

BOARD OF EDUCATION OF HARFORD COUNTY

INFORMATIONAL REPORT

DECISION ON

**THREAT ASSESSMENT TEAM POLICY
POLICY NO. 02-0007-000**

AUGUST 12, 2019

Background Information:

The Board maintains a manual which sets forth the various policies of the Harford County Public Schools. The manual contains policies which are either required by federal and state law and regulation or which are, in the Board's judgment, necessary and appropriate for the school system to operate in a lawful, appropriate and effective manner. The following proposed, new policy is being presented to the Board for approval:

08-0010-000 Threat Assessment Team

Discussion:

At its July 15, 2019, Board meeting, the Board reviewed the proposed, new policy entitled 08-0010-000 Threat Assessment Team. Information regarding the Maryland Safe to Learn Act of 2018 was shared with the Board in a presentation by Mr. Bernard Hennigan, Executive Director of Student Services, and Ms. Kay Malone, Supervisor of School Counseling, in conjunction with Patrick P. Spicer, Esquire. The Maryland Safe to Learn Act of 2018, codified at Section 7-1501, *et. seq.*, of the Education Article of the Maryland Code, requires, among other things, that each local board of education adopt a threat assessment team policy on or before September 1, 2019.

Also at the July 15, 2019, Board business meeting, the Board voted unanimously to waive two days of the 30-day public comment period. The approval of the waiver permits the Board to take final action regarding this proposed policy, allowing the policy to be adopted before the September 1, 2019 timeline, in compliance with The Safe to Learn Act. The policy was posted for public comment and no comments were received.

The Superintendent recommends that the Board approve this proposed, new policy.

Attachments:

1. Proposed New Board Policy 08-0010-000 entitled Threat Assessment Team.

Superintendent's Recommendation:

For the foregoing reasons, the Superintendent recommends the following:

1. That the Board adopt the proposed new policy 08-0010-000 entitled Threat Assessment Team.

POLICY TITLE: THREAT ASSESSMENT TEAM		
ADOPTION/EFFECTIVE DATE:	MOST RECENTLY AMENDED:	MOST RECENTLY REAFFIRMED:
POLICY/PROCEDURE MANUAL SUMMARY CATEGORY: SAFETY AND SECURITY		

I. Purpose

The purpose of this policy is to set forth the Board’s commitment to implementation of the requirements of the Maryland’s Safe to Learn Act regarding Threat Assessment Teams.

II. Definitions

A. **Threat** means an expression of an intent to cause physical harm to someone. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means; and is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat or observed by or communicated to a third party; and regardless of whether the target of the threat is aware of the threat. Threats may be direct (“I am going to beat you up.”) or indirect (“I’m going to get him.”).

B. **Threat Assessment** means a comprehensive process emphasizing an appraisal of observed (or reasonably observable) behaviors to identify potentially dangerous or violent situations, to assess them, and to manage/address them.

C. **Threat Assessment Team (“TAT”)** means a team of school personnel that convene to identify, evaluate and address threats or potential threats to school security.

D. **Threat Assessment Tool** means the tool for mental health professionals to use in order to gather information regarding the transient or substantive nature of a threat to others.

E. **Trauma Response Manual (“TRM”)** means a set of guidelines or manual for student services staff and other school personnel to use in the prevention, intervention, and postvention of traumatic events and crises.

III. Statement of Policy

A. Threat Assessment Team (“TAT”) Composition

1. Every HCPS school shall have a TAT comprised of essential school staff, to include: an administrator, school nurse, PPW, school psychologist, and school counselor. Other staff may be on the team as appropriate. The principal of the school, or his/her designee, shall serve as the TAT leader.
2. If a threat being assessed involves special education students, a school staff member with expertise in special education shall be included on the TAT.

B. TAT Responsibilities

1. Provide guidance to students and staff regarding recognition of threatening behavior that may represent a threat to the community, school, or self;
2. Identify members of the school community to whom threatening behavior should be reported; and
3. Implement local school system policies for the assessment of and intervention with individuals whose behavior poses a threat to the safety of school staff or students. See Section III. G. below.
4. In cases where determined to be appropriate, assessment teams shall follow established procedures for referrals for evaluation or treatment. See Section III. G. below.
5. Regardless of threat assessment activities, disciplinary action and referral to law enforcement are to occur as required by local school system policies and regulations, the Maryland Code, and Code of Maryland Regulations (“COMAR”).
6. Teams shall meet at least quarterly.

C. Triage

1. When necessary, the TAT shall triage cases.
2. All team members shall have training as to how to effectively triage cases.

D. Assessing Threats

1. A school administrator and at least one student services staff member shall be notified of the threat, and, using the Threat Assessment Tool found in the TRM, the TAT shall determine if the threat is:

- a. transient or substantive; and,
- b. if the individual poses a threat of violence to themselves or others.

2. If a determination is made by the TAT that the threat is substantive, the TAT shall notify law enforcement in accordance with the HCPS critical incident response policy or plan.

3. If a determination is made by the TAT that the threat is transient, the TAT shall:

- a. Review the threatening behavior or communication
- b. Review school and other records for any prior history or interventions with the individuals involved.
- c. Conduct timely and thorough interviews (as necessary) of the person(s) who reported the threat, the recipient(s) or target(s) of the threat, other witnesses who have knowledge of the threat, and where reasonable, the individual(s) who allegedly engaged in the threatening behavior or communication. The purpose of the interviews is to evaluate the individual's threat in context, so that the meaning of the threat and intent of the individual can be determined.

4. If the TAT determines that the threat is transient and the threat assessment team determines that no further assessment, intervention, or monitoring is required at the time to prevent violence:

- a. The TAT team leader shall ensure that the incident and review is adequately documented consistent with local school system processes, forms and procedures. The TAT shall maintain the documentation in accordance with local school system policy, or as otherwise required by State law.
- b. If the individual (about whom the report was made) does not pose a threat but could benefit from or is in need of some additional assistance, the TAT leader shall ensure

that the individual is referred to the appropriate school or community-based resources.

- c. If the individual (about whom the report was made) has an Individualized Education Program (“IEP”) or 504 Plan, the need for a Functional Behavioral Assessment (FBA) should be considered. Based upon the FBA, a Behavior Intervention Plan (BIP) should be developed, if warranted.

E. Interventions, Monitoring, and Resolving Threats

1. If the TAT determines that an individual poses a threat of violence, the TAT shall develop, implement and monitor an individual plan to intervene regarding the threat and to address and reduce the threat.
2. The TAT, after a determination made in E (1) above, shall assist individuals within the school who engaged in threatening behavior or communication and any staff/students in accessing appropriate school and community-based resources for support or further intervention.
3. For each case, a member of the TAT shall be designated as a case manager to monitor the status of the individual of concern and to notify the TAT of any change in status, response to intervention/referrals or additional information that would be cause for reassessment and/or changes in intervention status. These status reviews shall be updated at least every 30 days until the individual is no longer assessed to pose a threat to the school or its staff.

F. Threat of Violence Accompanied by Threat of Self-Harm

1. If the TAT investigates someone who is threatening harm to others, the TAT shall also screen the individual for risk of self-harm and suicidal ideation.
2. Threats of self-harm or suicide unaccompanied by threats of harm to others shall be promptly evaluated pursuant to existing HCPS protocols as specified in the TRM.

G. In all cases of threats made by a student, the school administrator shall notify the parent/guardian of the student who made the threat and the parent/guardian of intended victims/targets.

H. Assessment Methodology

1. The following actions shall be undertaken in accordance with the provisions of the Manual:

- a. Method for identifying individuals whose behavior may pose a threat to the safety of an individual attending or working in a public school;
 - b. Method for the assessment of student behavior and interventions if student behavior poses a threat to the safety of an individual attending or working in a public school;
 - c. Method for the assessment of the behavior of an individual who is not a student at a public school but who may pose a threat to the safety of an individual attending or working in the public school;
 - d. Best practices for promoting communication and appropriate responses within a school community, including measures for;
 - (i) Training faculty, administrators, and staff to identify, properly respond to, and report threats or behaviors of concern that may pose a threat to the safety of an individual attending or working in a public school;
 - (ii) Teaching students to identify, and encouraging students to report, behaviors of concern exhibited by their peers or others that may pose a threat to the safety of an individual attending or working in a public school, including sharing thoughts about or plans for engaging in violence at the school; and
 - (iii) Increasing outreach to and the awareness of parents and guardians concerning the emotional and social health and well-being of students;
2. The Manual is incorporated herein as an attachment to this policy.
 - I. TAT members shall receive periodic training regarding implicit bias, disability and diversity training with special attention to racial and ethnic disparities.

Board Approval Acknowledged By:

Sean W. Bulson, Ed.D., Superintendent
Board of Education of Harford County

Policy Action Dates		
ACTION DATE	ACTION DATE	ACTION DATE

Responsibility for Policy Maintenance & References	
LAST EDITOR/DRAFTER NAME: Patrick P. Spicer, Esquire	JOB POSITION OF LAST EDITOR/DRAFTER: General Counsel
PERSON RESPONSIBLE: Bernard Hennigan	JOB POSITION OF PERSON RESPONSIBLE: Executive Director of Student Services
DESIGNEE NAME:	JOB POSITION OF DESIGNEE:
POLICY NUMBER PRIOR TO NOVEMBER 1, 2005:	

LEGAL REFERENCES¹

All references are set forth in the Policy.

¹ All references are to specific federal or Maryland statutes or regulations. References are provided for convenience and informational purposes only and are not to be considered as exhaustive or as precluding Harford County Public Schools from relying upon any other statutes or regulations in support of a policy.