a profound impact on perceptions of safety at an environmental level, and intended targets may have, individually, been left deeply traumatized because of specific dimensions of the case, such as it triggering memories of a past act of violence or targets being selected who were chronically emotionally vulnerable.

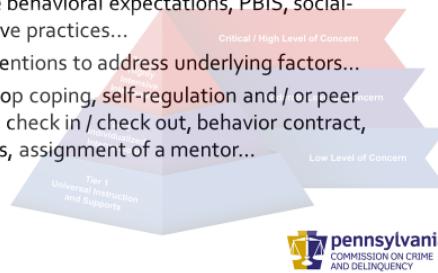
Team members using MTSS should do so continuously reflecting on STEP, “Are the Tier responses and strategies going to address the level of concern presented by the overall case and, critically, are there any aspects of the Subject, Target, Environmental or Precipitating Events domains that, in this individualized context, require specific interventions that may not otherwise have been part of the MTSS tiered approach?”

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SLIDE 96 – Tiered Interventions (Slide 2 of 3)

Tiered interventions

- **Tier 1:** Foundation for the MTSS framework and encompasses the entire school / practices that contribute to a positive school climate...
- ... proactive classroom management strategies, positive relationships between staff and students, clear and objective behavioral expectations, PBIS, social-emotional learning curricula, restorative practices...
- **Tier 2:** Individualized, targeted interventions to address underlying factors...
- ... in-school group counseling to develop coping, self-regulation and / or peer relationship skills, academic supports, check in / check out, behavior contract, referral to community based resources, assignment of a mentor...



Where time allows, explore in more detail the range of options available at the different tiered levels of support and encourage open discussion of how longer-term benefits of a more holistic approach to threat management can be achieved and what factors may put pressure on school entities and their ability to secure the full value of MTSS – including knowledge and awareness, resources, time and space in demanding work environments and schedules.

Emphasize that the tiered interventions listed here:

- Are indicative and not intended to be prescriptive.
- Can be applied selectively, as directed by STEP®, so Tier 1 interventions may be appropriate primarily to address a situation presenting a low level of concern, but there may be aspects of that situation, such as the mental health of the individual posing a threat of violence or targets that warrant more intensive intervention.

Tier 1

Tier 1 is the foundation for the MTSS framework and encompasses the entire school with core instructions and basic interventions. It includes practices that contribute to a positive school climate, such as proactive classroom management strategies, positive relationships between staff and students, clear and objective behavioral expectations, Positive Behavioral Intervention and Supports (PBIS), social-emotional learning curricula and restorative practices. This is where we see the link between school climate and violence prevention.

Students and situations deemed low level of concern will generally be addressed through Tier 1 supports and practices. That said, if needs are identified through the Threat Assessment process that cannot be adequately met by Tier 1 interventions, the individual will be referred for appropriate supports or interventions that fall under Tiers 2 or, in some instances, 3.

Tier 2

Students and situations considered at moderate level of concern for violence will likely require individualized and targeted interventions to address the underlying factors that contribute to increased concern. Examples of support services and skill building strategies that might be considered at this level include in-school group counseling to develop coping, self-regulation and/or peer relationship skills, academic supports, a behavior contract, check-in/check-out, referral to SAP, referral to community-based resources, or the assignment of a mentor.

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SLIDE 97 – Tiered Interventions (Slide 3 of 3)

Tiered interventions



- **Tier 3:** Highly intensive, individualized interventions and supports...
- ... multi-agency involvement, potentially criminal charges / high discipline consequences, potential change in educational placement, SPED eligibility or placement, referral for mental health assessment, increased supervision and monitoring, FBA, BIP...

Tier 3

Students and situations considered to represent a high level of concern for targeted violence will require highly intensive and individualized interventions and supports. These situations will include multi-agency involvement, potential criminal charges, high discipline consequences, potential change in educational placement, consideration of special education eligibility or placement if already identified as a student with a disability, increased supervision and monitoring, as well as Functional Behavior Assessment and Behavior Support or Intervention Plan, and referral for mental health assessment/services.

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SLIDE 98 – Re-entry and Safety Plans (Slide 1 of 3)

Re-entry plans

- **Purpose:** Identify and address issues that led to the crisis
- Required for any student returning to school after a high-risk threat to self or others
- Case manager contacts caregiver(s) to arrange the meeting. If arranged by phone, a notification letter should be given to the caregiver(s) on the day of the meeting

Who should be included in the re-entry team meeting?

- Team should secure a release to exchange information with the student's mental health provider, if student is in treatment
- If a disability is suspected, refer to the MDT / CST



Discuss how, in the previous section you introduced the terms/concepts of the Re-entry and Safety Plans, and we will now look at these in a little more detail.

A re-entry meeting and the completion of a re-entry support plan form should be required for any student returning to school after a high level of risk for violence to self or others, such as following suspension as a result of disciplinary action or a hospitalization, for instance following self-harm or an attempted suicide. The case manager should contact caregivers by phone or letter to arrange the meeting. If by phone, a notification letter should be given to caregivers on the day of the meeting.

Pose the question:

Who should be included in the re-entry meeting? Elicit the answers that the team may include:

- Student and caregivers.
- Threat Assessment Team case manager.
- School psychologist, school counselor, and/or school social worker.
- School nurse.
- School administrator.
- School Resource Officer or School Police Officer (if necessary and available and, where not available but where law enforcement would be beneficial, seeking external law enforcement's attendance).
- School Safety and Security Coordinator.
- Community mental health care provider (if available).

School staff should secure a release to exchange information with the student's mental health provider, if the student is in treatment, so the school and the provider can coordinate safety efforts. If the team suspects a disability, the student should be referred to the CST/MDT. The purpose of the meeting is to review the issues identified through the Threat Assessment that led to the crisis, augmenting this

understanding with new information that may subsequently come to light such as from mental health service providers, treatment plans, and Special Education assessment outcomes.

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SLIDE 99 – Re-entry and Safety Plans (Slide 2 of 3)

Re-entry plans

- Supports listed in the re-entry plan as actions to be taken by the school, caregiver, or student
- Ensure actions are assigned ***to a named individual***
- Case Manager responsible for communicating the plan within the TAT and other school staff, for monitoring it and reconvening TAT if necessary
- Team, caregivers, student sign the plan and copy given to caregivers and student
- Plan should be attached and stored with the threat management case record
- ***If determined the student poses a continued threat of violence, TAT will develop, implement, and monitor an individualized Safety Plan***



After the Team identifies needed supports, they are listed in the re-entry plan as actions to be taken by the school, caregiver, or student. Persons responsible for each action should be named. The case manager has the responsibility for communicating the plan to other team members and school staff, monitoring the plan, and reconvening the team for monitoring. Team members, caregivers, and the student sign the plan and a copy is given to the caregiver and student. The plan should be attached and stored with the threat management case record, and the case manager should also keep a copy for student monitoring.

If it is determined that the individual poses a threat of violence, the Threat Assessment Team will develop, implement, and monitor an individualized plan known as a Safety Plan to intervene and reduce the threat.

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SLIDE 100 – Re-entry and Safety Plans (Slide 3 of 3)

Safety plans

- **Purpose:** To establish and maintain consistent measures to follow in cases *when a student displays unsafe behavior AND is considered at risk for future unsafe behavior*
- Must be individualized
- Addresses a specific behavior that is dangerous to the student / others
- Safety Plans will generally cover:
 - Description of the specific unsafe behaviors and warning signs or triggers
 - Crisis Response Plan
 - Strategies known to be effective in de-escalating the situation
 - Supports to be put in place to lessen the likelihood of the unsafe behavior
 - Plan for monitoring and terminating the plan



The purpose of a Safety Plan is to establish and maintain consistent *measures for school personnel to follow in cases when a student displays unsafe behavior AND is considered at risk for future unsafe behavior* (e.g., threat to self or others including cutting, fire setting, inappropriate sexual touching). An individual student Safety Plan addresses a specific behavior that is dangerous to the student and/or others. Important components of a Safety Plan are:

- Description of the specific unsafe behaviors (e.g., reason why the student requires a Safety Plan).
- Development of a Crisis Response Plan – the actions that will be taken if the student exhibits the concerning behavior and who will be responsible for the actions.
- Identification of the warning signs or triggers for the unsafe behavior and strategies that are known to be effective in de-escalating the situation, including:
- For all threats – to self and others – the removal of ‘means.’ This is best agreed to at the re-entry meeting, so caregivers agree to remove means (firearms, prescription medications, etc) noting that acquisition of the means to cause harm is most likely going to occur at home.
- Identification of the behavior supports that will be put in place to lessen the likelihood of the unsafe behavior (e.g., increased supervision and monitoring in specific situations, transition planning, transportation to and from school, plan for unstructured time, searches).
- Establishing the plan for monitoring and terminating the plan when no longer required.
- For suicide risk, the individualized safety plan is a tool for the student and not a broader plan that documents others’ actions. It might be embedded within a broader plan but has very specific components which might, for instance, include: creating internal and external distractions as means to prevent introspectivity; statements written by them from their ‘well self’ to their ‘suicidal self’ to be read in times where suicidal thoughts are returning; contact details for close friends, family, mentors or mental health practitioners so these are immediately to hand; actions to keep their home a safe place, including removal of means and triggers.

Group discussion exercise

SLIDE 101 – Re-entry and Safety Planning and Threat Management



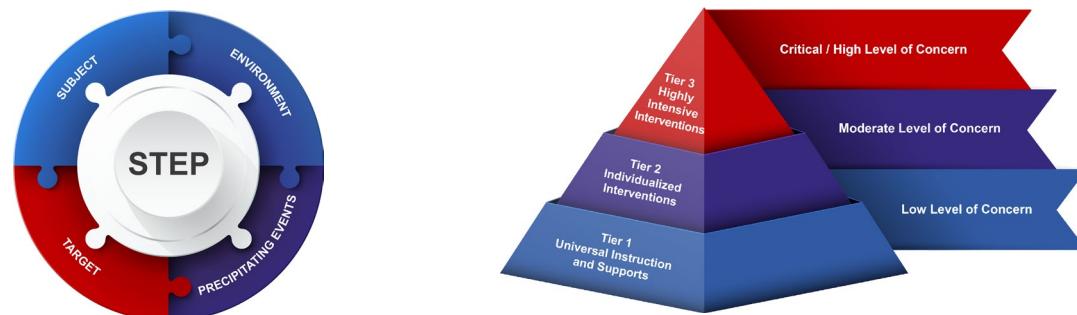
Inform the participants that we will now return to the two cases we worked on previously, Anthony and Kevin, to develop our response, management and support plan, including any aspects of relevance in Re-entry/Safety Plans.

Moderate Risk Threat – Moderate Level of Concern:

Prompt them to pull out their notes for Anthony ("Are those guns real?" Video), who was determined to represent a moderate level of concern.

Remind participants that the goals are to control and/or contain the situation to prevent the possibility of violence, to protect and aid possible targets and to develop a plan to address underlying issues or conflicts. Focus the participants on the development of an individualized plan. What might that look like for Anthony?

Showing the STEP® and tiered interventions graphics, prompt the participants to take a few minutes and think about what some of the interventions might look like? Ask them to share and discuss within their group, and then back to the main group.

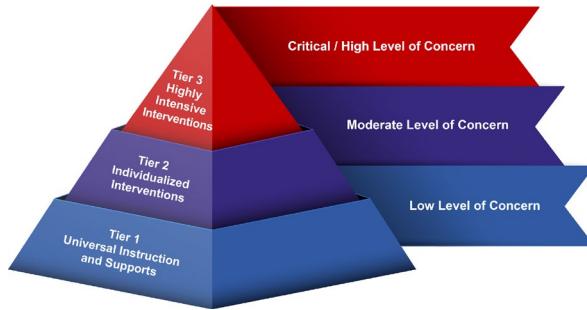


STEP® Copyright Deisinger & Randazzo (2008)

Interventions might include: Check in/Check out, referral for counseling, small group counseling, assigning a mentor, family support through community based mental health, build on strength in writing, behavior plan/behavior contract, etc.

High Risk Threat – High Level of Concern:

Now ask the participants to turn to Kevin ("I'm really worried about him?" Video). Remind them that Kevin's case was determined to present a high level of concern, which means there are some additional safety considerations and notifications that are required.



STEP[®] Copyright Deisinger & Randazzo (2008)

Showing the STEP[®] and tiered interventions graphics, prompt the participants to take a few minutes and think about what some of the interventions might look like? What might an individualized plan look like for Kevin? Is there any information that was not gathered during the assessment that you would want to know? How might we get that information? We would want to get answers to any unanswered questions to ensure that we develop an appropriate and, hopefully effective, intervention plan.

Have participants work in groups to identify what kinds of interventions and safety planning steps might be taken. Interventions might include: Do they have a disability, if so, re-visit their IEP (and adding goals, related services, Behavior Support or Intervention Plan as necessary) – if no disability, assess requirement for special education?; assessing risk for suicide; check in/check out, providing referrals to community-based providers, assigning a mentor.

Consider also the impact Kevin's actions may have had on those around him – Sara, his classmates, others who the Inquiry may have identified as being potential targets. What interventions here might be appropriate, and, additionally, is there anything the Team could or should do with regard to his home environment?

Remind them that a case manager will need to be assigned to monitor the interventions plan and update the team as appropriate.

Pennsylvania Commission on Crime and Delinquency
K-12 Threat Assessment Training: Train the Trainer Manual



Instructor-led presentation with maximized participant engagement

SLIDES 102 to 103 – Final Group Thoughts and Questions



Further Information

PA Threat Assessment Technical Assistance Network
contact@PAK12TATAN.org

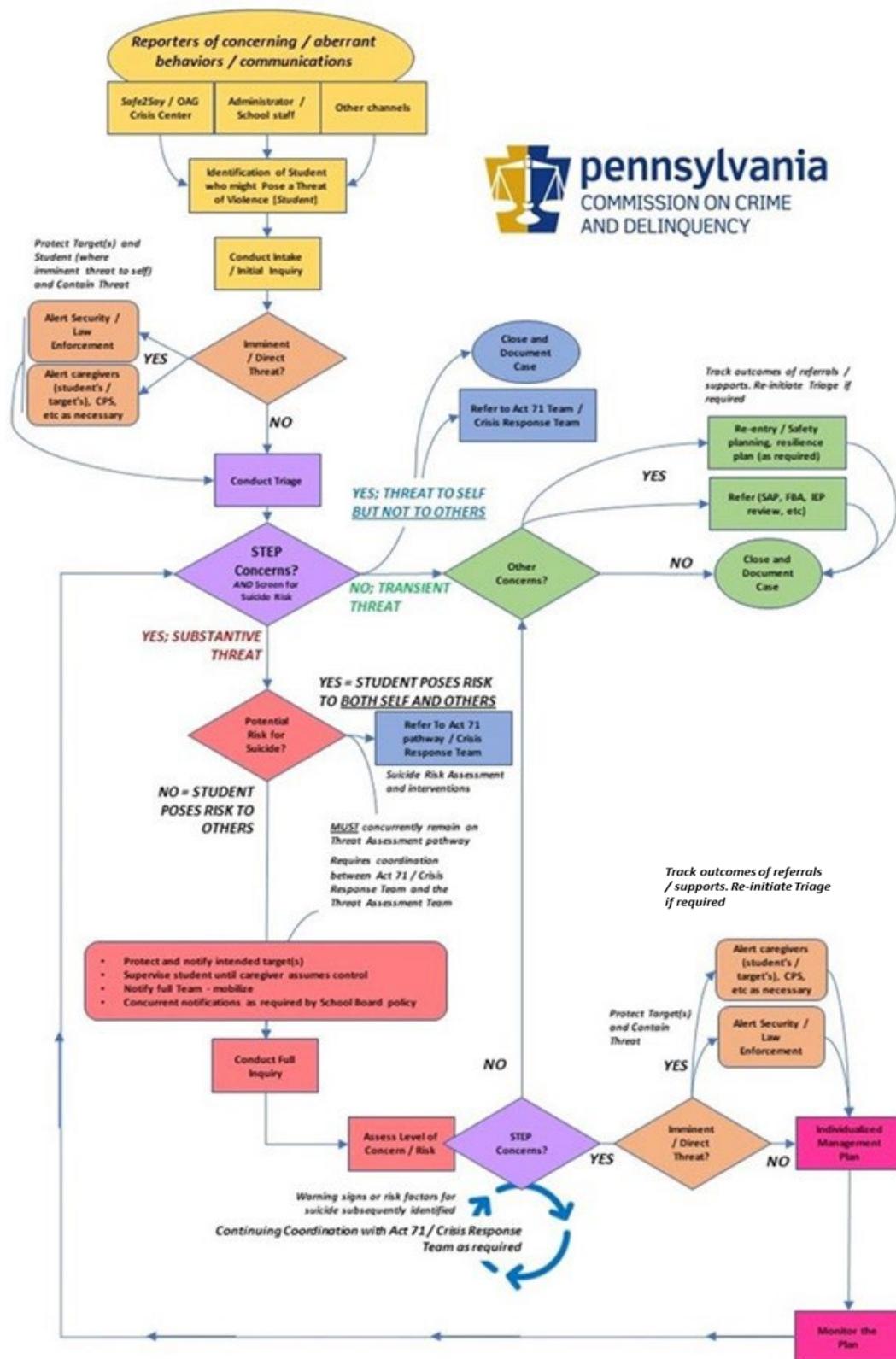
PCCD, Safe Schools Program Manager
name@pccd/etc

Close the training session by asking participants if they have any final questions.

Thank them for their time and engagement with the training and point them toward the PCCD team and the Technical Assistance Provider Network should they have any further questions regarding K-12 Threat Assessment and Management.

PART C: APPENDICES

APPENDIX 1 | THREAT ASSESSMENT & MANAGEMENT INTEGRATED PROCESS FLOWCHART & CASE MANAGEMENT FORM



THREAT ASSESSMENT CASE MANAGEMENT FORM

PART 1: INTAKE / INITIAL INQUIRY		
Person Completing Form:		Position:
Date Reported:	Time:	<input type="checkbox"/> AM <input type="checkbox"/> PM
Was this a Safe2Say Something Report? <input type="checkbox"/> Yes <input type="checkbox"/> No		If Yes; Safe2Say Something Ref#:

REPORTING PARTY:		
Name:	Position (circle): Student Teacher	
Contact Phone:	Administrator	Staff Volunteer
School/Program/Grade:	Parent/Guardian	Anonymous
Did you witness this threat? <input type="checkbox"/> Yes <input type="checkbox"/> No	Other: _____	
If NO, how did you learn about it?		

STUDENT WHO MAY POSE A THREAT OF VIOLENCE (SUBJECT OF CONCERN):			
Student Name:		Grade:	
Date of Incident:	Time: <input type="checkbox"/> AM <input type="checkbox"/> PM	Student ID:	
Location of Incident:	Mode (circle): In-Person Phone Text Letter Social Media Internet Email Gesture Other: _____		
Did the threat involve a weapon? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, identify type of weapon:		
Name(s) of any witnesses:			
Description of Concerning Behaviors or Communications (Use additional paper if needed to provide as much detail as possible, including language quoted. Attach copies of files/images/videos received in writing or electronically):			
Does this student have an IEP/504? <input type="checkbox"/> Yes <input type="checkbox"/> No		If yes/unknown, contact Director of Special Education. DATE/TIME notified:	

PART 1: INTAKE / INITIAL INQUIRY | SUBJECT AND TARGET INQUIRIES

Student Engaging in Threatening or Otherwise Concerning Behavior:
(If more than one student, complete additional forms)

Student Interview Summary:

TARGET (1):

Name:	ID#:			
Relationship to STUDENT [SUBJECT OF CONCERN]:		Position (circle):	Student	Teacher
		Administrator	Staff	Volunteer
School/Program/Grade:		Parent/Guardian	Contractor	
Did you witness this threat? <input type="checkbox"/> Yes <input type="checkbox"/> No		Other: _____		
Emergency Contact NAME:		Emergency Contact Number:		
Target Interview Summary:				

**If more than one student subject of concern or more than one target in this incident, attach additional copies of this page.*

PART 1: INTAKE / INITIAL INQUIRY | WITNESS INQUIRIES

WITNESS (1):	
Name:	ID#:
Relationship to STUDENT:	Position (circle): <input type="checkbox"/> Student <input type="checkbox"/> Teacher Administrator <input type="checkbox"/> Staff <input type="checkbox"/> Volunteer Parent/Guardian <input type="checkbox"/> Contractor Other: _____
School/Program/Grade:	
Emergency Contact NAME:	Emergency Contact Number:
Witness Interview Summary:	

WITNESS (2):	
Name:	ID#:
Relationship to STUDENT:	Position (circle): <input type="checkbox"/> Student <input type="checkbox"/> Teacher Administrator <input type="checkbox"/> Staff <input type="checkbox"/> Volunteer Parent/Guardian <input type="checkbox"/> Contractor Other: _____
School/Program/Grade:	
Emergency Contact NAME:	Emergency Contact Number:
Witness Interview Summary:	

**If more than two witnesses in this incident, attach additional copies of this page.*

PART 1: INTAKE / INITIAL INQUIRY | RECORD REVIEW & OUTCOME OF SEARCH OF PERSON / PROPERTY

RECORDS CHECKED	S=Significant NS=Not Significant NA=Not Applicable	Remarks [include only where associated with significant findings]
Photo	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Prior Threat Assessment Case(s)	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Prior Act 71/Suicide Risk Case(s)	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Health Records	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
SAP Referrals	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Conduct/Discipline	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Class Schedule	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Academic Records	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
IEP/504	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Records from prior schools	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Mental Health Evaluations	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Criminal Records	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Law Enforcement Contacts	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Juvenile Probation Records	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Driver License Information	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Vehicle/Parking Information	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
SRO/School Police Contacts	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Protective/No Contact Orders	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
No Trespass Notice	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Weapons Permit(s)	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Social Media Presence	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Internet Usage/Search History	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Title IX Actions	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Search of person or property	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Records from Outside Agencies (e.g. social services/mental health)	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	
Other (Describe):	<input type="checkbox"/> S <input type="checkbox"/> NS <input type="checkbox"/> NA	

*Attach additional copies of this page or supporting documentation if needed.

PART 2: IMMINENT/DIRECT THREATS	
Did the student subject of concern identify a direct target? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, include NAME(S) of targets:
Were target(s) notified? <input type="checkbox"/> Yes <input type="checkbox"/> No Date/Time notified:	Were parents of target(s) notified? <input type="checkbox"/> Yes <input type="checkbox"/> No Date/Time notified and Name of Parent/Guardian:
Is this an imminent threat requiring law enforcement attendance? <input type="checkbox"/> Yes <input type="checkbox"/> No Is medical attention required? <input type="checkbox"/> Yes <input type="checkbox"/> No	The following have been notified (circle): 9-1-1 SRO/School Police Building Principal Superintendent Other Threat Assessment Team Members Parents/Guardians School Safety and Security Coordinator Children & Youth Services
Is there imminent suicide risk? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, DO NOT LEAVE THE STUDENT ALONE.	If YES, have parents been notified? <input type="checkbox"/> Yes <input type="checkbox"/> No
<p>For all imminent/direct threats, protect target(s) and student (for threat to self) and contain threat.</p> <p>Additional Information Regarding the Reported Student or Incident/Behavior:</p> <p> </p> <p> </p>	
<p>Is this student acting alone? <input type="checkbox"/> Yes <input type="checkbox"/> No If No, include NAME(S) of others also engaging in concerning behaviors/communications:</p> <p> </p>	

PARENT/GUARDIAN CONTACT (Coordinate with Building Principal):	
Parent Guardian NAME(S):	Contact Phone Number(s):
Date Notified:	Method of Contact:
Name of Staff who Contacted Parent(s)/Guardian(s)	

ONLY ONCE THE IMMINENT / DIRECT THREAT IS CONTAINED CAN THE THREAT ASSESSMENT TEAM PROCEED TO PART 3

PART 3: TRIAGE (*Questions adapted from INVESTIGATIVE THEMES described by the National Threat Assessment Center (NTAC)*)

INVESTIGATIVE THEMES		SIGNIFICANT FINDINGS
Motive: Does the student have motive(s) or grievances? <i>What first brought them to someone's attention?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Communications: Has the student engaged in concerning, or otherwise threatening communications suggesting ideas, intent, planning or preparation for violence?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Inappropriate Interests: Has the student shown any inappropriate interest in, fascination, and / or identification with other incidents of mass attacks or other acts of targeted violence?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Weapons Access: Does the student have (or are they developing) the capacity to carry out an act of targeted violence?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Stressors: Has, or is, the student experiencing stressful events, setbacks, challenges or losses or are there circumstances that may affect the likelihood of an escalation to violent behavior?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Desperation or Despair: Is the student experiencing hopelessness, desperation, and/or despair?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Mental Health Disorders and Developmental Issues: Does the student have a diagnosed mental health disorder or developmental issue or exhibit behaviors that suggest a mental health disorder or developmental issue?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Violence as an Option: Does the student see violence as an acceptable, desirable (only?) way to solve a problem?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Concerned Others: Are other people concerned about the student's potential for violence?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Planning and Capacity to Carry Out an Attack: Does the student have the ability, intent and will to plan and carry out an attack?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Consistency: Are the student's conversation and "story" consistent with his or her actions?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Protective Factors: Does the student have a positive, trusting, sustained relationship with at least one responsible person?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	

TRIAGE NOTES (Also refer to Appendix 1 for case formulation):

TRIAGE NOTES (Also refer to Appendix 1 for case formulation):			
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THREAT CLASSIFICATION

<input type="checkbox"/> No Threat / Transient Threat	<input type="checkbox"/> Substantive Threat	<input type="checkbox"/> Imminent/Direct Threat	<input type="checkbox"/> Threat to SELF
---	---	---	---

TRIAGE RECOMMENDATION:

<input type="checkbox"/> No Threat / Transient Threat: DOCUMENT & CLOSE CASE <u>UNLESS OTHER CONCERNs EXIST</u> - IN WHICH CASE CONDUCT RE-ENTRY / SAFETY PLANNING AND / OR REFER (E.G., TO SAP)	<input type="checkbox"/> Unknown or Substantive Threat: INITIATE FULL INQUIRY	<input type="checkbox"/> Imminent/Direct Threat INITIATE CRISIS RESPONSE PROTOCOL (CRP) FROM EMERGENCY OPERATIONS PLAN*	<input type="checkbox"/> Threat to SELF REFERRAL(S) CLOSE THREAT ASSESSMENT CASE <u>UNLESS THREAT TO OTHERS IS ALSO PRESENT</u>
---	--	--	---

*For Imminent/Direct Threats, initiate full threat assessment inquiry once the student, target, and environment are made safe.

PART 4: THREAT TO SELF

For All Threats to Self, Implement the Following:
<ul style="list-style-type: none"> Refer to Act 71 Team / Crisis Response Team (CRT) Close and Document Case Should the Act 71 Team / CRT identify potential for threat to others, refer back to the Threat Assessment Team

PART 5: TRANSIENT THREATS

Are OTHER Concerns Present?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
If NO OTHER Concerns, Close and Document Case	
If YES, OTHER Concerns are Present or Unknown, Then Implement the Following:	
<ul style="list-style-type: none"> Re-Entry / Safety Planning; Resilience Plan (as required) Referrals (SAP, FBA, IEP Review, etc.) Track Outcomes of Referrals / Supports; Re-Initiate Triage if Required 	

TRIAGE COMPLETED BY:

Name	Position	Signature	Date
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REVIEWED BY:

Name	Position	Signature	Date
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PART 6: SUBSTANTIVE THREATS – FULL INQUIRY				
Is there also potential suicide risk? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, RETURN to PART 4 Student remains on Threat Assessment Pathway Act 71 Team / CRT coordinate with TAT			
If YES, DO NOT LEAVE THE STUDENT ALONE.				
For ALL Substantive Threats, Implement the Following: <ul style="list-style-type: none"> • Protect and notify intended target(s) • Supervise student until caregiver assumes control • Notify full team – mobilize • Concurrent notifications as required by School Board Policy 				
CONDUCT FULL INQUIRY & ASSESS LEVEL OF CONCERN / RISK				
<p>Student Engaging in Threatening or Otherwise Concerning Behavior: <i>(If more than one student, complete additional forms)</i></p> <p>Student Interview Summary (A more in-depth interview may be conducted for substantive threats. Provide detail here):</p> <div style="border: 1px solid black; height: 150px; margin-top: 10px;"></div>				
<p>PARENT/GUARDIAN INTERVIEW</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Name:</td> <td style="width: 50%;">Relationship to STUDENT [SUBJECT OF CONCERN]:</td> </tr> </table> <p>Parent/Guardian Interview Summary:</p> <div style="border: 1px solid black; height: 150px; margin-top: 10px;"></div>			Name:	Relationship to STUDENT [SUBJECT OF CONCERN]:
Name:	Relationship to STUDENT [SUBJECT OF CONCERN]:			

**If more than one student subject of concern or more than one parent/guardian interview, attach additional copies of this page.*

CONTRIBUTOR INTERVIEW (May include other caregivers, teachers/school staff, police/SRO, community-based providers, other students, etc.)	
Name:	ID#:
Relationship to STUDENT:	Position (circle): <input type="checkbox"/> Student <input type="checkbox"/> Teacher <input type="checkbox"/> Administrator <input type="checkbox"/> Staff <input type="checkbox"/> Volunteer <input type="checkbox"/> Parent/Guardian <input type="checkbox"/> Contractor <input type="checkbox"/> Other: _____
School/Program/Grade:	
Emergency Contact NAME:	Emergency Contact Number:
Interview Summary:	

CONTRIBUTOR INTERVIEW (May include other caregivers, teachers/school staff, police/SRO, community-based providers, other students, etc.)	
Name:	ID#:
Relationship to STUDENT:	Position (circle): <input type="checkbox"/> Student <input type="checkbox"/> Teacher <input type="checkbox"/> Administrator <input type="checkbox"/> Staff <input type="checkbox"/> Volunteer <input type="checkbox"/> Parent/Guardian <input type="checkbox"/> Contractor <input type="checkbox"/> Other: _____
School/Program/Grade:	
Emergency Contact NAME:	Emergency Contact Number:
Interview Summary:	

CONTRIBUTOR INTERVIEW (May include other caregivers, teachers/school staff, police/SRO, community-based providers, other students, etc.)	
Name:	ID#:
Relationship to STUDENT:	Position (circle): <input type="checkbox"/> Student <input type="checkbox"/> Teacher <input type="checkbox"/> Administrator <input type="checkbox"/> Staff <input type="checkbox"/> Volunteer <input type="checkbox"/> Parent/Guardian <input type="checkbox"/> Contractor <input type="checkbox"/> Other:
School/Program/Grade:	
Emergency Contact NAME:	Emergency Contact Number:
Interview Summary:	

CONTRIBUTOR INTERVIEW (May include other caregivers, teachers/school staff, police/SRO, community-based providers, other students, etc.)	
Name:	ID#:
Relationship to STUDENT:	Position (circle): <input type="checkbox"/> Student <input type="checkbox"/> Teacher <input type="checkbox"/> Administrator <input type="checkbox"/> Staff <input type="checkbox"/> Volunteer <input type="checkbox"/> Parent/Guardian <input type="checkbox"/> Contractor <input type="checkbox"/> Other:
School/Program/Grade:	
Emergency Contact NAME:	Emergency Contact Number:
Interview Summary:	

*If additional contributors in this incident, attach additional copies of this page.

PART 6: SUBSTANTIVE THREATS – FULL INQUIRY (Questions adapted from *INVESTIGATIVE THEMES* described by the National Threat Assessment Center (NTAC)) – The themes explored here deliberately replicate those used at the *Triage* stage (PART 3) as they are consistently valid in the assessment of threat for violence. At **FULL INQUIRY** however, greater detail, including from other contributor interviews / information is generated

INVESTIGATIVE THEMES		SIGNIFICANT FINDINGS
Motive: Does the student have motive(s) or grievances? <i>What first brought them to someone's attention?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Communications: Has the student engaged in concerning, or otherwise threatening communications suggesting ideas, intent, planning or preparation for violence?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Inappropriate Interests: Has the student shown any inappropriate interest in, fascination, and / or identification with other incidents of mass attacks or other acts of targeted violence?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Weapons Access: Does the student have (or are they developing) the capacity to carry out an act of targeted violence?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Stressors: Has, or is, the student experiencing stressful events, setbacks, challenges or losses or are there circumstances that may affect the likelihood of an escalation to violent behavior?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Desperation or Despair: Is the student experiencing hopelessness, desperation, and/or despair?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Mental Health Disorders and Developmental Issues: Does the student have a diagnosed mental health disorder or developmental issue or exhibit behaviors that suggest a mental health disorder or developmental issue?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Violence as an Option: Does the student see violence as an acceptable, desirable (only?) way to solve a problem?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Concerned Others: Are other people concerned about the student's potential for violence?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Planning and Capacity to Carry Out an Attack: Does the student have the ability, intent and will to plan and carry out an attack?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Consistency: Are the student's conversation and "story" consistent with his or her actions?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	
Protective Factors: Does the student have a positive, trusting, sustained relationship with at least one responsible person?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown	

FULL INQUIRY NOTES (Also refer to Appendix 1 for case formulation):

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FULL INQUIRY: THREAT CLASSIFICATION

<input type="checkbox"/> Low/Transient	<input type="checkbox"/> Moderate	<input type="checkbox"/> High	<input type="checkbox"/> Imminent/Direct Threat
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Has subsequent suicide risk been noted? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, DO NOT LEAVE THE STUDENT ALONE.	If YES: <ul style="list-style-type: none"> Continue with Full Inquiry and assessment of level of risk to others; <u>AND</u> RETURN to PART 4: THREAT TO SELF Act 71 Team / CRT coordinate with TAT
Are there STEP Concerns? <input type="checkbox"/> Yes <input type="checkbox"/> No	If NO, Return to Part 5: TRANSIENT THREATS
	If YES, Is this an Imminent/Direct Threat? <input type="checkbox"/> Yes <input type="checkbox"/> No
	If this is an IMMINENT/DIRECT THREAT, RETURN to PART 2
	If this is NOT an IMMINENT/DIRECT THREAT, Implement the Following: <ul style="list-style-type: none"> Individualized Management Plan (PART 7) Monitor and update the Plan as required Return to PART 3: TRIAGE: STEP CONCERNs to continue to monitor progress and screen suicide risk

FULL INQUIRY COMPLETED BY:

Name	Position	Signature	Date
------	----------	-----------	------

REVIEWED BY:

Name	Position	Signature	Date
------	----------	-----------	------

PART 7: CASE MANAGEMENT PLAN		
Student Name:	ID:	
INTERVENTION/TASK	PERSON RESPONSIBLE	DATE DUE
SUBJECT INTERVENTIONS: De-escalate, contain, or control the individual who may take violent action		
TARGET INTERVENTIONS: Decrease vulnerabilities of the target		
ENVIRONMENTAL INTERVENTIONS: Address environment and systems to discourage escalation		
PRECIPITATING EVENTS: Prepare and mitigate against precipitating events that may trigger adverse reactions		
DATE FOR NEXT REVIEW:		
Print Name of Team Leader:	Date:	
Signature of Team Leader:		

PART 7: CASE MANAGEMENT PLAN UPDATE		(To Be Updated Regularly While Case is Active)	
Student Name:		ID:	
INTERVENTION/TASK			
SUBJECT INTERVENTIONS: De-escalate, contain, or control the individual who may take violent action			
UPDATES:	SOURCE		
INTERVENTION/TASK		PERSON RESPONSIBLE	DATE DUE
TARGET INTERVENTIONS: Decrease vulnerabilities of the target			
UPDATES:	SOURCE		
INTERVENTION/TASK		PERSON RESPONSIBLE	DATE DUE
ENVIRONMENTAL INTERVENTIONS: Address environment and systems to discourage escalation			
UPDATES:	SOURCE		
INTERVENTION/TASK		PERSON RESPONSIBLE	DATE DUE

PRECIPITATING EVENTS: Prepare and mitigate against precipitating events that may trigger adverse reactions		
UPDATES:	SOURCE	
INTERVENTION/TASK	PERSON RESPONSIBLE	DATE DUE
COMMENTS (If CASE CLOSED, Include Reasons):		
DATE FOR NEXT REVIEW (or CASE CLOSED):		
Person Completing Update Form:	Date:	
Signature of Person Completing Form:		

CURRENT THREAT CLASSIFICATION			
<input type="checkbox"/> No Threat / Transient Threat	<input type="checkbox"/> Substantive Threat	<input type="checkbox"/> Imminent/Direct Threat	<input type="checkbox"/> Threat to SELF
CURRENT TRIAGE RECOMMENDATION:			
<input type="checkbox"/> No Threat/ Transient Threat: DOCUMENT & CLOSE CASE	<input type="checkbox"/> Continued Substantive Threat: SUSTAIN TAT CASE	<input type="checkbox"/> Imminent/Direct Threat INITIATE EMERGENCY OPERATIONS PLAN	<input type="checkbox"/> Threat to SELF REFERRAL(S) CLOSE CASE
REFERRALS:			

Appendix 1: STEP^{®1} CONCERNs

Targeted violence stems from an interaction among the subject(s), the target(s), the environment and the precipitating events. Continuously reflect on all parts of STEP to ensure vital information is not missed.

Use the following STEP[®] Concerns to guide case conceptualization for both TRIAGE and FULL INQUIRY.

STUDENT / SUBJECT OF CONCERN

The goal of threat assessment and management is to gain a holistic understanding of the subject of concern – the individual who might pose a threat of violence. This may be revealed by gathering information from school educational and discipline records, witnesses, social media posts, the individual themselves, and observations made by teachers, counselors, administrators, School Resource Officers or other Law Enforcement Officers and others who know the individual. Consider the following with regard to the subject:

- Self-perception, coping skills, mental health, response to rules and authority
- Exposure to or engagement in violence
- Access to and experience with weapons and motivation towards using violence as a means to solve problems
- Behavior(s) causing concern or impacting others
- Concerning communications and/or directly communicated threats
- Leakage behaviors: intentional or unintentional communication of intent to do harm
- Identified grievances and/or motives for violence; fixation on grievances or target(s)
- Pathway to violence behaviors: ideation/intent, planning, preparation (means, method, opportunity)
- Interest in or identification with perpetrators or violent acts
- Despondency, despair, isolation, difficulty coping, or suicidality
- Significant changes of behavior or mental health concerns
- Lack of protective factors

TARGET/OTHERS

The target may be an individual, a group of individuals or a location. In some cases, the relationship between a grievance and the target may be identified; however, in other cases it may be difficult or impossible to identify the relationship. Consider the following:

- The potential target and the factors that may increase or decrease their vulnerability for harm
- Are potential target(s) fearful of harm; does the subject present as a safety concern?

ENVIRONMENT (or SETTING)

A focus on the environment gives consideration to the context in which the individual is operating both in school and in the community. An understanding of the environments in which the individual exists, both in and out of school, is critical to determine the level of concern. Consider the following:

- School climate and culture (e.g., bullying, bias, poor conflict management, high rates of stress or violence, etc.)
- Social relationships, including adverse peer influences
- Family dynamics and relationships
- Lack of support, guidance, or resources at home, school and/or community

PRECIPITATING EVENTS (or SITUATION)

An understanding of the stressors affecting the individual of concern is an important step in assessing and managing the case. Stressors may be acute or chronic and can be anything in their life that causes them tension or worry. In general, the more stressors in a person's life, the more difficult it will be for them to cope. For this reason, an understanding of the individual's response to stressors is as important as identifying the stressors themselves. The threat assessment team must operate with the understanding that, in the face of multiple precipitating events, an individual's stress level may be such that they are vulnerable to a "last straw" or triggering event, an event which causes them to advance on the path to violence. Consider the following:

- Impending loss or failure or return to school after separation
- Key dates, events, triggers/reminders, or anniversaries of loss

¹ © Gene Deisinger and Marissa R. Randazzo, 2008.

APPENDIX 2 | THREAT CLASSIFICATIONS

Threat Classification – Level of concern a student may pose a risk for violence	Transient Threat or Substantive Threat? ³⁶ , ³⁷	Range of Potential Actions
<p>Low Risk Threat (Low Level of Concern): The individual/situation does not appear to pose a threat of violence or serious harm to self/others, and any exhibited issues/concerns can be easily resolved.</p>	<p>In most cases, unless there are other STEP©³⁸ concerns, Low Risk Threats (Low Level of Concern) would represent a Transient Threat. Examples include:</p> <ul style="list-style-type: none"> • Non-genuine expression; • Non-enduring intent to harm; • Temporary feelings of anger; • Tactic in argument; • Intended as joke or figure of speech; • Resolved on scene or in office (time-limited); and/or • Ends with apology, retraction, or clarification. <p>If in doubt, treat as Substantive.</p>	<p>Low Risk Threat (Low Level of Concern): Where threat / the level of concern is assessed as low, there will typically be no need to notify or take action to protect the person(s) to whom the threat was directed. Actions to address the situation might include, clarification, explanation, retraction, and/or an apology; potential disciplinary action; potential referral to school or community-based resources, as appropriate.</p>
<p>Moderate Risk Threat (Moderate Level of Concern): The individual/situation does not appear to pose a threat of violence or serious harm to self/others at this time but exhibits behaviors that</p>	<p>Threats classified as Moderate Risk (Moderate Level of Concern) or greater would represent a Substantive Threat. Examples of Substantive Threats will include</p>	<p>Moderate Risk Threat (Moderate Level of Concern): Where threat / the level of concern is assessed as moderate, response actions typically, would comprise notifying intended target(s) of threat and taking precautions to protect them. In addition: Taking steps to</p>

³⁶ Behavioral Threat Assessment and Management (BTAM): Best Practice Considerations for K–12 Schools; National Association of School Psychologists, www.nasponline.org, retrieved Feb 26, 2021. “A key distinction is the difference between **making a threat** and **posing a threat**. Schools serve students with a variety of developmental ages, disabilities, and emotional maturity levels. There are times when students may make a threat, but there is no genuine intent to harm. This type of threat may have been in response to a specific frustrating situation, stated as a sarcastic joke, or impulsive in nature with no intent to harm. The [Threat Assessment Team] needs to assess if the individual who made the threat “in the heat of the moment” wants to implement the threat. Previous research suggests that as many as 70% of threats may be transient (Cornell et al., 2004). When [Behavioral Threat Assessment and Management] is properly implemented, if the threat is identified as low level/minimal/transient it can often be resolved or managed through a problem-solving process or existing supports. Thus, while the individual of concern made a threat, they do not pose a threat, and this situation can be used as a learning opportunity or as an opportunity to increase supports.”

³⁷ Threat Assessment for School Administrators & Crisis Teams; *Ibid*.

³⁸ STEP© is a framework used to organize inquiry, assessment and management of threats by specific consideration of four domains: The Subject [of concern for risk for violence], Target, Environment and Precipitating Events.

Threat Classification – Level of concern a student may pose a risk for violence	Transient Threat or Substantive Threat? ^{36, 37}	Range of Potential Actions
indicate a continuing intent and potential for future violence or serious harm to self/others; and/or exhibits other concerning behavior that requires intervention.	<p>those where the following attributes may be present:</p> <ul style="list-style-type: none"> ▪ Specific and plausible details such as a specific victim, time, place, and method; ▪ Repeated over time or conveyed to differing individuals; ▪ Involves planning, substantial thought, or preparatory steps; ▪ Recruitment or involvement of accomplices; ▪ Invitation for an audience to observe threat being carried out; and/or ▪ Physical evidence of intent to carry out threat (e.g., lists, drawings, written plan). 	monitor and supervise the individual(s) who might pose a threat of violence, as well as providing support and taking disciplinary action, if needed. Potential referral to school or community-based resources, as appropriate should also be considered, for example, counseling, conflict mediation, or other interventions to reduce the threat of violence and address underlying conflicts or issues that lead to the threat.
<p>High Risk Threat (High Level of Concern): The individual/situation appears to pose a threat of violence, exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the plan; and may also exhibit other concerning behavior that requires intervention.</p>		<p>High Risk Threat (High Level of Concern): These cases include threatening behaviors indicating the intent, planning, or preparation to cause serious bodily injury or death (e.g., to rape, physically assault, and inflict serious injury, kill, or use weapons against self or others). Where threat / the level of concern is assessed as high, actions will comprise notifying local law enforcement and consulting with School Safety and Security officials. In other words, actions will include taking <i>immediate precautions to protect potential victims</i> (e.g., direct supervision of individual who might pose a threat of violence, notifying intended targets and caregivers, etc.); taking disciplinary action, as appropriate; and, where mental health or disability issues are reasonably believed to cause or contribute to violence risk, an assessment should be conducted by a qualified professional, such as a licensed psychologist.</p>
<p>Imminent Threat: An individual/situation appears to pose a</p>		<p>Imminent Threat: Where threat / the level of concern is assessed as imminent, <i>immediate containment and action</i></p>

Threat Classification – Level of concern a student may pose a risk for violence	Transient Threat or Substantive Threat? ^{36, 37}	Range of Potential Actions
<p>clear and immediate threat of serious violence toward others that requires containment and action to protect identified or identifiable target(s); and may also exhibit other concerning behavior that requires intervention.</p>		<p><i>to protect identified target(s) will be essential.</i> This will entail immediate referral to law enforcement and consultation with School Safety and Security personnel, as well as identifying Emergency Operations Plans and strategies to manage the active situation.</p>
<p>Direct Threat: An individual/situation poses a significant risk to the health or safety of themselves and/or others that cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of auxiliary aids or services. The direct threat standard applies when the Threat Assessment Team or school entity administration determines that an individual/situation poses a direct threat and that applicable disciplinary procedures are not available or sufficient to mitigate the threat.</p>		<p>Direct Threat: Where the subject/situation is assessed to present a direct threat, response actions would, in many cases, be the same as for students/situations assessed to pose a High or Imminent risk threat, with additional processes in place to permit exclusion of individual who might pose a threat of violence from school.</p>

APPENDIX 3 | ARTICLE XIII-E - THREAT ASSESSMENT OF JUNE 28, 2019

Section 1301-E. Definitions

The following words and phrases when used in this article shall have the meanings given to them in this section unless the context clearly indicates otherwise:

"Behavioral service providers." The term 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.

"Chief school administrator." A superintendent of a school district, executive director of an intermediate unit, administrative director of an area career and technical school or chief executive officer of a charter school, regional charter school or cyber charter school.

"Committee." The School Safety and Security Committee established under section 1302-B.

"County agency." The term includes, but is not limited to, a county children and youth agency, drug and alcohol service agency, behavioral or mental health agency or other human or social services agency.

"Law enforcement agency." As defined in section 1302-D.

"Safe2Say Program." The Safe2Say Program established under Article XIII-D.

"School entity." A school district, intermediate unit, area career and technical school, charter school, regional charter school or cyber charter school.

"School security personnel." A school police officer, school resource officer or school security guard appointed or employed under Article XIII-C.

"Student assistance program." As defined in 22 Pa. Code § 12.16 (relating to definitions).

"Team." A threat assessment team established by a school entity under section 1302-E(a).

Section 1302-E. Threat Assessment Teams

(a) Duties of school entities and chief school administrators: The following shall apply:

(1) Each school entity shall establish at least one team as provided under subsection (b) for the assessment of and intervention with students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others.

(2) Each chief school administrator or a designee, after consultation with the school entity's safety and security coordinator, shall:

(i) Appoint the members of the team and designate a member to serve as team leader.

(ii) Ensure and establish procedures for the implementation of this section.

(iii) Facilitate opportunities for members of the team to complete group or individual training consistent with nationally recognized best practices during paid working hours or as in-service training.

(iv) Ensure that students, school employees and parents and guardians are informed of the existence and purpose of the team. The information under this subparagraph shall be posted on the school entity's publicly accessible Internet website.

(v) Annually develop and present to the school entity's board of directors at an executive session a report generally outlining the school entity's approach to threat assessment. The report shall also be submitted to the school entity's school safety and security coordinator for inclusion in the required report under section 1309-B(c)(5) to the committee, which shall include:

- (A) A verification that the school entity is in compliance with this article.
- (B) The number and composition of established teams.
- (C) The total number of threats assessed in the school entity.
- (D) Any additional information determined by the chief school administrator or designee.

(vi) Annually present to the school entity's board of directors at an executive session the following:

- (A) A summary of interactions with outside law enforcement, juvenile probation and behavioral service providers.
- (B) An assessment of the operation of the school entity's teams.
- (C) Recommendations for improvement of the school entity's threat assessment processes.
- (D) Any additional information determined by the chief school administrator or designee.

(b) Team requirements: The following shall apply to teams established under subsection (a):

(1) Each team shall:

(i) Include individuals with expertise in:

- (A) School health.
- (B) Counseling, school psychology or social work.
- (C) Special education.
- (D) School administration.

(ii) Include:

- (A) The school safety and security coordinator appointed under section 1309-B or a designee.
- (B) Other school staff or community resources who may serve as regular team members or be consulted during the threat assessment process, as appropriate, and as determined necessary by the team, including:

- (I) School security personnel.
- (II) Law enforcement agency representation.

- (III) Behavioral health professionals.
- (IV) The individual identified by the school entity to receive reports from the Safe2Say Program.
- (V) An individual who serves on the student assistance program.
- (VI) Juvenile probation professionals.

(iii) Have a designated leader.

(iv) Be responsible, at a minimum, for the following:

- (A) Making age-appropriate informational materials available to students 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 their concerns, including through the Safe2Say Program.
- (B) Making informational materials available to 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 their concerns, including through the Safe2Say Program.
- (C) Ensuring that school employees are aware of the staff members who are appointed to the team and how to report threatening or at-risk behavior, including through the Safe2Say program.
- (D) Assisting in assessing and responding to reports received through the Safe2Say Program. Where a school entity has only one team, that team may also serve as the school entity's team for assessing and responding to reports received through the Safe2Say Program.
- (E) Assessing and responding to reports of students exhibiting self-harm or suicide risk factors or warning signs as provided for under section 1526.
- (F) Assessing, responding and making appropriate determinations and referrals under subsection (c) based on the information available to the team. The team, when appropriate, may coordinate with the student assistance program.
- (G) Providing required information to the chief school administrator or designee to make the report provided for under subsection (a)(2)(v).

(v) Ensure that parents and guardians are notified as provided under subsection (c).

(vi) Undergo training which shall address, at a minimum, the following:

- (A) Responsibilities of team members.

(B) The process of identifying, reporting, assessing, responding to and intervening with threats, including identifying and avoiding racial, cultural or disability bias.

(C) Confidentiality requirements under Federal and State law.

(2) The training required under this section shall be credited toward a professional educator's continuing professional education requirement under section 1205.2, any staff development requirements for paraprofessionals under 22 Pa. Code § 14.105 (relating to personnel), a school or system leader's continuing professional education requirement under section 1205.5 and the school safety and security training required under section 1310-B.

(3) A school entity may satisfy the requirements of subsection (a)(1) by assigning the duties listed under paragraph (1) to an existing team established by the school entity. For purposes of this paragraph, the existing team established may include, but is not limited to, the student assistance program.

(4) A team established by a school entity may serve one or more schools within the school entity.

(c) Notification and referral.--Upon a preliminary determination that a student's behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others, the following shall apply:

(1) The team shall immediately notify the chief school administrator or a designee, the student's building principal and the school safety and security coordinator. The building principal or designee shall then immediately notify the student's parent or guardian.

(2) Following notification of the parent or guardian, the team may refer the student, as appropriate, to:

- (i) a student assistance program;
- (ii) a law enforcement agency;
- (iii) an evaluation under the Individuals with Disabilities Education Act (Public Law 91-230, 20 U.S.C. § 1400 et seq.) or section 504 of the Rehabilitation Act of 1973 (Public Law 93-112, 29 U.S.C. § 701 et seq.);
- (iv) a student's existing individualized education program team established under the Individuals with Disabilities Education Act and 22 Pa. Code Ch. 14 (relating to special education services and programs); or
- (v) an existing team established to implement a student's section 504 service agreement established under section 504 of the Rehabilitation Act of 1973 and 22 Pa. Code Ch. 15 (relating to protected handicapped students).

(3) A parent or guardian shall provide consent prior to a team referring a student to:

- (i) a behavioral service provider;
- (ii) a health care provider; or

(iii) a county agency.

(4) Nothing in this section shall:

(i) Preclude school employees from acting immediately to address an imminent threat. Imminent threats and emergencies shall be promptly reported to a law enforcement agency.

(ii) Limit the responsibilities of school employees or other mandated reporters to report suspected child abuse as required by law.

(iii) Limit the authority of a school entity to refer a student to the student assistance program without referral by a team, so long as the student's behavior does not indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others.

(d) Access to student information. In order to carry out the duties under subsections (b) and (c) and facilitate the timely assessment of, and intervention with, students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others, a team shall have access to the following student information to the extent permissible under Federal law:

(1) Notwithstanding any provision of section 1409 to the contrary, student health records.

(2) Prior school disciplinary records.

(3) Records or information shared with the school entity under Article XIII-A and 42 Pa.C.S. § 6341(b.1) (relating to adjudication).

(4) Records of any prior behavioral or mental health or psychological evaluations or screenings maintained by the school entity.

(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 entity.

(e) Cooperation of county agency or juvenile probation department.--Notwithstanding 42 Pa.C.S. § 6352.2 (relating to interagency information sharing), upon a preliminary determination that a student's behavior indicates a threat to the safety of the student, other students, school employees, school facilities, the community or others, a 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 the preliminary determination. The county agency or juvenile probation department shall comply with the team's request except as prohibited by the following:

(1) 42 Pa.C.S. § 5944 (relating to confidential communications to psychiatrists or licensed psychologists).

(2) The act of February 13, 1970 (P.L.19, No.10), entitled "An act enabling certain minors to consent to medical, dental and health services, declaring consent unnecessary under certain circumstances."

(3) The act of July 9, 1976 (P.L.817, No.143), known as the Mental Health Procedures Act.

(4) The act of November 29, 1990 (P.L.585, No.148), known as the Confidentiality of HIV-Related Information Act.

(5) Federal law, including the Family Educational Rights and Privacy Act of 1974 (Public Law 90-247, 20 U.S.C. § 1232g), the Individuals with Disabilities Education Act, the Health Insurance Portability and Accountability Act of 1996 (Public Law 104-191, 110 Stat. 1936), and the procedures, limitations and criteria set forth in regulations adopted by the United States Department of Health and Human Services relating to the confidentiality of drug and alcohol treatment records.

(f) 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.

(g) Disclosure: The following shall apply:

- (1) 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.
- (2) 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.
- (3) School entities shall not be required to report any data on the functioning of the team other than specifically required under this article.

Section 1303-E. Threat Assessment Guidelines, Training and Information Materials

(a) Duties of committee: No later than 180 days from the effective date of this section, the committee shall:

- (1) Research, develop and publish best practices in implementing this article.
- (2) Develop and offer, at no charge to school entities through the Internet or other distance communications systems, all of the following:
 - (i) A model training program for members of teams that may be used and adapted by school entities and team members to meet the requirements of section 1302-E(b)(1).
 - (ii) A model training program for school employees, other than members of teams, that may be used and adapted by school entities to meet the requirements of section 1310-B(1).
 - (iii) Model, age-appropriate informational materials for students that may be used and adapted by school entities to meet the requirements of section 1302-E(a)(2)(iv) and (b)(1)(iv)(A).

- (iv) Model informational materials for parents and school employees that may be used and adapted by school entities to meet the requirements of section 1302-E(a)(2)(iv) and (b)(1)(iv)(B).
- (3) Develop model procedures and guidelines that school entities may use in implementing this article. The model procedures and guidelines shall, at a minimum:
 - (i) Establish standard definitions and terminology.
 - (ii) Reflect best practices in identifying, reporting, assessing and responding to threats, including threats reported through the Safe2Say Program, and coordinating with stakeholders.
 - (iii) Provide for flexibility and local decision-making and recognize the differing levels of available resources in each school entity.
 - (iv) Be posted on the Pennsylvania Commission on Crime and Delinquency's publicly accessible Internet website.
- (4) Comply with Federal and State student record confidentiality laws and regulations.
- (5) Provide guidance to teams for communications and coordination with student assistance program and individualized education program teams.
- (6) Annually review school entity threat assessment reports and use them when developing the requirements under this subsection.
- (7) Annually review the training programs, informational materials and model procedures and guidelines and make updates or revisions as necessary.
- (8) Notify school entities when the training programs, informational materials, model procedures and guidelines become available or are updated or revised.

APPENDIX 4 | ACTION STEPS TO ENHANCE THE APPROACH TO THREAT ASSESSMENT

Record Your Observations and Reflections

Throughout the training it is advised you note observations and reflections on what you are learning as it applies to your context. Ideas, innovations and contacts of your colleagues in the room can also be of great value in helping enhance how Threat Assessment is implemented in your context.

Use the  side of the sheet to note strengths and immediate opportunities.

Use the  side of the sheet to candidly note gaps or weaknesses in the current approach.

It may be helpful to organize your thinking by breaking down the topic of Threat Assessment into 'domains', such as:

Team expertise/ability to quickly draw in specialist expertise from school/district	Approach to Team training	Access to external support and advice	Approach to communicating with the wider school community on TA and the role of the Team
Clarity and coherence of TA process and documentation requirements	Clarity on permissibility and process of information sharing, disclosure and access to information held by 3 rd parties	Strength of relationships with key external stakeholders – Law Enforcement, Mental/Behavioral Health, CPS/Social Services	Knowledge of broad scope of interventions/case management approaches where risk for violence is identified

Record your Action Steps - things you/your Team can practically do to and commit to achieving a number of these – without being over-ambitious!



Action Steps