

Book	Policy Manual
Section	200 Pupils
Title	Threat Assessment
Code	236.1
Status	First Reading

### **Purpose**

The Board is committed to protecting the health, safety and welfare of its students and the school community and providing the resources and support to address identified student needs. The Board adopts this policy to address student behavior that may indicate a threat to the safety of the student, other students, school employees, school facilities, the community and others.[1]

### **Authority**

The Board directs the Superintendent or designee, in consultation with the School Safety and Security Coordinator, to establish a threat assessment team and develop procedures for assessing and intervening with students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community and others.[1]

### **Definitions**

**Behavioral service providers** – includes, but is not limited to, a state, county or local behavioral health service provider, crisis intervention center or psychiatric hospital. The term includes a private service provider which contracts with a state, county or local government to act as a behavioral health agency.[2]

**Bias** – the attitudes or beliefs we have about a person or group that affects our understanding, actions and decisions in a conscious or subconscious manner.[3]

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

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

### **Delegation of Responsibility**

The Superintendent or designee, in consultation with the School Safety and Security Coordinator, shall appoint [1].

**[Note: districts should only select one of the appropriate options if the designated team is made up of required personnel under 24 P.S. 1302-E]**

{x } individuals to a threat assessment team at each school building in the district.

The Superintendent or designee shall designate a member of the team as team leader for the threat assessment team.[1]

The threat assessment team shall include the School Safety and Security Coordinator and individuals with expertise in school health; counseling, school psychology or social work; special education and school administration.[\[1\]](#)

{ x } members of the Student Assistance Program team.[\[4\]](#)

{ x } law enforcement agency representatives.

{ x } behavioral health professionals.

{ x } suicide prevention coordinators and/or members of the crisis response/crisis intervention team.[\[7\]](#)

{ x } The Superintendent or designee may assign additional staff members or designated community resources to the threat assessment team for assessment and response support.

The Superintendent or designee shall develop and implement administrative regulations to support the threat assessment process.

### **Guidelines**

#### Training

The

{ x } Superintendent or designee

{ x } School Safety and Security Coordinator

shall ensure that threat assessment team members are provided individual and/or group training **annually** on:[\[1\]](#)

1. Responsibilities of threat assessment team members.
2. Process of identifying, reporting, assessing, responding to and intervening with threats.
3. Identifying and avoiding racial, cultural or disability bias.[\[3\]](#)[\[8\]](#)
4. Confidentiality requirements under state and federal laws and regulations, and Board policies.[\[4\]](#)  
[\[6\]](#)[\[9\]](#)[\[10\]](#)[\[11\]](#)
5. { x } Student Assistance Program process.[\[4\]](#)
6. { x } Youth suicide awareness, prevention and response.[\[7\]](#)
7. { x } Trauma-informed approach.[\[12\]](#)
8. { x } Safe2Say Something procedures.[\[6\]](#)
9. { x } Multi-tiered systems of support.
10. { x } Positive Behavioral Intervention and Support.

Threat assessment team training shall be credited toward professional education requirements and school safety and security training requirements for staff, in accordance with applicable law and Board policy.[\[1\]](#)[\[6\]](#)[\[13\]](#)[\[14\]](#)[\[15\]](#)[\[16\]](#)

#### Information for Students, Parents/Guardians and Staff

The district shall **annually** notify students, staff and parents/guardians about the existence and purpose of the threat assessment team through posting information on the district website, publishing in handbooks and through other appropriate methods.[1]

The threat assessment team shall make available age-appropriate informational materials 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 concerns, including through the Safe2Say Something program and other district reporting hotlines or methods. Informational materials shall be available for review by parents/guardians.[1][7][8][17][18][19]

The threat assessment team shall make available informational materials for school employees regarding recognition of threatening or at-risk behavior that may present a threat to the student, other students, school employees, school facilities, the community or others and how to report concerns, including through the Safe2Say Something program and other district reporting hotlines or methods. Information for school employees shall include a list of the staff members who have been appointed to the threat assessment team.[1][7][8][17][19]

**The district shall annually provide mandatory training for school staff on identification or recognition of student behavior that may indicate a threat to the safety of the student, other students, school employees, other individuals, school facilities or the community, in accordance with law, Board policy and the standards specified by the state's School Safety and Security Committee.[6][15]**

#### Reporting and Identification

The threat assessment team shall document, assess and respond to reports received regarding students whose behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others.[1]

The threat assessment team shall assist in assessing and responding to reports that are received through the Safe2Say Something Program identifying students who may be a threat to themselves or others.[1][6]

The threat assessment team shall assist in assessing and responding to reports of students exhibiting self-harm or suicide risk factors or warning signs, as identified in accordance with applicable law and Board policy.[1][7]

When the threat assessment team has made a preliminary determination that a student's reported behavior may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others, the team shall immediately take the following steps:[1]

1. Notify the Superintendent or designee and School Safety and Security Coordinator of the reported threat.
2. Notify the building principal of the school the student attends of the reported threat, who shall notify the student's parent/guardian of the reported threat.

When a reported student's behavior indicates that there may be an imminent threat to the safety of the student or others, or an emergency situation, a threat assessment team member shall take immediate action, which may include promptly reporting to the appropriate law enforcement agency and school administration.[1][5][6][20]

Where a threat assessment team member has reasonable cause to suspect that a reported situation indicates that a student may be a victim of child abuse, the member shall make a report of suspected child abuse in accordance with law and Board policy.[1][21][22]

#### Inquiry and Assessment

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

1. Discrimination/Title IX Sexual Harassment.[8][17]
2. Bullying/Cyberbullying.[19]
3. Suicide Awareness, Prevention and Response.[7]
4. Hazing.[23]
5. Dating Violence.[24]

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

1. {x } Interviewing the student, other students, staff, parents/guardians or others regarding the subject(s) of the reported threat.
2. {x } Reviewing existing academic, health and disciplinary records and assignments, as appropriate, regarding the subject(s) of the report.
3. {x } Conducting searches of lockers, storage spaces, and other possessions on school property as applicable, in accordance with applicable law, regulations and Board policy.[25]
4. {x } Examining outside resources such as social media sites, in coordination with law enforcement, or contacting law enforcement, juvenile probation, or community agencies to request additional information about the subject(s) of the report, in accordance with law, regulations and Board policies.
5. {x } Where appropriate, convening the appropriate team to assess and/or address the situation that is the subject of the report, such as the Individualized Education Program (IEP) team, Section 504 Team, Behavior Support team, Student Assistance Program team, or others.[4][26][27][28][29][30]

The threat assessment team shall establish and implement procedures, in accordance with the district's Memorandum of Understanding, to address situations where the investigation of a reported threat shall be transferred to the appropriate law enforcement agency.[5][20]

The threat assessment team may request that the county agency or juvenile probation department consult and cooperate with the team in assessing the student who is the subject of a preliminary determination regarding a threat.[1]

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

### Response and Intervention

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

Following notification to the student's parent/guardian, the threat assessment team may refer the student to an appropriate program or take action to address the reported situation in accordance with applicable Board policy, which may include, but is not limited to:[\[1\]](#)

1. A referral to the Student Assistance Program.[\[4\]](#)
2. A referral to the appropriate law enforcement agency.[\[5\]](#)[\[6\]](#)[\[20\]](#)
3. An appropriate evaluation to determine whether the student is a qualified student with a disability in need of a Section 504 Service Agreement or in need of special education services through an Individualized Education Program (IEP), in accordance with applicable law and Board policy.[\[26\]](#)[\[27\]](#)[\[30\]](#)
4. A referral to the student's IEP Team to review and address the student's IEP and/or Positive Behavior Support Plan. This could include, but is not limited to, a manifestation determination or functional behavioral assessment in accordance with applicable law, regulations and Board policy.[\[27\]](#)[\[28\]](#)[\[29\]](#)[\[30\]](#)
5. A referral to the student's Section 504 Team to review and address the student's Section 504 Service Agreement and/or Positive Behavior Support Plan.[\[26\]](#)
6. With prior parental consent, a referral to a behavioral service provider, health care provider or county agency.[\[31\]](#)
7. Addressing behavior in accordance with applicable discipline policies and the Code of Student Conduct.[\[32\]](#)[\[33\]](#)[\[34\]](#)[\[35\]](#)
8. Ongoing monitoring of the student by the threat assessment team, a child study team, Student Assistance Program team or other appropriate school personnel.
9. Taking steps to address the safety of any potential targets identified by the reported threat.[\[6\]](#)[\[36\]](#)

#### *Safe Schools Incident Reporting –*

For Safe Schools reporting purposes, the term **incident** means an instance involving an act of violence; the possession of a weapon; the possession, use or sale of a controlled substance or drug paraphernalia as defined in the Pennsylvania Controlled Substance, Drug, Device and Cosmetic Act; the possession, use or sale of alcohol or tobacco; or conduct that constitutes an offense listed under the Safe Schools Act.[\[20\]](#)[\[37\]](#)[\[38\]](#)[\[39\]](#)

When a reported threat also meets the definition of an incident under the Safe Schools Act, in accordance with reporting requirements, the Superintendent or designee shall immediately report required incidents, if not previously reported by district staff, and may report discretionary incidents committed by students on school property, at any school-sponsored activity or on a conveyance providing transportation to or from a school or school-sponsored activity to the local police department that has jurisdiction over the school's property, in accordance with state law and regulations, the procedures set forth in the Memorandum of Understanding with local law enforcement and Board policies.[\[20\]](#)[\[32\]](#)[\[37\]](#)[\[38\]](#)[\[40\]](#)[\[41\]](#)[\[42\]](#)

The Superintendent or designee shall notify the parent/guardian, if not previously notified by district staff, of any student directly involved in an incident on school property, at any school-sponsored activity or on a conveyance providing transportation to or from a school or school-sponsored activity, who is a victim or suspect, immediately, as soon as practicable. The Superintendent or designee will inform the parent/guardian whether or not the local police department that has jurisdiction over the school property has been or may be notified of the incident. The Superintendent or designee will document attempts made to reach the parent/guardian.[\[20\]](#)[\[38\]](#)[\[43\]](#)

#### *Students With Disabilities –*

When reporting an incident committed by a student with a disability or referring a student with a disability to a law enforcement agency, the district shall provide the information required by state and federal laws and regulations and shall ensure that copies of the special education and disciplinary records of the student are transmitted for consideration by these authorities. The district shall ensure compliance with the Family Educational Rights and Privacy Act when transmitting copies of the student's special education and disciplinary records.[9][11][44][45][46][47]

### Monitoring and Management

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

The threat assessment team, in coordination with other appropriate teams and supports, shall determine when the student's Individualized Management Plan is no longer needed for disposition of the threat(s), and may transfer appropriate information in accordance with applicable law, regulations and Board policy.[4][7][9][11][26][27]

### Records Access and Confidentiality

In order to carry out their duties and facilitate the timely assessment of and intervention with students whose behavior may indicate a threat, the threat assessment team shall have access to the following student information to the extent permitted under applicable law and regulations:[1]

1. Student health records.[48][49]
2. Prior school disciplinary records.[9][11][50]
3. Records related to adjudication under applicable law and regulations.[50][51][52][53][54][55]
4. Records of prior behavioral or mental health or psychological evaluations or screenings maintained by the district.
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 district.

The threat assessment team shall use all information or records obtained in fulfilling the team's duty in accordance with law to evaluate a threat or to recommend disposition of a threat. Team members shall not redisclose any record or information obtained or otherwise use any record of a student beyond the purpose for which the disclosure was made to the team, in accordance with law.[1]

The threat assessment team shall maintain confidentiality and handle all student records in accordance with applicable law, regulations, Board policy, the Student Records Plan and the district's legal and investigative obligations.[4][7][9][10][11][19][44][46][50][56]

Threat assessment members whose other assignments and roles require confidentiality of specific student communications, in accordance with law, shall ensure that all confidential communications and information are addressed in accordance with applicable law, regulations, Board policy and administrative regulations.[10][57][58][59][60]

### Annual Board Report

The threat assessment team shall provide the required information to the Superintendent, in consultation with the School Safety and Security Coordinator, to annually develop and present to the Board, at an executive session, a report outlining the district's approach to threat assessment, which shall include:[1]

1. Verification that the district's threat assessment team and process complies with applicable law and regulations.

2. The number of threat assessment teams assigned in the district, and their composition.
3. The total number of threats assessed that year.
4. A summary of interactions with outside law enforcement agencies, juvenile probation and behavioral service providers.
5. An assessment of the district's threat assessment team(s) operation.
6. Recommendations for improvement of the district's threat assessment processes.
7. Any additional information required by the Superintendent or designee.

{ x} The annual threat assessment report shall be presented as part of the annual report to the Board by the School Safety and Security Coordinator on district safety and security practices.[\[1\]](#)[\[5\]](#)

The threat assessment team's information addressing verification of compliance with law and regulations, the number of threat assessment teams assigned in the district and their composition, the total number of threats assessed that year, and **additional** information required by the Superintendent or designee shall be included in the School Safety and Security Coordinator's annual report on district safety and security practices that is submitted to the state's School Safety and Security Committee.[\[1\]](#)[\[5\]](#)[\[61\]](#)

## PSBA Revised 8/22 © 2022 PSBA

### Legal

[1. 24 P.S. 1302-E](#)

[2. 24 P.S. 1301-E](#)

3. Pol. 832

4. Pol. 236

5. Pol. 805.2

6. Pol. 805

7. Pol. 819

8. Pol. 103

9. Pol. 113.4

10. Pol. 207

11. Pol. 216

12. Pol. 146.1

[13. 24 P.S. 1205.2](#)

[14. 24 P.S. 1205.5](#)

[15. 24 P.S. 1310-B](#)

16. Pol. 333

17. Pol. 104

18. Pol. 105.1

19. Pol. 249

20. Pol. 805.1

[21. 23 Pa. C.S.A. 6311](#)

22. Pol. 806

23. Pol. 247  
24. Pol. 252  
25. Pol. 226  
26. Pol. 103.1  
27. Pol. 113  
28. Pol. 113.1  
29. Pol. 113.2  
30. Pol. 113.3  
31. Pol. 146  
32. Pol. 218  
33. Pol. 218.1  
34. Pol. 218.2  
35. Pol. 233  
36. Pol. 709  
[37. 24 P.S. 1303-A](#)  
[38. 22 PA Code 10.2](#)  
[39. 35 P.S. 780-102](#)  
[40. 24 P.S. 1302.1-A](#)  
[41. 22 PA Code 10.21](#)  
[42. 22 PA Code 10.22](#)  
[43. 22 PA Code 10.25](#)  
[44. 20 U.S.C. 1232g](#)  
[45. 20 U.S.C. 1415](#)  
[46. 34 CFR Part 99](#)  
[47. 34 CFR Part 300](#)  
[48. 24 P.S. 1409](#)  
49. Pol. 209  
50. Pol. 216.1  
[51. 24 P.S. 1304-A](#)  
[52. 24 P.S. 1305-A](#)  
[53. 24 P.S. 1307-A](#)  
[54. 42 Pa. C.S.A. 6341](#)  
55. Pol. 218.3  
[56. 24 P.S. 1304-D](#)  
[57. 22 PA Code 12.12](#)  
[58. 42 Pa. C.S.A. 5945](#)  
[59. 42 Pa. C.S.A. 8337](#)  
[60. 42 CFR Part 2](#)  
[61. 24 P.S. 1309-B](#)  
[20 U.S.C. 1400 et seq](#)



[35 P.S. 7601 et seq](#)

Pol. 203.1

[PA Commission on Crime and Delinquency, School Safety and Security Committee Model K-12 Threat Assessment Procedures and Guidelines](#)

Behavioral Threat Assessment Management (BTAM) Protocol - 4-26-2023.docx (61 KB)

# Wellsboro Area School District Behavioral Threat Assessment & Management (BTAM) Protocol

April 2023

## Proactive Measures

The following procedures refer to a multidisciplinary team known as the BTAM team. The Behavioral Threat Assessment Management Team should be pre-determined for each building so that the team can be quickly assembled for group consultation when the needs arise.

The core BTAM team should consist of 3-5 school personnel such as a school administrator, at least one school psychologist, the special education director, and *in moderate to high-risk scenarios* a law enforcement consultant from a local or state police agency.

Before initiating the following protocol: first, ensure that the student or students who *made* the threatening comment are accounted for with **immediate staff supervision**.

**1. Consult with a school psychologist to evaluate *the specific threat, comment, behavior, or gesture that was made* by the student. The threat will be classified as either Transient or Substantive<sup>1</sup>.**

The following tool will help with the initial evaluation of the student's threat. Substantive threats made *in conjunction with* other social risk factors or warning signs should elicit higher levels of concern. If it is unclear to the administrator whether a threat is transient or substantive, other members of the Behavioral Threat Assessment Management (BTAM) team should be consulted. Profiling the student based on how they *seem* as opposed to what they *did or said* is NOT effective in preventing school violence. Contrarily, profiling students may create harm by unjustly incriminating a student or obstructing their access to education.



2. **Gather more information about the student and their legal rights<sup>2</sup>.** Then consider whether or not immediate suspension is necessary.

**IF A STUDENT HAS AN IEP**, then immediate suspension may be in **violation** of their legal rights. Disciplinary action cannot override the content within a student's IEP without a Manifestation Determination meeting.

If a student with an IEP requires disciplinary action that involves a change in placement that is longer than 10 days, a **Manifestation Determination** meeting must be scheduled as soon as possible.

**If the student is to remain in school**, additional recommendations must be created by the team to ensure the safety of the school population.

### **3. Initiate Threat Assessment Procedures**

We know the student has made a threat – threat assessment procedures serve to evaluate the entire situation to determine if the student *poses* a threat. The school psychologist will conduct a comprehensive interview with the student using the district threat assessment protocol.

Situational risk and protective factors related to the student should also be assessed by the school psychologist and discussed with the team.

School mental health personnel should always maintain appropriate documentation for review following the implementation of the threat assessment interview.

After concluding a threat assessment, the school psychologist who conducted the assessment will contact the student's parents to inform them of the situation, our procedures, and the outcome of the assessment.

### **4. Assemble the district's multidisciplinary threat assessment team to review the content of the interview.**

A team of at least 3-5 school personnel and at least 1 school psychologist should be assembled. The team should review the threats that were made, the content of the interview(s), and any other relevant documentation to determine the *approximate level of threat* posed by the student.

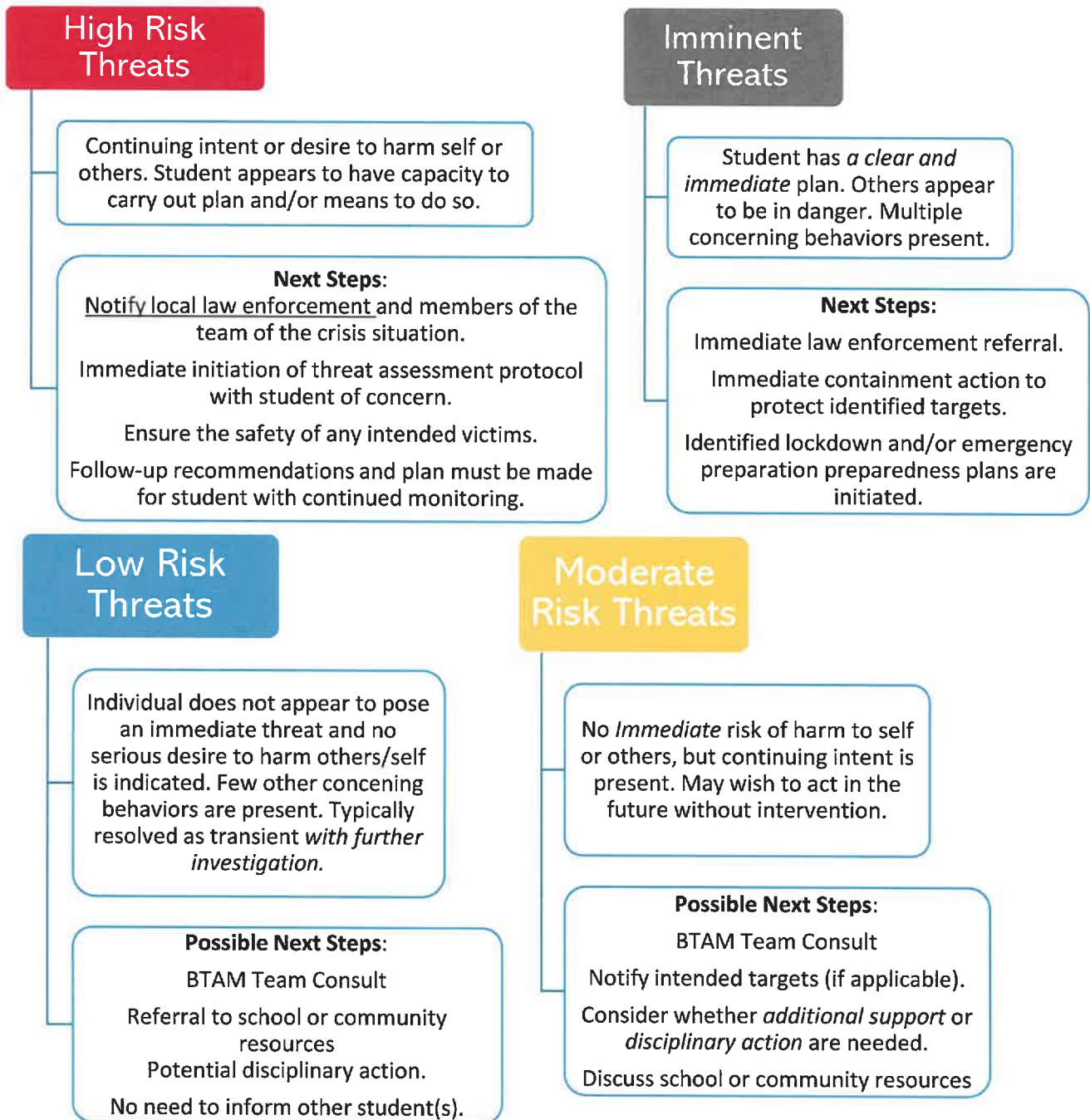
Per Article XIII-E of PA Public School Code, members of the threat assessment team may also review the following documents **privately** during their decision-making process:

- Student health records
- Disciplinary records
- Records or info shared with the school related to adjudication
- Any prior behavioral, 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 the student.

To protect the rights of our students, this information should be *exclusive* to the members of the BTAM team.

**5. Determine the Approximate Level of Threat posed by the student. Classify the level of threat as a team.**

See the attached decision-making tree adapted from Pennsylvania’s Model K-12 Threat Assessment Procedures and Guidelines (Pennsylvania Commission on Crime and Delinquency, 2019). **Students who have made a clearly stated written or verbal threat should immediately be considered high-risk.**



**6. Create follow-up recommendations for the student of concern at school. Determine appropriate disciplinary action in relevant cases. If a student has an IEP or school accommodations, a follow-up meeting will take place with the IEP team.**

**Follow-up Recommendations for the BTAM Team’s Consideration**

- Safety Checks such as backpack or locker checks
- Outpatient Counseling and/or psychiatric referrals
- Alternative Placement within the school building
- Discussion of at-home interventions with parents such as securing lethal means, limiting access to certain content at home, and close monitoring of the student.
- Inpatient Mental Health Intervention may be recommended in severe instances
- Amendments to interventions already described in the student’s IEP
- Following up with school-based or community resources such as individual or group counseling, Big Brothers and Big Sisters, CONCERN, or any others that may appear suitable.

Ensure that members of the team such as the school psychologist and one building administrator schedules follow-up correspondence with the student and their family. If necessary, the team may need to meet again in the future to discuss the student’s recommendations and their implementation. Adjustments may be made to the student’s behavioral management plan as necessary.

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Frameworks cited within document

1. Deisinger, G. Virginia Department of Criminal Justice Services (2020). *Threat Assessment and Management in Virginia Public Schools: Model Policies, Procedures and Guidelines: Third Edition.*
2. Reeves, M., & McCarthy, C. (2021). *Upholding Student Civil Rights and Preventing Disproportionality in Behavioral Threat Assessment and Management (BTAM).* National Association of School Psychologists.
3. Charles, R.H., Pennington, M. Pennsylvania Commission on Crime and Delinquency (2019). *Model K-12 Threat Assessment Procedures and Guidelines.*

**Other Helpful Links:**

**Safe2Say Something Portal – An anonymous reporting system for school personnel. This may be used by school staff to submit information regarding threats made at school.**

<https://www.safe2saypa.org/>

**Pennsylvania Threat Assessment Implementation Resources:**

<https://www.pccd.pa.gov/schoolsafety/Pages/Threat-Assessment.aspx>

**National Association of School Psychologists (NASP) Threat Assessment Resources:**

<https://www.nasponline.org/resources-and-publications/resources-and-podcasts/school-safety-and-crisis/systems-level-prevention/threat-assessment-at-school>