



Behavior Threat Assessment in Schools

Model Policy

This model policy establishes the mandatory statewide minimum Behavior Threat Assessment (BTA) requirements for all Maryland public schools, while preserving the local autonomy necessary to determine specific policy details. A local BTA policy must be developed using this model as a guide and formally adopted by the local Board of Education on or before December 1, 2027.

A local procedure serves as an essential companion to local Board of Education's policy by providing the specific, granular details on how assessments are conducted within the school system; however, local procedures shall not be used in place of an adopted local Board of Education policy.

Adopted by Maryland School Safety Subcabinet: **October 2026**

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PURPOSE

Senate Bill 1265 (Chapter 30), the Maryland Safe to Learn Act of 2018, requires that the School Safety Subcabinet provide K-12 public schools with a model behavior threat assessment policy. In accordance with §7-1507(c) of the Education Article, **local school system policies shall be aligned to the model policy** developed by the Subcabinet of the Maryland Center for School Safety (MCSS). Maryland's Model Policy for Behavior Threat Assessment was developed and distributed to local school systems in September 2018. The implementation of behavior threat assessment in Maryland schools and nationwide has advanced best practices since 2018 and necessitates revisions to the 2018 policy.

This 2026 model policy serves to provide guidance to local school systems in the ongoing development and administration of their own local school and school system behavior threat assessment teams and **replaces the 2018 model policy**.

DEFINITIONS

The local policy should define terms referenced within to provide clarity and support consistent implementation of practices across the local system. Definitions should align with their use in other local policies. A list of common behavior threat assessment terms and definitions is provided as an appendix for reference.

STRUCTURE AND SCOPE OF TEAMS

The local policy should include information about the structure of local behavior threat assessment teams in addition to the scope of work to be conducted by the teams for clarity and to support consistent implementation of practices across schools within the system.

Structure of Teams

The local policy must include a section that defines the method for the establishment of multidisciplinary teams in a manner that allows for rapid response and appropriate case review. Additionally, the local policy defines methods to provide individuals on a team with the knowledge and skills to appropriately perform their duties.

- **School-based multidisciplinary teams** should be flexible and adapt to include individuals with information relevant to the individual of concern. To satisfy the statutory requirement for "expertise in student counseling, education instruction, school administration, and law enforcement" (Md. Code Ann., Educ. Art. §7-1507(7)(ii)), core members must include school administrators, behavioral health professional(s), an educator with specific knowledge of the student (such as a case manager when the student has an IEP or 504), and law enforcement or designated school security official. The core team is part of all threat evaluations providing expertise and consistent implementation processes and procedures.

- A **central multidisciplinary team** should be established and include senior school system administrators, as well as those who work in mental health, student services, security, and human resources.¹
- Professional development for all multidisciplinary team members **must occur** in a way that enables individuals on the team to perform the duties defined within the local policy.

Scope of Work

The local policy must contain a section outlining the minimum expectations for multidisciplinary teams. These expectations can be further specified through detailed procedures, to include the following:

- Established **course of action** with defined time expectations to be taken in response to a behavior of concern report.
- Established **conditions that warrant** the school-based multidisciplinary team or central multidisciplinary team to convene for the purpose of evaluating information and determining the level of threat an individual poses.
- Defined types of **information to be gathered** and evaluated by the team to determine the level of threat an individual poses.
- Established protocol requiring a multidisciplinary team to make **a threat level determination** based on the totality of information available at the time.
- Defined **method for documentation** of information.
- Defined procedures for **case review** that include intervals of time that are commensurate with the threat level (high threat level equates to more frequent review).
- Defined **roles and functions of the central multidisciplinary team**, that may include providing oversight and assistance to school-based teams, and reviewing system-wide data trends.
- Established local procedures for the central multidisciplinary team that identify the appropriate personnel and protocols for **determining the threat level of an adult** exhibiting behaviors of concern.

¹ Maryland Center for School Safety “Behavior Threat Assessment Implementation Guide Expansion: Internal and Other Adults Threats”, September 2024. <https://schoolsafety.maryland.gov/Documents/Reports-Docs/Guidelines-Docs/MCSS-BTA-Implementation-Guide-Expansion.pdf>

PRIVACY CONSIDERATIONS

The local policy should include information about privacy considerations to support consistent implementation of practices across schools within the system. Multidisciplinary teams must operate in accordance with all state and federal privacy laws including the Family Educational Rights and Privacy Act (FERPA)² and the Health Insurance Portability and Accountability Act (HIPAA)³ recognizing when the health and safety **emergency exemptions** apply⁴, and acknowledging specific requirements for protecting others.

Duty to Warn

Local policy must define procedures for when a school official is aware that an individual poses a threat of violence to others and has a **duty to warn** the targeted person(s), or those responsible for the targeted person's care.

- The policy should include the person at the school who has the authority to warn a targeted person, or those responsible for their care;
- The policy should outline the information that the authorized person will share with the targeted person, or those responsible for their care; and
- The policy should outline the expected time frames in which initial contact and any necessary follow up contact must be made with the target, or those responsible for their care.

Duty to Inform

A **duty to inform** exists when a school official becomes aware of the transfer of a student who is being actively case managed as a result of a behavior threat assessment. Duty to inform applies when the student is transferring to another school system or being enrolled by the Local Education Agency in a nonpublic school program. Local policy must define procedures for sharing information in a manner to allow adequate time for the new school to review the information, make decisions concerning the safety of individuals at the new location, and support a successful transition for the student.

- The policy should include the person within the school system with authority to inform the new school system;
- The policy should outline the information that the authorized person will share with the receiving school system including the nature of the threat that resulted in the case management plan, current interventions, and any other pertinent safety information.

² U.S. Department of Education. *Family Educational Rights and Privacy (FERPA)*. <https://www.ecfr.gov/current/title-34/subtitle-A/part-99>

³ U.S. Department of Health and Human Services. *Health Insurance Portability and Accountability Act (HIPAA)*. <https://www.hhs.gov/hipaa/index.html>

⁴ U.S. Congressional Research Services. *Family Educational Rights and Privacy (FERPA) and Its Exceptions*. <https://www.congress.gov/crs-product/IF13155>

Record Retention

Local policy must define procedures for the retention of behavior threat assessment records that meet legal requirements of confidentiality and allow for future reference as warranted.

FURTHER CONSIDERATIONS

The local policy should include requirements for procedures outlined herein to be implemented by multidisciplinary teams for clarity and consistent implementation of practices across schools within the system.

Recognizing and Reporting Behaviors of Concern

Local procedure(s) to define the methods and requirements for certain individuals to recognize and report behaviors of concern. These include at a minimum:

- Providing information to school staff, students, and caregivers, related to **recognizing behaviors of concern** that may result in harm to self or others;
- Promoting a variety of methods by which individuals can **report a concern**, one of which must be an anonymous reporting system that is always available;⁵
- Requiring school personnel to **make an immediate report to school administrators, in-person or by phone/radio**, when they become aware of concerning behaviors that may indicate an individual is intending to harm themselves or others. If an individual believes a person or situation poses an imminent threat of serious violence or immediate life-safety emergency, they must immediately notify law enforcement and school officials.

Procedures and Other Considerations

Local procedures to provide for the consistent and valid application of behavior threat assessment principles.

- **Determine the behavior threat assessment model** or program that best meets local needs. Systems may create their own program based on established evidence-based models.⁶ The system's program should include procedures for each of the BTA stages; recognize, inquire, evaluate, and intervene.⁷

⁵ As of July 1, 2026, Maryland public schools shall participate in the State's Anonymous Reporting System, Safe Schools Maryland, or substantially similar platform. House Bill 326 (2026), Md. Laws Chapter 648.

⁶ National Threat Assessment Center. (2018) *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*. U.S. Secret Service, Department of Homeland Security.

<https://www.secretservice.gov/media/337/download?inline=true>

⁷ Maryland Center for School Safety. (2024) *Behavior Threat Assessment Implementation Guide Expansion: Internal and Other Adult Threats*. <https://schoolsafety.maryland.gov/Documents/Reports-Docs/Guidelines-Docs/MCSS-BTA-Implementation-Guide-Expansion.pdf>

- Define threat levels to distinguish the severity of a situation. These levels must clearly convey the **degree of concern** to local safety partners and directly inform safety and intervention planning.
- Maintain strict adherence to the **Individuals with Disabilities Education Act (IDEA)**.⁸ Local policy must explicitly state that the threat assessment process does not replace any aspect of IDEA. For students with an Individualized Education Program (IEP), the behavior threat assessment may trigger a parallel review, including a manifestation determination and an update to the Functional Behavioral Assessment (FBA) and Behavior Intervention Plan (BIP).
- Establish protocols for **caregiver engagement**. Local policy must define when and how to involve a student's caregiver(s) as critical partners as they can provide valuable information that informs next steps. They are also essential to support safety planning and interventions following a determination of threat level. Local policy should define expectations for when school officials provide opportunities for the student's caregivers to engage in the process so as to foster positive outcomes for the student and school.
- Maintain a distinction between **behavior threat assessment and suicide/self-harm risk assessment**. Procedures must sustain the integrity of these as unique and separate processes. While a threat of violence to others may trigger a parallel suicide screening, the processes must not be combined, and concerns solely regarding self-harm must be addressed in alignment with current suicide prevention practices.
- Differentiate between **behavior threat assessment and student discipline** (COMAR 13A.08.01.11). Local policy must clarify that these are two distinct processes. While an incident may trigger a parallel disciplinary review, the behavior threat assessment process does not dictate exclusionary discipline or change-of-placement determinations.
- Define procedures to “**coordinate among** school officials and law enforcement, mental health, and other appropriate entities to monitor and respond to information about behavior, statements, or plans that may pose a threat of violence at a school,” Md. Code Ann., Educ. §7-1507(b)(7)(i). Furthermore, the policy must establish a clear threshold for when law enforcement will be asked to support or take over a behavior threat assessment. This ensures that law enforcement can provide collaborative input at the onset of a behavior threat assessment without their presence necessarily requiring formal law enforcement action.⁹

⁸ U.S. Department of Education. (1975) *Individuals with Disabilities Education Act*. <https://sites.ed.gov/idea/>

⁹ The National Threat Assessment Center, “Enhancing School Safety Using a Threat Assessment Model” 2018. <https://www.secretservice.gov/media/337/download?inline=true>

Intervention and Case Management

Local procedure(s) to include methods and requirements that provide interventions and support for individuals that increase prosocial behaviors and the likelihood of future success.

- Interventions and safety plans are individualized and designed with an understanding of the underlying grievance and/or skill deficit. Schools should utilize their existing **Multi-Tier System of Support (MTSS)**¹⁰ to develop interventions and safety plans. The use of existing school practices and procedures increases implementation fidelity.
- Interventions and safety plans must be monitored by a designated **case manager**. The case manager should report progress, new behaviors of concern, and additional information regarding the individual to the multidisciplinary team as necessary and within given timelines. Ongoing case management should occur regardless of the student's educational placement (e.g., alternative school, virtual learning, expulsion).
- The interval of time to monitor progress should be **commensurate with the level of threat determined** by the multidisciplinary team. Every open case must be reviewed at least once within 30 school days to consider the following:
 - Compliance with safety plan conditions;
 - Intervention progress; and
 - Review of up-to-date information previously used to inform the threat level determination.
- The frequency and method of recording updates until interventions and safety measures are no longer needed and the case is resolved should be defined. Procedures are defined for the resolution and closure of a case including documentation methods.

¹⁰ "Maryland schools are expected to implement Multi-Tiered Systems of Support (MTSS) to create responsive learning environments. MTSS is a proactive, data-informed framework that provides academic, behavioral, and social-emotional support to all students, including multilingual learners, students with disabilities, and those from historically underserved communities." <https://marylandpublicschools.org/about/Documents/DCIPL/Frame-Multi-Tiered-System-Supports-A.pdf>.

References

United States Congressional Research Services. *Family Educational Rights and Privacy (FERPA) and Its Exceptions*. <https://www.congress.gov/crs-product/IF13155>

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National Threat Assessment Center. *Aligning Behavioral Threat Assessment and Management with Multi-Tiered System of Support*. U.S. Secret Service, Department of Homeland Security, 2025. <https://www.secretservice.gov/sites/default/files/reports/2025-08/Aligning-Behavioral-Threat-Assessment-And-Management-With-A-Multi-Tiered-System-Of-Support.pdf>

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School Safety. Gov <https://www.schoolsafety.gov/targeted-violence>

U.S. Department of Education. *Family Educational Rights and Privacy (FERPA)*. <https://www.ecfr.gov/current/title-34/subtitle-A/part-99>

U.S. Department of Education. *Individuals with Disabilities Education Act, 1975*. <https://sites.ed.gov/idea/>

U.S. Department of Health and Human Services. *Health Insurance Portability and Accountability Act (HIPAA)*. <https://www.hhs.gov/hipaa/index.html>

U.S. Department of Justice. Criminal Resource Manual 1000-1499, 1072.

<https://www.justice.gov/archives/jm/criminal-resource-manual-1072-special-considerations-proving-threat>

Appendix: Definitions

Behavior Threat Assessment (BTA)

Behavior Threat Assessment is a systematic process designed to recognize, inquire, evaluate and intervene to prevent violence. The process is designed to gather a holistic picture of an individual who may be on the pathway to violence and design a plan to mitigate harm.

Behavior of Concern

An expression of an intent to cause physical harm to someone, a threat. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means. A threat is considered regardless of whether it is observed or communicated directly to the target of the threat or observed by or communicated to a third party.

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.

Multidisciplinary Team

Refers to a group of individuals with different roles and perspectives operating as a group valuing the contribution each brings.

Recognize

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.

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.

School Safety Partners

A term used to be inclusive of adults who play a role in keeping schools safe to include; caregivers, students, school staff, coaches, law enforcement, clergy, business leaders, after care program staff, as some examples.

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

Target violence refers to violence that is premeditated and directed at specific individuals, groups, or

locations.¹¹

Threat

A legal threat is a communicated intent to inflict unlawful injury, pain, property damage, or other hostile action against a person or group. It is defined as a “true threat”, not protected speech, when it is a serious expression of intent to commit unlawful violence, causing fear, and requires a statement conveying purpose.¹²

Threat Evaluation

Threat evaluation occurs when a multidisciplinary team meets to share and analyze available information about an individual who displayed behavior(s) of concern to determine whether the individual is on the pathway to violence and the level of threat the individual poses.

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 decide how best to proceed in response to reports of an individual displaying concerning behavior.

¹¹ School Safety. Gov <https://www.schoolsafety.gov/targeted-violence>

¹² U.S. Department of Justice. Criminal Resource Manual 1000-1499, 1072. <https://www.justice.gov/archives/jm/criminal-resource-manual-1072-special-considerations-proving-threat>