

## PROGRAM-BASED THREAT ASSESSMENT

The Board is committed to providing a safe and secure learning environment for students and staff. This policy establishes a program-based threat assessment program to provide for timely and methodical program-based threat assessment and management.

Threat assessment best occurs in program climates of safety, respect, and emotional support. Student behavior, rather than a student's demographic or personal characteristics, will serve as the basis for a program-based threat assessment.

The threat assessment process is distinct from student discipline procedures. The mere fact that the NWESD 189 is conducting a threat assessment does not by itself necessitate suspension or expulsion, and the NWESD 189 will not impose suspension or expulsion, including emergency expulsion, solely for investigating student conduct or conducting a threat assessment. Further, suspension, or other removal from the program environment can create the risk of triggering either an immediate or a delayed violent response, unless such actions are coupled with containment and support. However, nothing in this policy precludes NWESD 189 personnel from acting immediately to address an imminent threat, including imposing an emergency expulsion, if the NWESD 189 has sufficient cause to believe that the student's presence poses an immediate and continuing danger to other students or program personnel or an immediate and continuing threat of material and substantial disruption of the educational process.

### **Structure of Threat Assessment Teams**

The Superintendent shall establish and ensure the training of a multidisciplinary, multiagency threat assessment team or more than one such team to serve NWESD 189 programs. As the threat assessment team must be multidisciplinary and multiagency, it might include persons with expertise in:

- Counseling, such as a program counselor, a program psychologist and/or program social worker,
- Law enforcement, such as a program resource officer,
- Program administration, such as a program administrator or other senior administrator,
- Other NWESD 189 or program staff,
- Community resources,
- Special education teachers, and a
- Practicing educational staff member.

Not every multidisciplinary team member need participate in every threat assessment. When faced with a potential threat by, or directed towards, a student receiving special education services, the threat assessment team must include a team member who is a special education teacher.

Although parents, guardians, or family members are often interviewed as part of the threat assessment process, neither the student nor the student's family members are part of the threat assessment team. This does not diminish the NWESD 189's commitment that program personnel will make every reasonable attempt to involve parents and the student in the resolution of the student's behavioral violations, consistent with Policy and Procedure 3241 – Student Discipline.

### **Function of Threat Assessment Team**

Each threat assessment team member, whether a teacher, counselor, program administrator, other program staff, contractor, consultant, volunteer, or other individual, functions as a “program official with a legitimate educational interest” in educational records controlled and maintained by the NWESD 189. The NWESD 189 provides the threat assessment team access to educational records as specified by the Family Educational Rights and Privacy Act (FERPA). No member of a threat assessment team, including NWESD 189 / program-based members and community resource / law enforcement members, shall use any student record beyond the prescribed purpose of the threat assessment team or re-disclose records obtained by being a member of the threat assessment team, except as permitted by FERPA.

The threat assessment team:

- 1) Identifies and assesses the behavior of a student that is threatening, or potentially threatening, to self, other students, staff, program visitors, or program property. Threats of self-harm or suicide unaccompanied by threats of harm to others should be promptly evaluated according to Procedure 3246-P – Procedure for Restraint, Isolation, and Other Use of Reasonable Force.
- 2) Gathers and analyzes information about the student’s behavior to determine a level of concern for the threat. The threat assessment team may conduct interviews 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 to determine the meaning of the threat and intent of the individual. The threat assessment team may request and obtain records in the NWESD 189’s possession, including student education, health records, and criminal history record information. The purpose of obtaining information is to evaluate situational variables, rather than the student’s demographic or personal characteristics.
- 3) Determines the nature, duration, and level of severity of the risk and whether reasonable modifications of policies, practices, or procedures will mitigate the risk. The threat assessment team will not base a determination of threat on generalizations or stereotypes. Rather, the threat assessment team makes an individualized assessment, based on reasonable judgment, best available objective evidence, or current medical evidence as applicable;
- 4) Communicates lawfully and ethically with each other, program administrators, and other program staff who have a need to know particular information to support the safety and well-being of the program, its students, and its staff; and
- 5) Timely reports its determination to the Superintendent or designee.

Depending on the level of concern determined, the threat assessment team develops and implements intervention strategies to manage the student’s behavior in ways that promote a safe and supportive teaching, and learning environment, without excluding the student from the program.

In cases where the student whose behavior is threatening or potentially threatening also has a disability, the threat assessment team aligns intervention strategies with the student's individualized education program (IEP) or the student's plan developed under section 504 of the rehabilitation act of 1973 (section 504 plan) by coordinating with the student's IEP team or section 504 plan team. Although some of the functions of a program-based threat assessment may run parallel to the functions of a student's IEP team or 504 plan team, program-based threat assessments remain distinct from those teams and processes.

### **Data Collection, Review and Reporting**

The Superintendent or designee shall establish procedures for collecting and submitting data related to the program-based threat assessment program that comply with OSPI's monitoring requirements, processes, and guidelines.

### **Other tasks of threat assessment team**

The threat assessment team may also participate in other tasks that manage or reduce threatening or potentially threatening behavior and increase physical and psychological safety. This may include:

- 1) Providing guidance to students and staff regarding recognition of behavior that may represent a threat to students, staff, program, the community, or the individual;
- 2) Providing informational resources for community services boards or health care providers for medical evaluation or treatment, as appropriate;
- 3) Assessing individuals other than students whose behavior poses a threat to the safety of students or staff and notify the Superintendent or designee of such an individual.

First Reading: 02/26/2020

Second Reading: 03/25/2020

Reference:

Chapter 28A.300 RCW

Chapter 28A.320 RCW

CFR 34, Part 99

Cross Reference:

Policy 2161

Policy 2162

Policy 3144

Policy 3231

Policy 3241

Policy 4210

Policy 4310

Policy 6510