
THREAT MANAGEMENT POLICY AND PROCEDURES

Introduction

The primary purpose of threat management is to identify individuals exhibiting threatening or other concerning behavior, assess the risk of harm, and coordinate appropriate interventions and services for such individuals. The FAU Lab School's threat management process is a systematic, fact-based method designed to identify, using threat assessment protocols, whether behaviors or communications constitute a concern for violence or harm to another person. Florida Harm Prevention and Threat Management Model (Florida Model) is designed to identify, assess, manage, and monitor threats to schools, school staff, and students. The goal of the threat management process is to prevent violence or harm to members of the school community. The threat management process uses a methodology that identifies students exhibiting threatening or other concerning behavior, gathers information to assess the risk of harm to themselves or others, and identifies appropriate interventions to prevent violence and promote successful outcomes.

Definitions

For the purposes of this policy, the following definitions shall apply (definitions denoted with a "+" are adopted as provided in Florida Statutes, the Florida Administrative Code, and the Florida Department of Education, Office of Safe Schools' Florida Harm Prevention and Threat Management Manual.

1. **+Concerning Behavior:** An observable behavior that elicits concern in others regarding the safety of an individual or those around them. Important to determining whether behavior is concerning is whether it deviates from the person's baseline behavior. Some concerning behavior for one person may be "normal" behavior for another person. Concerning behavior is a spectrum that can include lower-level concerns, such as unusual interests in violent topics, conflicts or grievances between classmates, increased anger, increased substance use, or other noteworthy changes in behavior (e.g., depression or withdrawal from social activities), and prohibited behaviors that are objectively concerning and should trigger an immediate response, such as threats, weapons violations, and other aggressive or violent behaviors.
2. **+Concerning Communication:** Unusual, bizarre, threatening, or violent communications made by an individual or group. Concerning communications may include explicit threats or allude to violent intentions; violence as a means to solve a problem; justification of violent acts; unusual interest in weapons; personal grievances; or other inappropriate interests. Concerning communications may be expressed verbally, visually, in writing, electronically, or through other means. Concerning communications may be considered threatening, even if they do not involve a direct and explicit threat of violence. Concerning communications may also allude to hopelessness or suicide.
3. **+Education Records:** Any records or documents, including information derived from those records or documents, that are directly related to a student and are maintained by an educational agency or institution, or by a party acting for the agency or institution. In most

THREAT MANAGEMENT POLICY AND PROCEDURES

cases, this includes student health and mental health records maintained by an educational agency or institution. Law enforcement unit records, as defined by 34 C.F.R. ss. 99.3 and 99.8, are not considered education records.

4. **+Florida Harm Prevention and Threat Management Model** or “Florida Model” means the Florida-specific behavioral threat management process required by Section 1001.212(12), Florida Statutes. The Florida Model consists of the Florida Harm Prevention and Threat Management Manual and the Florida Harm Prevention and Threat Management Instrument (“Instrument”). Under the Florida Model, threats and reports of concerning behavior or concerning communications are categorized as having a low, medium, or high level of concern.
5. **+Imminent Threat:** An imminent threat exists when a situation, including the person’s prohibited objective behavior, poses a clear and immediate threat of serious violence toward self or others that requires containment and immediate action to protect an identified or identifiable target.
6. **Individuals with Disabilities Education Act (IDEA):** The IDEA is a federal law that makes an appropriate, free public education available to eligible children with disabilities and ensures that special education and related services are provided to those children.
7. **Individualized Education Plan (IEP):** A written plan for each child eligible under the IDEA that governs how the district will educate that student. The parents, student (if appropriate) and a team of educators and professionals, known as the IEP team, develop the IEP detailing education and related services the student will receive and outlines required modifications, accommodations and behavioral interventions.
8. **+Level of Concern:** The classification of an individual is based on their presenting risk and needs and balanced against protective factors. Levels of concern (also called threat levels) are classified as Low, Medium, or High.
 - a. **+Low Level of Concern:** A Low level of concern designation is appropriate where a person poses a threat of violence or exhibits other concerning behavior that is minimal and it appears that any underlying issues can be resolved easily. This level means the concern for future violence toward another person is low. There may nonetheless be significant concerns about the person but at that time, the concern for violence toward another is at the low end of the spectrum.
 - b. **+Medium Level of Concern:** A Medium level of concern designation is appropriate where the person does not appear to pose an immediate threat of violence, but the person exhibits behaviors that indicate a potential intent to harm or exhibits other concerning behavior that requires intervention. This level suggests that violence toward another may occur, and although the situation is not urgent, violence cannot be ruled out. The threat management team may not have complete or completely accurate information to guide the outcome of the assessment.

THREAT MANAGEMENT POLICY AND PROCEDURES

- c. **+High Level of Concern:** A High level of concern designation is appropriate where the person poses a threat of violence, exhibits behaviors that indicate both a continuing intent to harm and an effort to acquire the capacity to carry out a plan, and may also exhibit other concerning behavior that requires immediate intervention and protective measures for the target. This level suggests the student of concern is reaching a critical point on the pathway to violence from which they perceive it may be difficult to turn back. A High level of concern requires immediate and continuing attention from threat management resources to ensure violence does not occur.
9. **+Reasonable effort to notify** means the exercise of reasonable diligence and care by the principal or designee to make contact with the student’s parent/legal guardian, or other known emergency contact whom the student’s parent/legal guardian has authorized to receive notifications. A reasonable effort to notify includes, at minimum, the principal or designee using available methods of communication to contact the student’s parent/legal guardian, or other known emergency contact including, but not limited to, telephone calls, text messages, e-mails, and voicemail messages.
10. **Student of Concern:** Any student reported to the Chair, Vice Chair, School-Based Threat Management Team (SBTMT) or District Threat Management Team (DTMT) who exhibits any behavior or communication that may constitute a threat or concern regarding school safety.
11. **Student Support Management Plan (SSMP):** The Student Support Management Plan (SSMP) uses direct and indirect interventions to help create an environment less likely to produce violence. The SSMP is implemented by the threat management team imposing requirements on the student. Under the SSMP, a student of concern may be required to refrain from certain conduct or may be required to engage in certain actions that are designed to prevent harm to others. The SSMP is established for a specified period based on the level of concern and is reviewed each month by the SBTMT.
12. **+Threat** means a communication or behavior indicating that an individual poses a danger to the safety of school staff or students through acts of violence or other behavior that would cause harm to self or others. A threat includes communication or behavior characteristic of a person who is on the pathway to violence. The threat may be expressed or communicated behaviorally, orally, visually, in writing, electronically, or through any other means. Communication or behavior is considered a threat regardless of whether it is observed by or communicated to the target of the threat, or to a third party, and regardless of whether the target of the threat is aware of the threat. This definition also includes threats made to school property including, but not limited to, school buildings and school vehicle transportation.

A threat is not a communication or behavior that is an obvious joke or unequivocally known by the observer to be harmless or benign. The school personnel’s personal knowledge of the person making the statement or exhibiting the behavior, as well as the person’s age and history of

THREAT MANAGEMENT POLICY AND PROCEDURES

exhibiting such behaviors or making such statements, are factors that should be considered in determining whether the communication or behavior constitutes an actual threat.

13. **+Threat management** means the multipart process by which schools identify individuals exhibiting threatening or other concerning behavior, assess the risk of harm, and coordinate appropriate interventions and services for such individuals, as provided in Section 1006.07(7), Florida Statutes. It is a method designed to identify, using threat assessment protocols, whether behaviors or communications constitute a concern for violence or harm to another person. Upon a determination that a risk of violence exists, the threat management process then results in determining the level of concern and appropriate management of the person posing the concern to mitigate the risk of harm and remove them from the pathway to violence.
14. **+Unfounded Determination:** An unfounded determination means that there is not a sufficient factual basis to support the allegation, or it can be determined that the threats were never made; what was said was clearly not a threat; or the incident/behavior of concern did not happen or rise to the level of posing a threat or concern of harm to the school community. The reporting person may simply have been mistaken about the behavior or based upon known facts about the situation, behavior, and context, no risk of violence exists. The Unfounded summary disposition should only be used when it is clearly understood that there is no basis for concern. The case should be advanced to the next step for further evaluation if there is any doubt.

Threat Management Teams

Roles and Responsibilities

The school district is responsible for ensuring the integrity of the threat management process during the school year, including summer school, when applicable. The superintendent will designate the District Threat Management Coordinator. The school principal will identify the members of the School Based Threat Management Team. The member roles and responsibilities are described below.

- **District Threat Management Coordinator (DTMC):** A person in each school district designated by the superintendent to oversee the district's harm prevention and threat management program.
 - Serves as the liaison between the school district and the Department of Education's Office of Safe Schools and statewide threat management coordinator.
 - Ensures the fidelity of the district's threat management program (pursuant to Rule 6A-1.0019)
 - Ensures that all school threat management team personnel are appropriately trained on the Florida Model.
 - Refers the team to the procedures outlined in the district's mental health plan and/or school procedures for students exhibiting threatening or concerning behaviors of self-harm.
 - Serves on the District Threat Management Team.

THREAT MANAGEMENT POLICY AND PROCEDURES

- **District Threat Management Team (DTMT)** is a multidisciplinary team that will receive referrals from the School-Based Threat Management Team (SBTMT) and assess serious situations. The DTMT includes the District Threat Management Coordinator, persons from school district administration and persons with expertise in counseling, instruction, and law enforcement.
- **School-Based Threat Management Team (SBTMT)** will be lead by a Chair and Vice-Chair, who are appointed by the school principal.
 - The Chair serves as the point person for threat management at the school-level and is responsible for triaging reported threats or concerning behavior and communications to determine whether the matter should be summarily closed, or whether it should be reviewed by the full SBTMT. The Vice-Chair performs the Chair's duties in the Chair's absence.
 - The team shall be comprised of a minimum of four (4) members, each with expertise in counseling, instruction, administration, or law enforcement.
 - The SBTMT must also include a member with personal knowledge of the student of concern that is being evaluated by the team.
 - Additional members of the team may be assigned by the school principal, or designee, as long as the main four required roles are filled. Consulting personnel do not have to complete Florida Model training, and may not participate in the decision-making process.

Training

All SBTMT and DTMT members shall complete basic Florida Model training provided by or approved by the Office of Safe Schools and shall participate in training as needed if new guidance is issued by the Department. Newly appointed SBTMT and DTMT members shall be trained within the timeframes set forth by the Department.

Procedures

1. Threat management teams shall follow the Florida Harm Prevention and Threat Management Manual which is aligned with Florida Statutes, State Board of Education Rules, and the Department's model policy.
2. The school-based threat management process involves:
 - a. Identifying a threatening or concerning behavior and reporting to the SBTMT Chair.
 - b. Determining if the reported claim has a factual basis.
 - c. Evaluating the reported claim for threat of harm to self, others, or both.
 - d. Determining if the case should be referred to the full SBTMT.
 - e. Initiating an assessment to assign a preliminary level of concern and determine if interim SSMP is necessary.
 - f. Gathering information through interviews and data collection.
 - g. Assigning a concern level.

THREAT MANAGEMENT POLICY AND PROCEDURES

- h. Evaluating for Medium or High level of concern (if not Unfounded or Low level of concern).
 - i. Referring to the DTMT for some Medium level of concern cases that may need additional consultation and all High levels of concern.
 - j. Creating SSMPs, when appropriate.
 - k. Continuing to monitor the student during the SSMP period with ongoing evaluation of the SSMP to ensure it is effective.
3. The SBTMT shall meet as often as needed to fulfill its duties of assessing and intervening with students whose behavior may pose a threat of harm to themselves or others, but no less than monthly. However, if there is an imminent threat to school safety, then the principal or designee shall convene an emergency threat management meeting to address the imminent threat.
 - a. The threat management team shall document each meeting and include the meeting dates and times, team members in attendance, cases discussed, and actions taken.
 - b. The threat management team shall coordinate with other multidisciplinary teams to ensure all available resources are provided to students in need of support.
4. Threat management teams shall assess the behavior of students who may pose a threat of harm to themselves or others and to coordinate intervention and services for such students. All reported threats, concerning behaviors, and/or concerning communications, even those determined to be unfounded, shall be documented by the SBTMT along with any resultant action, using the Florida Model Instrument.
5. Threat management teams shall provide guidance to students, faculty, and staff regarding recognition of concerning behavior and/or concerning communication that may represent a threat to the community, school, or self.
6. Upon a preliminary determination that a student poses a threat of violence or physical harm to themselves or others, the threat management team shall immediately report its determination to the superintendent or designee. Nothing in this subsection precludes school district personnel from acting immediately to address an imminent threat.

Parental Notification

1. Where a report of concern includes an identified student target, the Chair must make a reasonable effort to notify the parent of the targeted student before the end of the school day that the report was received unless the Chair has determined the concern is Unfounded.
2. If the Chair of the SBTMT determines that the reported behavior is a Low level of concern and summarily closes the report, the Chair or his/her designee must use reasonable efforts to notify the parent or guardian of the student of concern on the same day as the report is closed.
3. If the Chair does not summarily close the case and refers it to the SBTMT, reasonable efforts must be made to notify the student of concern's parent on the same day the SBTMT assigns the preliminary level of concern.
4. If the level of concern is High (preliminary or final disposition), the Chair or his designee must notify the superintendent or designee to ensure that the notice requirements of Section 1006.07(7)(e), F.S., are met.

THREAT MANAGEMENT POLICY AND PROCEDURES

5. Parents or guardians must also be notified if the threat management process reveals information about their student’s mental, emotional, or physical health or well-being, or results in a change in related services or monitoring including, but not limited to, implementation of an SSMP.
6. All notifications must be in compliance with the Family Educational Rights and Privacy Act (FERPA).

Review of Threats

- The DTMC shall review all SBTMT threat classifications as identified in the Florida Model.
- The DTMC and/or DTMT shall have the authority to reclassify a SBTMT threat classification and shall notify the principal or designee of the decision and reasons for the reclassification.
- If a student with a disability is reported to have made a threat to harm others and the student’s intent is not clear, a referral will be made to the threat management team for evaluation.

Discipline and Consequences

- Threat management is not part of the disciplinary process. The school shall follow the Code of Student Conduct and Discipline Matrix to determine student discipline. Nothing contained in this section prohibits information learned during the threat management process from being used in a disciplinary proceeding, where appropriate.
- Any FAU Lab School employee found to have made a threat of harm toward others shall be referred to law enforcement and Professional Standards, and may be disciplined in accordance with policies, procedures, and agreements.
- Any visitor, contracted vendor, or volunteer found to have made a threat of harm to others shall be referred to the FAU Police Department. In addition, after consideration of the nature and circumstances of the act, the visitor, contracted vendor, or volunteer may be trespassed from school property with approval of the superintendent, the principal or designee.

Reports of Self-Harm

The FAU Lab School is committed to fostering a learning environment that promotes a culture of safety, respect, trust, and support. The school also recognizes the importance of parent/legal guardian involvement when a child makes a threat of self-harm or exhibits self-injurious behavior. To achieve this goal, employees shall follow the Suicide Risk Assessment Procedures Guide when a student makes a threat of self-harm or exhibits self-injurious behavior. All threats of self-harm made by students shall be immediately reported to school administration and the mental health designee, unless there is a reasonable belief that harm is imminent, then the threat shall be immediately reported to law enforcement and/or emergency services.

Statutory Authority: State Board Rule 6A-1.0019, F.A.C.; s. 1001.212, F.S.

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