MARYLAND CENTER for SCHOOL SAFETY

Behavioral Threat Assessment

Implementation Guide Expansion

Internal and Other Adult Threats

MCSS

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Foreword

Maryland's efforts to identify individuals who are on the pathway to violence, intervene early to prevent harm, and keep students and school personnel safe have been a continuous process since the enactment of the Safe to Learn Act (2018)[1]. The Act required the development of Maryland's Model Policy for Behavior Threat Assessment[2] as well as local public school system policies and local Behavior Threat Assessment (BTA) Teams. These efforts aligned with federal research and guidance published by the U.S. Secret Service National Threat Assessment Center (NTAC), *"Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence,"* July 2018[3], and *"Protecting America's Schools: A U.S. Secret Service Analysis of Targeted School Violence,"* November 2019[4].

In addition to disseminating the model policy, the Maryland Center for School Safety (MCSS) introduced an anonymous reporting system, Safe Schools Maryland (SSMD)[5], which provides a method by which anyone can report a school safety concern to all K-12 public, private, and nonpublic schools in Maryland. MCSS recognizes the importance of increasing bystander awareness of behaviors that may be indicators of an individual's risk for targeted violence and, as such, has partnered with federal, state, and local agencies to provide information to the public about recognizing and reporting these behaviors.

Following the closure of schools in 2020 and 2021 due to the COVID-19 pandemic, school personnel faced a surge in student behavior issues, including increased frequency and severity of violence. During that time, school systems recognized that a single system-level BTA Team was insufficient to meet the needs of the entire system, leading to the normalization of school-based BTA teams and an increase in the number of school personnel requiring knowledge of BTA principles. MCSS engaged local and state experts to develop the Behavior Threat Assessment Implementation Guide (2023)[6] as a resource to school personnel serving as members of a multi-disciplinary BTA team. This guide translates threat assessment practices from the law enforcement perspective into the K-12 school context, allowing for a public health approach to research-supported practices to be implemented as schools identify and intervene with individuals on the pathway to violence. The 2023 guide provides BTA principles and practices primarily regarding student threats.

While the primary intention of this expansion to the 2023 guide is to provide information about responding to adults who pose a threat to a school, it will also provide clarity on questions that have emerged since the initial publication, particularly defining a consistent set of terms for Maryland schools and new recommendations for threat management planning.

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[1] Md Code Ann., Educ. § 7-1507.
[2] Maryland's Model Policy for Behavior Threat Assessment (Sept. 2018), https://schoolsafety.maryland.gov/Documents/Reports-Docs/Maryland%20Model%20Policy%20for%20Behavior%20Threat%20Assessment-2018-19.pdf.
[3] https://www.secretservice.gov/newsroom/reports/threat-assessments/schoolcampus-attacks/details
[4] https://www.secretservice.gov/node/2565
[5] Safe Schools Maryland, https://schoolsafety.maryland.gov/Pages/Tipline.aspx
[6] Behavioral Threat Assessment Implementation Guide (Feb. 2023), https://schoolsafety.maryland.gov/Documents/Reports-Docs/MCSS%20Behavioral%20Threat%20Assessment%20Implementation%20Guide%20-%202023.pdf.

Similar to the development of previous resource documents, MCSS engaged a workgroup of experts to develop the following content from their expertise and experiences within the context of existing research and trends in terrorism and targeted violence. The School Safety Subcabinet and MCSS would like to thank our local, State, and Federal partners for their support and contributions to the 2024 Behavioral Threat Assessment Implementation Guide Expansion document. Your dedication and commitment to the safety of every student and every school in Maryland are commendable. The workgroup members represented the following positions and agencies. MCSS strove to engage diverse perspectives and voices while maintaining an action-focused workgroup. The absence of a particular agency or perspective does not imply that MCSS does not value that voice and perspective.

- Behavioral Health Coordinator
- Director of Student Services
- Coordinator Psychological Services
- School Safety Coordinator
- School Principal
- School Counselor
- Coordinator of Internal Investigation, Human Resources
- Parent
- Coach
- Teacher
- Local Law Enforcement
- Maryland Center for School Safety
- Maryland State Department of Education
- Maryland Department of Disabilities
- Maryland Assistant Attorney General
- Maryland Coordinated Analysis Center
- Federal Bureau of Investigation
- United States Secret Service, National Threat Assessment Center

BTA Terms and Definitions for Maryland Schools, 2024

Behavioral Threat Assessment - A term used to define the entirety of a fact-based, systematic process used to proactively intervene when an individual displays behavior that elicits a safety concern.

Recognize - This refers to when someone becomes aware of information about an individual that leads them to believe the person may be intending to commit an act of violence and shares the information with a person of authority or through a public reporting system.

Inquiry - Refers to gathering all available information from many different sources, such as interviews, social media searches, records review, prior law enforcement involvement, behavioral and mental health history, etc., to provide the BTA team with a comprehensive picture of an individual's actions and behaviors.

Safety Interview - A set of defined questions directed to an individual in private for the purpose of identifying existing factors that help to determine if a person may or may not be on the pathway to violence.

Screening - Use of an informal tool designed to assist a person of authority in determining how best to respond to information received about an individual who may pose a risk of harm.

Targeted Violence - A premeditated act of violence directed at a specific individual, group, or location, regardless of motivation and generally unrelated to other criminal activity. For schools, any planned incident of violence directed at a specific student or staff member, group of students or staff, or a school-related location, regardless of motivation.

Threat Evaluation - Threat evaluation occurs when a multidisciplinary team consisting of individuals germane to the given situation meets to share and analyze available information about an individual who displayed concerning behavior to determine whether the individual is on the pathway to violence and the level of threat the individual poses. The word EVALUATION, by definition, is _the act or result of evaluating and making a determination of something_. Thus, at this step, the BTA team evaluates all of the available evidence to make a determination.

Threat Management Plan - A series of defined actions implemented by designated individuals to; avert the immediate occurrence of violence (_response_), protect targets of violence (_safety plan_), and intervene with an individual who was determined by a BTA team to be on the pathway to violence (_intervention plan_).

Triage - The act of gathering available information to understand a situation and make a decision about how best to proceed in response to reports of an individual displaying concerning behavior.

Adults that Pose a Threat

The U.S. Secret Service National Threat Assessment Center (NTAC) continuously gathers information following mass attacks (defined as three or more casualties) in all public spaces, and 25 years of data has provided observable themes. School officials' awareness of identified themes allows for a strategic approach to the prevention of targeted violence. The most recent report was published in January 2023, using data from 173 attacks that occurred in the five years of 2016-2020[7]. The report provides an in-depth analysis of many variables and should be referenced by school officials. For the purpose of this document, several relevant themes will be highlighted that have implications for schools as they consider the importance of developing BTA processes for adults.
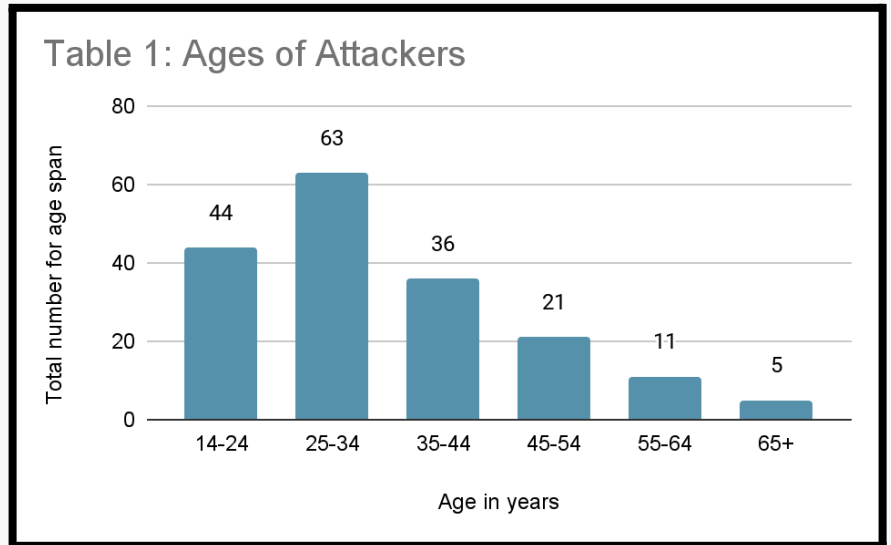
One hundred eighty (180) attackers perpetrated the 173 attacks. The majority of attackers were adults, with an average age of 34 (Table 1). 96% of attackers identified as male or were assigned male at birth. 64% of attackers exhibited behaviors and communications of concern that warranted immediate attention; in cases where concerning behaviors had been reported prior to the attack, 70% of the time, it was a family member making the report. Furthermore, 37% of the time concerning communications were shared by the attacker with others on the day of the attack. These data and themes reinforce the importance of informing the public of the importance of reporting concerns to authorities and that authorities need to be trained on what to do when someone recognizes a concern that warrants further inquiry.

Nearly 50% of attackers had a history of domestic violence that either resulted in criminal actions or went unreported but was identified following the attack. Nearly all attackers (93%) experienced one or more significant personal stressors in their lives within five years of the attack, and for most attackers (77%), the stressors occurred within a year before the attack. 49% of attackers experienced a stressor within 30 days before attacking. A full list of the types of stressors experienced by attackers is provided on page 33 of the report. The unique nature of schools serving as the central location for individuals connected to a school-age child to access various resources is critical as school safety stakeholders consider actions taken within the Behavior Threat Assessment (BTA) process.

Document structure

Consideration of adults that pose a threat to a school requires systems to be prepared to differentiate how the threat assessment and management model is implemented depending upon how the adult is connected to the school. The following three types of adult categories will be used in this document to provide recommendations for the differentiation of the BTA process: (1) a current or former school employee, (2) a caregiver of a student currently enrolled at the school, and (3) an unaffiliated adult with

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[7] https://www.secretservice.gov/sites/default/files/reports/2023-01/usss-ntac-maps-2016-2020.pdf

no known connection to the school. Each category is defined in more detail during the introduction to that section.

These categories can also be referenced as internal threats (employee) and external threats (caregiver and unaffiliated adult). Research and practices related to internal threats can be found within workplace violence policies and emergency planning guidance. External threats are most commonly referenced in federal law enforcement resources for attacks on public spaces. This document is structured so the reader can review specific suggestions for each step of the BTA process (recognize, inquire, evaluate, intervene) applied with the unique considerations for each type of adult.

There are considerations that apply to each adult category as well as areas in which an adult dynamic is very different from a student. **Green inset boxes** within the document will be used to call out a practice that is consistent across multiple categories of adults and students and draw attention to recommendations for a practice that has not previously been mentioned in the BTA Implementation Guide. **Yellow inset boxes** within the document will be used to call out an area of divergence for school personnel when the adult consideration differs substantially from the student.

References new to Maryland

The development of procedures and processes for responding to adults provides the opportunity to introduce some new approaches to Maryland and further clarify the use of common phrases in this document. These items are presented now to provide the reader with an advanced understanding of how to support their application within a context elsewhere in the document.

Concerning behavior

The phrase "concerning behavior" will be used throughout the document and can also help to provide clarity to the public about how to recognize behaviors that warrant a report. It is intended to mean an observable behavior that elicits concern in others regarding the safety of an individual or those around them. Concerning behavior is a spectrum that can include lower-level concerns, such as unusual interests in violent topics, conflicts or grievances between peers, 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 threatening behaviors, weapons violations, and other aggressive or violent behaviors. In recognizing lower-level concerning behaviors, it is important to determine whether a behavior is concerning in that it deviates from the person's baseline behavior. Some concerning behavior for one person may be "typical" behavior for another person. **Concerning behaviors are different from prohibited behaviors**, which are always concerning, even without context or without comparison to the individuals' baseline.

Concerning communication

The phrase "concerning communications" will also appear within the document and should be used to help inform the public of what types of things to report. Concerning communications are unusual, bizarre, threatening, or violent communications made by individuals or groups. 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 suicidal ideation.

Central Behavior Threat Assessment Team

This will be referenced in the document as the **Central BTA Team,** which is a team of school system executive leaders charged with receiving referrals from schools and conducting behavior threat evaluations for adults when necessary. A member of the Central BTA Team should be designated to serve as the **consistent lead** for this team. Executive leadership staff to consider as members of the team include:
- Director of Student Services
- Behavioral Health Services Coordinator
- School Safety Coordinator
- School Safety and Security Director
- Human Resource Director
- Legal Counsel
- Supervisor School Psychologist
- Supervisor School-Based Support Staff
- Superintendent or Asst. Superintendent
- Director of School Leadership
- An individual from the Local Department of Health
- Local Law Enforcement Supervisor

Community-Based Multi-Disciplinary (CBMD) Team

The CBMD Team is composed of individuals from various local human service agencies who meet regularly to respond to referrals of individuals who demonstrate behaviors that warrant intervention to prevent violence. The section for unaffiliated adults references the CBMD team, and further information and resources about the team will be provided in this section. While the CBMD team may be used for an employee or caregiver, it is a critical resource when responding to an individual of concern who is outside the reach of a school.

Human first approach

While this term does not emerge with words in the document, the intention of the content that follows is to interrupt and prevent violence while recognizing that an individual who is having their life dissected and being judged by their worst days is, first, a human. Engaging with the individual in a **human first** way will more likely lead them away from violence and decrease real or perceived grievances. Remember that every individual, student or adult, will continue to live in the community (yours or another), and what you do will have a lasting impact on their future behavior.

Unique Differences Between Students and Adults

Adult Legal, Privacy, Civil Rights, and Civil Liberties

It is important to note that adult rights vary in several ways from those of students. Adult protections are provided through laws, such as rights related to possession of a weapon, civil liberties, such as the right to free speech, and civil rights, that provide equal protections regardless of identifying characteristics.

Law enforcement officials are generally entitled to view criminal history information. Limits to disclosure of health information (HIPAA) to include mental health information exist but are not absolute prohibitions and, under conditions established by federal and state laws as well as court rulings, can be made available to a BTA team engaged in an evaluation to prevent an act of targeted violence. Having legal counsel as a regular member of the Central BTA Team or available to consult when needed is valuable to avoid both over and underreach.

Personally identifiable information may be relevant to the evaluation and can be considered part of the body of information. BTA team members who are privy to the information must remain mindful of its confidential nature and their duty to keep information shared during the threat assessment process private.

A practice worth consideration is to have members of the Central BTA Team and CBMD team sign a confidentiality agreement that requires them to keep information they learn during the evaluation private. It is also helpful when engaging community based agencies to use a Memorandum of Understanding (MOU) that defines expectations, training requirements, and other processes.

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Access to Weapons

Access to weapons can come in various forms. Many objects can be used as weapons, including firearms, explosives, bladed objects, and vehicles, to name a few. Understanding the context and nature of the threat is important to understand the type of weapon an individual may consider using in an attack. Weapons may be accessible directly (in the home) or indirectly (through a neighbor, friend, or family member).

Knowledge of a student in possession of a firearm often triggers concerns that lead to a report and further inquiry by school officials. This, however, should not be the case for an adult unless factors prohibiting the legal possession of the firearm are known to exist in accordance with state laws. A combination of other concerning behaviors and risk factors should exist in order for firearm possession to become part of the BTA process.

Managing the Situation, NOT the Person

The ability to develop and implement an intervention plan for juveniles, which caregivers and school officials have a responsibility to teach and influence in preparation for adulthood, is very different from that of an individual who is a legal adult. The management element of behavior threat assessment for an adult is about managing **the situation** in a way that provides resources to targeted individuals and interrupts and prevents violence from occurring. School officials should be mindful that after a situation has been resolved, official law enforcement involvement with an adult will likely end, and school officials will need to develop a means by which to remain aware of an adult who was determined to pose a threat to the school in the future.

Evidence-Based Research to Inform Actions

School officials should remain aware of emerging data trends provided by the U.S. Secret Service. NTAC research has found that the reasons behind target selection are complex and multifaceted. Students or former students have targeted schools they currently attend or have attended because of reasons such as familiarity with navigating the environment, personal grievances or conflicts with peers, teachers, or the school administration, and desire for notoriety and fame by attacking the school as a high-visibility target. In comparison, NTAC research has found that past adult attackers have had different motivations than juveniles due to ideological beliefs, workplace grievances, or broader societal issues that are not necessarily felt by students. These adult motivations may lead to the selection of targets more indiscriminately.

Physical Access to School Grounds and School Events

Attending a school event and being physically present on a school campus is NOT a right given to every individual. Denying access to unaffiliated adults is a reasonable approach when safety concerns exist.

Considerations for Applying Behavior Threat Assessment and Management Principles
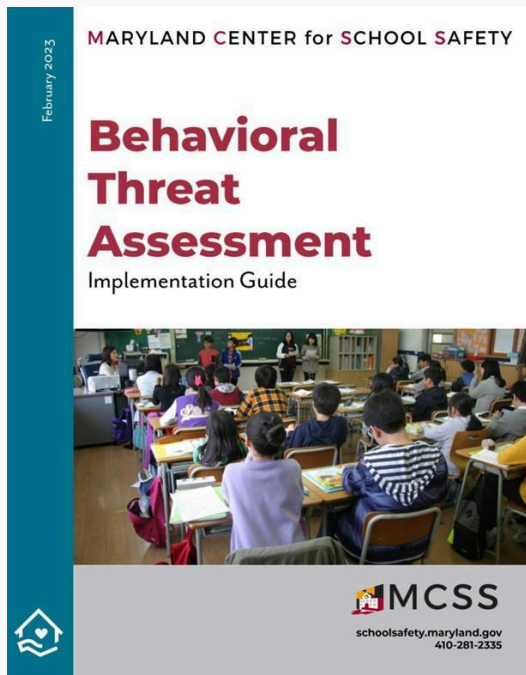
The reader is reminded that the following information applies principles previously conveyed in the MCSS Behavior Threat Assessment Implementation Guide.

Principles related to the multi-disciplinary team BTA process are applied to the various considerations of an adult demonstrating concerning behaviors or communications.

Employees Who May Pose a Threat

School personnel who report to work every day, year after year, are the constants in an ever-changing educational landscape. In many schools, staff members have educated and provided care to multiple generations of a family. They serve as community leaders, coaches, and public servants beyond their official duties as educators. They are themselves a part of the local community with a web of personal and professional connections. Situations can arise when an employee, a former employee, or an employee's domestic partner engages in concerning behaviors and communications that warrant inquiry. Situations such as these would be considered "insider threats" and may also be addressed within policies related to "workplace violence" and "employee conduct."

Maryland Model Behavior Threat Assessment Policy, 2018 "Two examples of non-student threats that were previously not regularly addressed in local school system policies involved threatening behavior exhibited by 1) school system employees, and 2) persons who are (or have been) involved in abusive relationships with school system employees (or students) and exhibit violence that spills over into the school/workplace. Under the Maryland Safe to Learn Act, and when the school could reasonably know of the concerns, these examples would be included under the purview of school threat assessment teams."

The 2018 Maryland Model Behavior Threat Assessment Policy[8] includes requirements for workplace-related threat assessment and should be referenced by local officials when reviewing local policy. The information in this section is not intended to replace local policy but to increase awareness of existing requirements, inform practices that support early identification of concerns, and suggest ways to apply behavior threat assessment principles to employee-related situations.

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[8] Maryland's Model Policy for Behavior Threat Assessment 2018,https://schoolsafety.maryland.gov/Documents/Reports-Docs/Maryland%20Model%20Policy%20for%20Behavior%20Threat%20Assessment-2018-19.pdf, Pages 33-38.

RECOGNIZING an employee

Obtaining and responding to information about an employee who may pose a threat is uniquely complicated for a number of reasons, each of which should be considered and accounted for by locals to increase the likelihood that concerns are reported. Bystanders reporting information about a peer exhibiting behaviors of concern require them to recognize behaviors that warrant further inquiry and feel compelled to take action. An employee's self-reporting and sharing of information about their own personal life is humbling and requires courage and trust in the person receiving the information. One way to minimize the stigma of both types of reporting is to communicate with school officials openly on the topic and have defined expectations and procedures. Principals engaging with their staff throughout the year, reinforcing the value of personal well-being and a culture of support for each other both professionally and personally, builds a culture of support among staff and school leaders.

School leaders should encourage staff to come to them directly with any safety concerns and provide a mechanism for anonymous reporting. Individuals should be encouraged to trust their instincts when something doesn't sit right with them or seems "out of the ordinary." It is better to have said something that is found to be meaningless than not to say something and realize in retrospect that it was relevant. The what and how of recognizing and reporting should be made clear to all school staff.

Bystander Reporting Details:
- Define the types of behaviors and conditions that warrant concern and should be reported.
- Identify a method by which an employee can speak to a neutral person for guidance on how best to proceed with information about a peer.
- Identify how information about a peer should be reported.

Self Reporting Details:
- Define the conditions when an employee should share personal information that they have been or could be the target of violence.
- Determine methods for employees reporting information about their own situation that ensures privacy, nonjudgement, and no impact on their performance evaluation. Methods for reporting to school based admin or Human Resource (staff relations person) should be defined.

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INQUIRY of an employee

Reports of concerns about an employee come in many shapes and sizes, requiring varied responses that are both systematic and empathetic. Any information received should be handled professionally with the utmost privacy. Gathering all available information as part of an initial inquiry of an employee should occur either by or in consultation with someone from Human Resources (HR). Engaging in an inquiry is merely to decide how best to proceed. Information gathering methods similar to those during a student's inquiry should align with local policies and may include; interviews with the employee, social media searches, employee records review, which would include prior law enforcement involvement and known behavioral and mental health history, which can inform the appropriate next step. This section will be presented in segments with headings due to multiple considerations at this stage of the process. *NOTE:* The order of these segments is not intended to imply a hierarchy of action.

Administrative leave

Using administrative leave as an interim measure to remove an employee from the school campus during an inquiry depends on the severity of the potential threat, the procedures that will be required (hearing, criminal investigation), and the length of time it will take to gather information. If the results of the inquiry warrant the Central BTA Team to conduct a threat evaluation, administrative leave is appropriate as the employee should not be allowed to continue accessing the school campus and performing their regular duties until such time they are deemed not to be a threat. School security and Information Technology officials should be notified in these instances so that keys, badge control functions, and digital access functions can be disabled as appropriate.

> Plan from the start with the belief that the final outcome will be the employee returns to work in the future. Find ways for the person to exit the building **with grace and maintain their dignity.** This end in mind thinking minimizes the work that has to happen upon their return.
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> (green box)

It is prudent to make services available through employee assistance programs to individuals who are out on administrative leave. Additional strategies to consider include assigning a human resource staff person to act as a case manager. This person will serve as the primary contact and communicate with the employee on a regular basis to inform both sides of status updates. The use of a CARE team (see page 18) to direct the employee to services as soon as possible is advantageous in supporting them through various processes and can lessen the escalation of emotions and grievances by preparing to support them through all possible final outcomes.
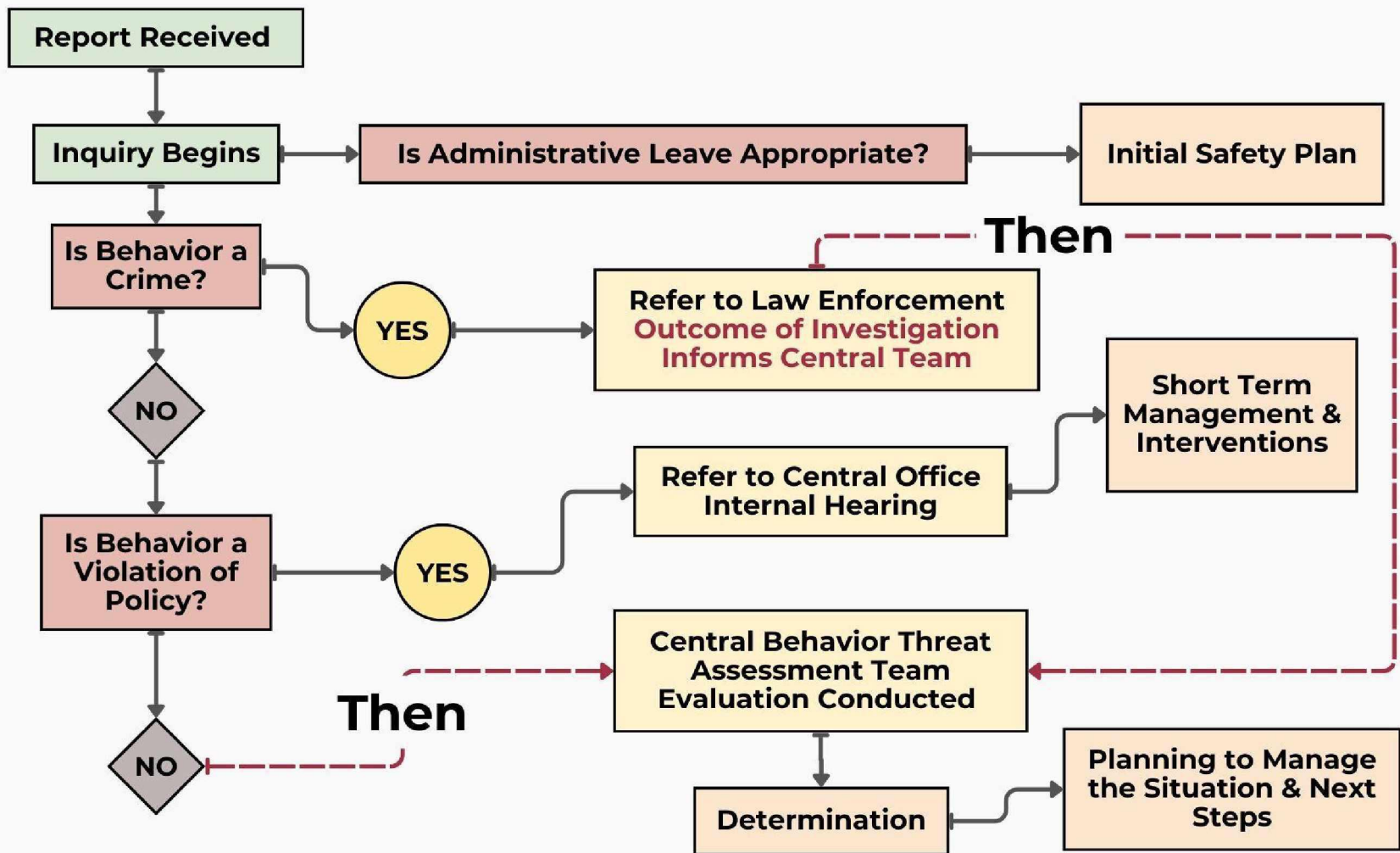
Application of multiple procedures

When conducting an inquiry for an employee and information gathered indicates that the reported allegation is credible and can be substantiated, then officials must consider:

1) Is the behavior a crime? If yes, a referral to law enforcement occurs and takes precedence over the school system inquiry. School officials need to understand that when a matter is criminal (misdemeanor or felony) and becomes within the scope of a law enforcement investigation, school officials should not interfere and that the absence of information does not imply inactivity. The results of a criminal investigation can inform the Central BTA Team. However, the Central BTA team does not need to wait for these results to determine a level of threat and corresponding intervention based on the information currently available to them.

2) Is the behavior a violation of policy? If yes, the case is referred to the appropriate central office official for a hearing. Personnel from the central office should communicate with the individual in a way that de-escalates the individual and minimizes future escalation. The outcome of the hearing, including conditions of return, will likely remain private between the employee and hearing officers. School officials will likely be provided information only related to work conditions and their employment status to allow for the regular operation of the school.

Again, it is common that an individual under investigation experiences an escalation of emotions (grievance, ideation) during this time, and threats of harm to themselves or others should be closely monitored to inform the determination of the Central BTA Team.

Report Received

Inquiry Begins

Is Administrative Leave Appropriate?

Initial Safety Plan

Is Behavior a Crime?

YES

Refer to Law Enforcement
Outcome of Investigation Informs Central Team

Then

Short Term Management & Interventions

NO

Is Behavior a Violation of Policy?

YES

Refer to Central Office Internal Hearing

Central Behavior Threat Assessment Team Evaluation Conducted

Then

NO

Determination

Planning to Manage the Situation & Next Steps

Considerations for the employee who is a victim of violence

The prevalence of domestic violence in America almost certainly means that there are employees across Maryland schools who have been impacted in the past or are currently living with conditions that make them either the victim or perpetrator of violence. Methods used to separate individuals enmeshed in these dynamics can lead to escalated attempts to come into contact at known routine locations such as the workplace, thus bringing a threatening situation to the school campus.

> "Domestic violence is a pattern of abusive behavior in any relationship that is used by one partner to gain or maintain power and control over another intimate partner. Domestic violence can be physical, sexual, emotional, economic, psychological, or technological actions or threats of actions or other patterns of coercive behavior that influence another person within an intimate partner relationship. This includes any behaviors that intimidate, manipulate, humiliate, isolate, frighten, terrorize, coerce, threaten, blame, hurt, injure, or wound someone."
>
> **U.S. Department of Justice**
> **Office on Violence Against Women**

Both Individuals are employees of the system

When both parties are system employees, it is important that the inquiry and investigation be conducted in a **way that is fair to both parties**. Federal Title IX laws[9] may apply in this situation if the situation involves sexual misconduct, to include but not limited to; dating violence, domestic violence, rape, and fondling. The system's Title IX Coordinator should be consulted when the system employs both individuals. There should be internal Human Resource measures for each employee to have the initial opportunity to indicate how they want the inquiry to proceed and the desired outcomes. Regardless of an employee's decision to resign, transfer, or proceed with criminal charges, if the behavior of one employee creates safety concerns for the school, the Central BTA Team should still consider whether it is appropriate to proceed with the BTA process. It should be recognized that this inquiry event will be an additional stressor, and there may be an escalation of an individual's grievance, as well as the idea that violence is an acceptable means to reconcile the issue. All possible resources should immediately be engaged to assist both parties and reduce imminent harm.

One individual is an employee of the system

The employee is the victim

When information is reported that an employee is currently the target of violence by a person NOT associated with the school system, personnel engaging with the employee who is a victim of domestic violence should do so in a trauma-responsive manner, seeking information to determine the appropriate next steps. School officials should work WITH the employee to create a safety plan with considerations for arriving and leaving work, denying the offender access to the school campus, and other special circumstances that exist, such as public after-school events. It is important that the employee who has been victimized is at the center of developing the safety plan and that the ability to control the plan is not taken away from them.

The employee is the violent partner

When information is reported that an employee is the aggressor perpetrating domestic violence, school officials should ensure referrals have been made to the appropriate agency; Maryland

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[9] https://www2.ed.gov/about/offices/list/ocr/docs/titleix-summary.pdf

Department of Social Services (1-800-91-Prevent) and local law enforcement. Information should be gathered from relevant parties to allow school officials, in consultation with Human Resources and system-level leaders, to determine the appropriate next steps related to the employee and work.

EVALUATION of an employee

The Central BTA Team should convene when readily available information gathered during the inquiry leads school officials to believe that the employee may pose a threat to the school or an individual within the school. While including individuals who work directly with the person, such as the Principal or Assistant Principal on the team, can be helpful when examining information, it can also be biased and prove detrimental in the future when an employee returns to their regular duties. Decisions about the inclusion of school personnel should be made on a case-by-case basis.

> School Psychologist are qualified to provide services for students not adults. Engaging with adults in a clinical manner is not an expectation of the work conducted by a School Psychologist.

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Safety interviews that are conducted with the employee and used to inform the Central BTA Team should adhere to all federal, state, and local employment policies and procedures. The employee should be made aware that the Central BTA Team will use information from the interview to determine the level of threat they pose. The person conducting the interview should be very transparent about their responsibility to disclose certain information to authorities and adhere to all professional standards.

INTERVENING with an employee

Intervention planning for an employee can be advantageous even when a report of concerns doesn't proceed further than the inquiry stage. Trust and respect are fundamental aspects of individuals employed by a school system. The mutual trust and respect of staff in a school allows everyone to perform the many duties of educating students. Neglecting to recognize that harm likely occurred to this relational dynamic when a person was singled out and thought to pose a threat to the school would be an error and potentially cause further harm to individuals and the school climate. Intervention planning should happen WITH the employee who is returning and done in the most gracious manner to allow for professional growth and personal well-being.

While defining conditions and expectations as part of a plan seems more reasonable than with caregivers and unaffiliated adults, it is still important to acknowledge the limitations of creating an intervention plan for an adult. Conditions that REQUIRE the employee to comply with physical or mental health treatment as part of the return to work would not be reasonable. Decisions about the best course of action following the outcome of an inquiry and evaluation can be made in a way that allows all parties to move forward with dignity while maintaining the safety of a school.

The employee returns to school duties

When an employee is returning to a school following any type of procedure (inquiry, leave, hearing, criminal investigation), steps should be taken to help make the transition a success for everyone involved so that students learn and employees effectively perform their duties. It is NOT likely that any

information about the outcome of a procedure (Law Enforcement investigation, Internal hearing, or threat evaluation) is made fully available to school officials. Thus, officials should not plan to provide a third party with specific information or assurances using this information. However, it should be noted that siloing of information can be counterproductive to violence prevention. Local investigators should consider what pertinent information can be shared with the victim and school officials to help them take an active role in management planning. Transparency also fosters future reporting and increases public confidence in the BTA process.

Steps to consider taking when <mark>the person who was harmed</mark> or directly impacted is at the school:
- Provide advance notification of the employee's return in a setting where the person impacted can express any concerns in private.
- Identify with the person impacted ways that school leaders can support them during the transition.
- Consider with the person impacted whether it is appropriate for there to be a no-contact stipulation.
- Schedule time to check back with the person impacted to see how it is going.
- Provide information to the School Resource Officer (SRO) about the employee's return to work and any special conditions that exist.

Steps to consider taking for <mark>the employee returning</mark> from a threat-related procedure:
- Meet with them in advance of their return to;
  - listen and re-establish rapport,
  - review any special conditions that have been arranged,
  - review the retaliation policy to be clear about expectations, and
  - find out what specific needs they have to make the transition successful.
- Provide support to them as needed during the transition.
- Schedule time to check back with them to see how the transition is going.

The employee is dismissed

School systems likely have procedures in place for when a staff member has been dismissed during the school year, but it is important to recognize that in the context of circumstances in this document, special care should be taken given the potential for escalated emotions.
- Security measures should be taken as soon as an individual is placed on leave for an inquiry and immediately upon notification of a dismissal. All electronic entry badges and keys should be collected and deactivated, access to digital platforms should be removed, technology devices (phones, laptops) should be collected, and school identification badges should be collected. Systems should clearly define who is responsible for this step of the dismissal process to avoid faulty assumptions.
- Human Resource staff should arrange for an employee to retrieve personal items from their workspace outside of school hours. The HR staff person should supervise the former employee during the exit process. School security officials should, at a minimum, be notified of when the former employee will be on campus to remove their items, and in some instances, the security official should be present. Additional considerations to allow for the graceful and safe exit of a dismissed employee include;

- School custodial staff should make items such as packing boxes, carts, and dollies available in the former employee's space to expedite the process.
- Items that are property of the school system should be removed in advance from the former employee's former workspace to avoid confusion and conflict during an already emotional process.

CARE Teams

CARE Teams are a common practice in the private sector and hospitals. They are designed to have identified staff ready to deploy and assist an employee who has demonstrated a sudden need for services and supports to help them navigate a crisis situation. Members of the CARE Team are ready to quickly facilitate referrals and make connections to community resources. CARE Team members are solely about supporting the individual and helping them navigate successfully through the crisis.

(yellow box)

Caregivers Who May Pose a Threat

Caregivers (parents, grandparents, siblings, extended family) are a child's first teachers and remain critical members of the team of individuals providing the child the opportunity to acquire knowledge and skills through much of the K-12 experience. As such, school personnel using communication skills such as listening, speaking, and writing to maintain a healthy collaborative relationship with caregivers is ideal. It is not the intention of identifying this category of adults to convey in any way that all caregivers pose a threat.

It is, however, important to recognize that there are situations and circumstances of life that may lead an individual who is the primary provider of care for a child enrolled at a school to pose a risk of engaging in an act of violence. A grievance may become directed at the school when this person feels they have been wronged, such as during custody agreements that have protection orders or following the removal of a child from the home after an abuse investigation. The caregiver may be targeting violence toward individual staff at the school that they feel are to blame or, in general, at school personnel who are denying them entry and access to their child. In a recent local event, a mother threatened violence against another student at the school who had bullied or harmed their child. Imagining circumstances that would lead a parent, grandparent, or other family member to such extreme measures is not unreasonable.

RECOGNIZING a caregiver

Information about a caregiver who has made a threat directly or is implying that they may pose a threat through writing, posting on social media, or with their physical body language should be given immediately to a school leader. The school leader should take the information provided seriously and immediately seek to gather additional information that will provide context to what occurred, a history of prior interactions, and any racial, ethnic, or cultural biases that may be influencing how the staff person perceived the caregiver as threatening. This initial inquiry can provide information related to whether the concerning behavior is transient, such as a difficult meeting with their child's teacher, or substantive, an ongoing pattern of concerning behavior that rises to the level of threatening.

Don't confuse bad behavior with a threat.

A decision to proceed to a threat assessment inquiry and evaluation should be made by acknowledging that doing so may further escalate the caregiver's grievance and possibly further alienate the individual from the school community. This does not mean that it is not appropriate in those instances where the immediate information demonstrates concern that the individual poses a risk of perpetrating violence. School leaders should seek consultation with the Central BTA Team leader before making a final decision to refer the caregiver, as the system-level person can provide an objective perspective on the situation.

INQUIRY of a caregiver

Upon referral from a Principal of a caregiver who may pose a threat, the Central BTA Team leader should assume the lead of all BTA practices. This is recommended to (1) allow for an objective assessment of the caregiver and situation and (2) preserve (as much as reasonably possible) the relationship between the individual and school officials. The Central BTA Team lead, or their designee, should engage directly with the caregiver to introduce themselves as the person leading the inquiry, serving as their primary contact, and conduct an in-person interview as part of the information-gathering process. The caregiver should be provided clear instructions, both verbally and in writing, about any restrictions being placed on them related to contact with school personnel and access to the school grounds. If restrictions have been placed, it is important for the caregiver to be

provided a timeframe for the restrictions as well as what future expectations of them will be until a resolution to the situation occurs.

When delegating inquiry tasks to other staff, the Central BTA Team lead should remain mindful of protecting the caregiver's privacy and dignity. Personnel conducting interviews and gathering information should remain objective and professional. The ideal conclusion prevents violence and allows the caregiver to have a positive relationship with the school community in the future. Information obtained through the BTA process remains confidential and should be protected by members of the team.

EVALUATION of a caregiver

The degree of caregiver compliance with requests made by the Central BTA Team will often dictate how the BTA process proceeds. If the parent is complying with requests to share information and participate in formal and informal interviews, the Central BTA Team can proceed with determining the level of threat and developing an intervention plan accordingly. Compliance does NOT imply that the individual is NOT on the pathway to violence and should not negate the gathering of other information by the team for analysis.

When determining a threat level the team should first consider is there a real threat? Thus in addition to low, medium, or high threat levels another determination should be that the individual appears to pose **No Threat** at this time.

(green box)

A caregiver refusing to communicate with individuals from the Central BTA Team or participate in other requests made as part of the BTA process does not preclude the team from continuing to conduct an evaluation based on the available information. When the reported behavior or communication is proven to have occurred, and the information available is sufficient to make a determination given an analysis of all available information, the team is duty-bound to determine the level of threat and take steps within the intervention plan to protect students and staff. The use of a Community-Based Multi-Disciplinary (CBMD) Team (see page 24) can be beneficial in these instances in seeking additional information about the individual.

INTERVENING with a caregiver

There are several important considerations when developing an intervention plan for a caregiver, most importantly valuing the role of caregivers in a child's educational experience. Alienating a caregiver from school will very likely lead to the child perceiving that they, too, do not belong, the exception being those extreme cases when a caregiver is a threat to the child. **While adults have many rights related to their child's educational experience, the right to be physically present on school grounds is NOT one of them.** Expectations of behavior by caregivers when on school grounds that are conducive to the safety and security of the school community are reasonable. School officials can not MAKE a caregiver comply with anything; thus, an intervention plan should be designed with this understanding to avoid frustration and continued tension.

Typically, the purpose of the management phase of the process is to create a situation that addresses the underlying grievance and supports the individual, making them less prone to violence. However, it

has to be recognized that it is outside the domain of school officials to define these types of supports beyond attempting to address a school-related grievance. Use of the CBMD team may be appropriate in providing management support.

Response: The following should occur upon the individual of authority receiving notification that a caregiver may pose a threat to the school.

1. Determine whether an act of violence is imminent, requiring the immediate involvement of Law Enforcement.
2. Identify any necessary actions and steps given the individual's current situation and location.
3. Gather information about the situation and the individual to inform the next steps.
4. If a referral to the Central BTA Team has occurred, determine, in collaboration with the lead, what temporary conditions will exist for the caregiver while the evaluation is conducted.

Safety Planning: When the team has determined the caregiver poses no threat, efforts should be made as soon as possible to resolve the situation that prompted the concern and repair any harm between the parent and school staff. School officials may find the following items helpful in developing a safety plan for a parent who the Central BTA Team has determined poses a medium or high risk of committing an act of targeted violence. These actions are not intended to be considered requirements.

- Initiate with law enforcement a no-trespass order for the parent.
- Create conditions under which the caregiver can communicate information about the child to relevant school officials (e.g., calling out sick, information about assignments, registration).
- Identify ways the caregiver can receive communications from the child's teacher about school performance.
- Identify ways the caregiver can participate in school activities virtually, such as attending a parent-teacher meeting or watching a livestream of the band concert.

Intervention Planning: Requiring or recommending therapeutic interventions is not appropriate for this team, particularly making a caregiver unable to get privileges returned as a condition. An appropriate intervention approach would be offering the caregiver an opportunity to engage in restorative approaches that seek to repair the harm that has occurred with various parties. This would require a skilled and experienced facilitator and strategic pre-conference meetings with impacted individuals and should not be taken lightly.

Unaffiliated Adults Who May Pose a Threat

The public school often serves as the central hub of a community—the place where community members come together to celebrate youth, access resources, exercise, and learn. Maryland Annotated Code §5-223 defines a community school as "a public school that identifies a set of strategic partnerships between the school and other community resources that promote student achievement, positive learning outcomes, and the well-being of students by providing wraparound services." The 2019 and 2021 Blueprint for Maryland's Future legislation promotes community schools[10] as a best practice for increasing student achievement and well-being by providing Concentration of Poverty grants to local schools. Community schools bring adults from external partners to the campus to provide services and student family members to the campus to access these services. It can become common for school personnel and students to see unfamiliar adults inside and outside of the school building, which may lead to complacency with critical security measures. This is merely a fact and is not meant to imply that MCSS does not support community schools or that they are less safe; rather, it is information of note when considering this category and security.

The term unaffiliated adult refers to individuals who are not connected to the school as a current; student, caregiver of a student, employee, or partner of an employee. An adult who has been removed from one of the previous categories for **longer than a year** would be considered an unaffiliated adult because of the information gap that exists, reducing the ability to recognize and respond to concerns.

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[10] Blueprint for Maryland's Future Final Report, December 2020

RECOGNIZING an unaffiliated adult

Recognizing the signs of concern exhibited by an unaffiliated adult requires a whole-community, public health-informed approach. Providing information to the public, beyond the existing school-related stakeholder groups, about how to recognize concerns and how to report them will be important to engaging with unaffiliated individuals early. The Safe Schools Maryland (SSMD) anonymous reporting system is an existing way for the public to share information about a concern, and while it is typically used for student behavior, there is nothing that would prevent a bystander from reporting an adult exhibiting behaviors of concern or concerning communication. Local considerations should be defined for where the public should report information that is not criminal or terrorism but falls within the scope of behaviors of concern that an adult may pose a threat. This is important, and steps should be taken to clearly communicate information with the public about recognizing what to report and how to make a report.

INQUIRY of an unaffiliated adult

School officials will have limited ability to engage in the steps to gather information about an unaffiliated adult. Local law enforcement officials will take the lead in these situations and work to maintain close communication with school system-level leadership. School officials should determine who serves as the primary educational contact person for law enforcement during this BTA process. This individual would be the person receiving and conveying information to all necessary stakeholders. This individual may or may not also be the person involved in the Community-Based Multi-Disciplinary (CBMD) team. The healthier the relationship between local law enforcement and local school officials, the more likely quick and effective communication and response will be during these types of situations.

Reports can be received at any time of the day or day of the week. Local school systems that have plans in place to bring relevant personnel together outside of the typical school schedule will allow for a rapid response. Considerations for meeting spaces that allow for a large number of people to gather to provide and receive information are also advantageous. Engaging closely with law enforcement during low-stress times builds confidence and trust that can be capitalized upon during high-stress situations. Local, state, and federal law enforcement personnel can build trust by sharing information with school officials about current conflicts and threat concerns within local neighborhoods, as well as elevated threats directed toward specific racial and ethnic communities.

EVALUATION of an unaffiliated adult

Conducting a Behavior Threat Evaluation for an unaffiliated adult who has come to the attention of officials is best done using a Community-Based Multi-Disciplinary (CBMD) Team. School officials who are impacted and have relevant information, such as when an individual had a prior connection to the school as a student, employee, or caregiver, should be members of the team. MCSS recognizes that currently, in 2024, these teams exist at a very basic level in only a few Maryland communities. Boston Children's Hospital published a brief in June of 2024, "Multidisciplinary Threat Assessment and Management Teams in practice: Common elements and operations of community-based MTAMTs," providing an overview of the community-based team model based on interviews with 12 teams currently operating.

Below are links to several examples of a CBMD team model to help local communities better understand the role these teams play in preventing targeted violence.

- [ProtectDC Program](#)
- [Threat Team Hawaii](#)
- [Rochester Threat Advisory Committee](#)

A Community Based Multi-Disciplinary (CBMD) Team

The CBMD team utilizes a public health approach to violence prevention to evaluate an individual's risk of violence or serious harm, share information, and coordinate resources and services. The intent is to prevent violence and criminal behavior from occurring.

Members to consider (this is not an all inclusive list) attending regularly or as needed. The asterisk denotes individuals who would be on the core team part of each evaluation. Other individuals would be prepared to participate given the case need.

Local county representatives from:
- Department of Human Services*
- Department of Health*
- Department of Juvenile Services
- Behavior Health Administration*
- Office of Youth Services
- State's Attorney*
- School Representatives (public, private, nonpublic, charter)
- Law Enforcement (intelligence, youth & family)*
- Area Hospital
- Major Service Provider(s)
- Faith Based Organizations

Referrals are made to the CBMD team from any individual or agency using a publicly available method that is anonymous and always available.

Team leaders meet bi-weekly to review and determine the appropriate next step for referrals. The core team meets monthly at a regularly scheduled day and time.

The BTA process remains consistent with that occurring within Maryland schools for PreK-12 students providing the same methodology to adults who display behaviors of concern.

Recognize → Inquire → Evaluate → Intervene

(green box)

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INTERVENING with an unaffiliated adult

One difference between student and adult BTA processes is the limitations regarding what can reasonably be expected for intervention with an adult, which is even more difficult for an unaffiliated adult. School officials need to advocate for the safety of their students and staff while recognizing the difference in what law enforcement officials can legally do to **prevent a crime** from occurring. Specific details will be required from law enforcement for school officials to act upon and make decisions about appropriate response protocols[11] given a potential threat.

- Where the individual is currently located?
- What is the individual's current state of mind, and are there indicators that an attack is imminent?
- Does the individual have a history of criminal or threatening behavior that would indicate they would likely commit an act of violence?
- What level of threat was determined by the team, and what, if any, actions are being taken by law enforcement at this time and in the near future?

School officials can use the information provided by law enforcement to manage the school response to the situation by developing a safety plan that may include any of the following.

1. Access additional security resources for specified times and locations given the information available about the threat.
2. Share a photo of the individual with school personnel with details of what to look for and how to respond in given circumstances.
3. Consider whether the information being used by a public school should be shared with local private and nonpublic schools that should have the same heightened concern.
4. Define what new information should be conveyed to law enforcement.

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[11] I Love U Guys Foundation Standard Response Protocols