

2625-NORTH COUNTY CHARTER SCHOOL THREAT MANAGEMENT POLICY

Effective Date:

North County Charter School (the “School”) shall establish a threat management team in accordance with Section 1006.07(7), Florida Statutes. The primary purpose of a threat management team is to minimize the risk of violence at the school. The threat management team is responsible for the coordination of resources and assessment and intervention of individuals whose behavior may pose a threat to the safety of school staff or students.

A. Definitions.

- “CSTAG” means the Comprehensive School Threat Assessment Guidelines behavioral threat assessment instrument, Form CSTAG-2022, which must be used for threat assessments in the School through December 31, 2023. The CSTAG categorizes threats as (1) transient, meaning a threat without a sustained intent to harm that can be easily resolved by apology, retraction, or explanation; or (2) substantive, meaning a threat where the intent to harm is either present or unclear, and requires protective action.
- “Florida Harm Prevention and Threat Management Model” or “Florida Model” means the Florida-specific behavioral threat management process required by Section 1001.212(12), F.S. The Florida Model consists of the Florida 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.
- “School-based mental health services provider” means a school psychologist certified under Rule 6A-4.0311, F.A.C., a school social worker certified under Rule 6A-4.035, F.A.C., a school counselor certified under Rule 6A-4.0181, F.A.C., or a mental health professional licensed under Chapter 490 or 491, F.S., who is employed or contracted by a district or school to provide mental health services in schools.
- “Student Support Management Plan” or “SSMP” means an ongoing intervention and monitoring plan implemented by the threat management team. The SSMP may impose requirements on a student of concern for a defined period of time based on the level of concern. The SSMP is reviewed each month by the threat management team.
- “Reasonable effort to notify” means the exercise of reasonable diligence and care to make contact with the student’s parent or guardian, typically through the contact information shared by the parent or guardian with the school or school district.
- “Threat Assessment” means the protocols used to assess concerning behavior and threats. Threat assessment protocols are a series of documents, also referred to as a “threat assessment instrument,” comprised of an intake and disposition form; student of concern questionnaire; parent/guardian questionnaire; witness/target of violence questionnaire; teacher survey; and mental health assessments used to help evaluate whether behaviors or communications indicate that a student poses a risk of harm and what services are appropriate to mitigate that risk. The threat assessment process results in comprehensive information gathering from multidisciplinary sources, including law enforcement, mental health, and school records.
- “Threat Management” means the 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. 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. The SSMP is part of the threat management process. The threat management process is ongoing and ends only when the threat management team deems ending the process appropriate under the circumstances, or responsibility is transferred to another threat management team.

B. Responsibilities of the Threat Assessments on or Before December 31, 2023

Threat assessments initiated on or before December 31, 2023, must be done in accordance with CSTAG and the Model Behavioral Threat Assessment Policies and Best Practices for K-12 Schools, as follows:

- Each school must have a threat management team that includes persons with expertise in counseling, instruction, school administration, and law enforcement, who meet the requirements of Rule 6A-1.0019, F.A.C.
- Through December 31, 2023, threats will be assessed using the CSTAG instrument to assess the behavior of persons who may pose a threat to school staff or students and to coordinate intervention and services for such persons. All reported threats, even those determined not to be a threat, must be documented, including the evaluation process and any resultant action.
- The threat management team can meet as often as necessary but must meet monthly to fulfill its duties of assessing and intervening with persons whose behavior may pose a threat to school staff or students. Each meeting must have a record of those in attendance, the case(s) discussed, action(s) taken, and the meeting date and time.
- The threat management team must refer individuals for crisis intervention or mental health services as necessary pursuant to Section 112.584(4), F.S., and refer for self-harm as necessary pursuant to Section 394.463, F.S.
- The threat management team must report quantitative data about the threat assessments team's activities to the Office of Safe Schools, as required by law.

C. Responsibilities of the Threat Assessments on or After January 1, 2024

Beginning January 1, 2024, threat management and assessment of concerning behaviors or communications must be conducted in accordance with the Florida Model, as follows:

- The school must have a threat management team comprised of four members, at a minimum, including persons with expertise in counseling, instruction, school administration, and law enforcement. The Principal is responsible for appointing team members. The threat management team must also include a member with personal knowledge of the student of concern who is the subject of threat management. Team members must meet the following requirements:
 - The counseling team member must be a school-based mental health services provider that is able to access student mental health records.
 - The instructional team member must meet the definition of instructional personnel under Section 1012.01(2)(a)-(d), F.S., or must hold a current Florida Educator Certificate under Section 1012.56, F.S.
 - The School administrator team member must meet the definition of administrative personnel found in Section 1012.01(3), F.S. This should not be the Principal unless they are the only administrator at the School.

- The law enforcement team member must be a sworn law enforcement officer who meets the requirements of Rule 6A-1.0019, F.A.C.
 - If none of the team members are familiar with the student of concern, the Chair of the threat management team must assign an instructional staff member who is familiar with the student to consult with and provide background information to the threat management team.
 - The Principal must appoint a Chair and Vice Chair of the threat management team. 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 threat management team. The Vice Chair will serve as Chair when the Chair is unavailable.
- The threat management team must follow the following procedures in accordance with state law and administrative rule:
 - The threat management team must use the Florida Model to 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 or concerning behaviors and communications, even those determined to be unfounded, must be documented by the threat management team along with any resultant action, using the Florida Model Instrument.
 - The threat management team can meet as often as necessary but must meet at least monthly to fulfill its duties of assessing and intervening with persons whose behavior may pose a threat to school staff or students. Each meeting must have a record of those in attendance, the case(s) discussed, action(s) taken, and the meeting date and time.
 - The threat management team must refer individuals for crisis intervention or mental health services as necessary pursuant to Section 112.584(4), F.S., and refer for self-harm as necessary pursuant to Section 394.463, F.S.
 - The threat management team must report quantitative data about the threat assessments team's activities to the Office of Safe Schools, as required by law.

D. Training Requirements

By December 31, 2023, all members of the threat management team must be trained on the Florida Model through training provided by or approved by the Office of Safe Schools. By December 31, 2023, School principals, the Threat Management Chair, and the Vice Chair must complete additional training specific to their respective roles. Beginning with the 2024-2025 school year, team members who have not previously completed training must complete Florida Model training before the start of the school year. Those appointed to threat management teams after the start of the school year must complete Florida Model training within sixty days of appointment. Beginning with the 2024-25 school year, team members who have been fully trained in a previous school year must complete an annual refresher training provided by the Office of Safe Schools within the first sixty days of school.

E. Notification

The School must notify in the following circumstances:

- If the threat management team Chair determines the report of a concerning behavior or threat carries a Low level of concern and summarily closes the case, the Chair must use reasonable efforts to notify the parent or guardian of the student of concern.
- If the Chair does not summarily close the case and refers it to the threat management team, reasonable efforts must be made to notify the student of concern's parent or guardian on the same day the threat management team assigns the preliminary level of concern.
- If the preliminary level of concern is High, the threat management team Chair must notify the superintendent or designee to ensure that the notice requirements of Section 1006.07(7)(e), F.S., are met.
- 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.
- Once an SSMP is finalized and any time it is substantively revised, the threat management team Chair must provide a copy of the SSMP to the student of concern's parent or guardian. The targeted student's parent or guardian should also be informed that an SSMP has been implemented.
- Where a report of concern includes an identified student target, the Chair must make a reasonable effort to notify the parent or guardian 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. As provided for in the Florida Harm Prevention and Threat Management Manual, the unfounded summary disposition should only be used when it is clear and articulable that there is no basis for concern. If there is any doubt, the case should be forwarded to the threat management team for further evaluation and parent notification should occur.
- Nothing herein prevents the school from notifying parents or guardians if they believe it is in the best interest of the student.

The threat management team Chair must document all attempts to make contact with the parent or guardian. Timelines for required notice may be modified where the threat management team reasonably believes and documents that such disclosure would result in abuse, abandonment, or neglect, as defined in Section 39.01, F.S.

F. Reporting & Sharing Information

- Threat assessments and records related to threat management are considered education records as defined by the Family Educational Rights and Privacy Act (FERPA) and Sections 1002.22 and 1002.221, Florida Statutes. Policies relating to access, maintenance, and retention of these records must be consistent with Rule 6A-1.0955, F.A.C., Education Records.
- Upon a preliminary determination by the threat management team that a student poses a threat of violence to himself or herself or others or exhibits significantly disruptive behavior or need for assistance, authorized members of the threat management team may obtain criminal history record information about the student. A member of a threat management team may not disclose any criminal history record information obtained pursuant to this section or otherwise use any record

of an individual beyond the purpose for which such disclosure was made to the threat management team.

- All school personnel will report to the Principal about any individual who is suspected of posing a threat to school safety. If the threat is imminent, the Principal may take any necessary action to avert a crisis situation but will report the incident to the threat management team as soon as feasible. Otherwise, the Principal will convene the threat management team to assess the threat.
- Upon a preliminary determination that a student poses a threat of violence or physical harm to himself or herself or others, the threat management team shall immediately report its determination to the Principal, or his or her designee. The Principal, or his or her designee, shall immediately attempt to notify the student's parent or legal guardian. Nothing in this subsection shall preclude school personnel from acting immediately to address an imminent threat.
- The School will comply with all data reporting requirements as required by applicable law and administrative rules.

Board Secretary Certificate

I hereby certify that the foregoing policy was adopted by a majority vote of a quorum of the Governing Board of Directors at a duly noticed meeting held on October 9, 2023.

Board Secretary

Mrs. Maria Smith
Printed Name

October 9, 2023
Date