



Missouri Governor's School Safety Task Force

Final Report

Appendix D

Federal White House Commission on School Safety

Synopsis of Recommendations for State & Local Communities

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White House Federal Commission on School Safety

Synopsis of Recommendations for State and Local Communities

The following is a compilation of recommendations for state and local communities, by focus area, aligned with the Missouri School Safety Task Force “focus areas”, from the White House Federal commission on school Safety Report. The complete White House Report can be downloaded at: <https://www2.ed.gov/documents/school-safety/school-safety-report.pdf>

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A: Effective Communication and Information Sharing

1. Effective Communications programs

Beyond the school building and campus, informed and alert communities play a critical role in keeping our schools safe. Prior to most attacks, other students had concerns about the attacker, yet most did not report what they knew to a parent or other responsible adult. Out-reach campaigns such as “If You See Something, Say Something®” and similar state-specific programs are essential to encouraging and facilitating the reporting of suspicious activities or other concerning behaviors. There are significant opportunities to customize or expand such efforts.

Recommendations:

State and Local Communities

Effective communication systems and rapid dissemination of information can save lives during an incident or event. Schools should establish and maintain effective communications systems (e.g., one-way intercoms or two-way radios) to rapidly provide alerts, warnings, or other key information during an incident.

Schools should test their communications equipment and methods during training and exercises.

States and localities should also undertake efforts to ensure interoperability of local law enforcement and school communications equipment.

2. Crisis Communications - Effects of Press Coverage of Mass Shootings

Press coverage of school shootings is often sensational, which can exacerbate the trauma of those directly and indirectly affected and potentially incite successive events. Researchers have found that most shooters desire fame and wish to emulate other mass shooters.

Social media only amplifies this problem. In the absence of traditional journalistic tools—like editorial discretion—social media allows for the wide dissemination of information, where nearly every individual can be a contributor and a consumer (including would-be shooters).

The Society of Professional Journalists’ Code of Ethics suggests a “heightened sensitivity” when it comes to the coverage of crime victims and families. It recommends that journalists “balance the public’s need for information against potential harm.” Survivors of the Parkland shooting have encouraged more journalists to adhere to this code.

Recommendations:

States and Local Communities

- State, local, and school leaders play a critical role in developing any crisis preparedness, response and recovery plan. They should include a media plan as well. Those who have already done so should continually review and revise their plans. The media portion of these plans can cover a number of issues, including:
 - who will talk to the press after a tragedy,
 - what information should be released (including considerations for the level of detail, existing safety measures, and details about any forthcoming notifications to families),
 - how to communicate through a variety of media vehicles (e.g., press conference, press release, social media), and
 - when designated individuals should talk to the media, including if families should be contacted first and when media are permitted to enter school grounds.
- As they examine their media plans, schools should coordinate with local law enforcement and other community leaders on a regular basis to ensure consistent messaging and clear lines of authority. States and local communities can take advantage of support that the U.S. Department of Education’s Office of Safe and Healthy Students administers from the Readiness and Emergency Management for Schools (REMS) Technical Assistance Center. It provides some tools that school districts can use to assess the safety, security, accessibility, and emergency preparedness of school buildings and grounds. The Center also offers tips to help guide school officials in preparing, developing, and ultimately implementing high-quality school emergency operations plans along with other actionable resources. The Center’s website (<https://rem.ed.gov/>) is updated frequently.
- National and local media outlets should consider adopting the “No Notoriety” campaign. State and local authorities should consider employing the principles of “No Notoriety” when communicating the facts of a school safety incident to media outlets.

B: Mental Health/Behavioral Risk

1. Issues of Mental Health and Counseling

A U.S. Department of Education and U.S. Secret Service analysis found that as many as a quarter of individuals who committed mass shootings had been in treatment for mental illnesses, and more than three-quarters had symptoms of a mental illness prior to the time of the shooting. That said, there is little population-level evidence to support the notion that those diagnosed with mental illness are more likely than anyone else to commit gun crimes.

Although the presence of a mental illness may not be directly correlated to violence, trends with respect to youth mental illness are of great concern.

Additionally, the alleged Parkland shooter had experienced numerous instances of difficulties in the community and with his family, including violence against animals and toward his mother and others. Social isolation also appeared to be a factor in the Parkland case. The alleged shooter was reported to be lonely, ostracized, and volatile.

There is an urgent need to reduce risk for youth mental, emotional, and behavioral difficulties through the implementation of efficacious and effective prevention interventions, as well as identify youth at risk for mental illness in schools and connect them with needed treatment and services. This includes efforts to increase basic mental health literacy, particularly for those working with young people.

Most communities and schools lack high-quality treatment for children and adolescents, however. Up to 79 percent of school-age youth have unmet mental health needs.

Integrating mental health prevention and treatment services and supports into schools can provide many benefits, including reducing risk for mental health disorders and increasing access to care for those who need treatment while reducing the stigma of seeking help. It can also help provide early identification, intervention, and a full continuum of services while using a multidisciplinary approach.

Comprehensive school-based mental health systems (CSMHS) are school-community partnerships that provide a continuum of mental health services (such as prevention, early identification, and treatment) that support students, families, and the school community. They seek to improve the school climate and can decrease social isolation and marginalization, including bullying. Key aspects include evidence-based universal prevention; training for school and community members to identify and respond to early warning signs of mental health difficulties; and targeted prevention and treatment intervention programs and services supporting the mental health of students. Mental health care delivery is integrated within school settings.

Recommendations:

States and Local Communities

- All appropriate state and local agencies should continue to increase awareness of mental health issues among students and ways to seek needed care. Often, stigma is associated with the lack of seeking help for a mental health condition. Stigma is often the reason that individuals needing help choose not to seek treatment.
- Schools and local behavioral health agencies should increase training of adults who interact with children (e.g., caregivers, preschool staff) to recognize signs and symptoms of mental illness. This is an imperative step in enhancing school-based mental health services. The Early Childhood Mental Health Consultation model trains such adults to identify early signs of mental health conditions and to respond appropriately. Additionally, training can be enhanced through the development of a network of national and regional technical assistance centers for children, adolescent and youth school-based mental disorder prevention and treatment. The network should assist states and localities in adopting mental health promotion activities, including suicide prevention and clinical treatment provision. It would work in collaboration with the SAMHSA-established national network of Technology Transfer Centers in Prevention, Addiction, and Serious Mental Illness. Trainings to increase mental health literacy to recognize signs and symptoms of mental illness, such as Mental Health First Aid, also provide key resources for individuals working with children. Distribution of tools and resources, including the SAMHSA-developed PowerPoint “Assessing and Addressing Risk of Violence in Youth,” to all school districts and college campuses, could also be considered.
- State and local school districts in collaboration with social service, faith based, primary care and law enforcement agencies should develop and implement comprehensive and coordinated approaches that are inclusive of all systems involved in service provision. This is a critical factor in addressing school-based mental health in the most efficient way possible. The systems of care (SOC) framework is an approach that explicitly includes all systems that are involved with providing services to children and is a proven best practice in providing comprehensive, community-based mental health prevention, treatment, and support services to youth with SED or SMI and their parents and families. Examples of the types of systems in an SOC approach are social services, education and juvenile justice. Youth and transition-aged youth receiving services in SOC programs may include those experiencing an FEP, those with SED or those with SMI. Recipients of SOC services have demonstrated significant improvements in behavioral and emotional functioning; significant reductions in thoughts of suicide and suicide attempts; significant reductions in unlawful activities; and significant cost reductions due to decreases in hospitalizations and arrests.
- State and local behavioral health agencies should increase the availability of high-quality community-based services such as Certified Community Behavioral Health Clinics and crisis/acute care services (e.g., mobile teams, inpatient care), as needed. These services could include evidence-based practices, trauma-

informed services, multidisciplinary team-based approaches, recovery supports, and medication-assisted treatment, where indicated.

- State and local school districts should engage and activate natural supports in communities. It is not enough simply to engage law enforcement, healthcare and schools. Other supports, such as the faith community, can help identify and support youth with SED and refer them to needed treatment. Although the school system plays an integral role in ensuring the sound mental health of its students, a holistic community approach is needed. Community partnerships contribute to the success of the expansion of school-based mental health.
- State and local school districts should increase the use of technology, including tele-mental health infrastructure, to increase access to services for individuals in underserved or rural areas. Telehealth service provision and care extension strategies include collaborative models of medical education and support to manage patients with complex conditions such as the Extension for Community Healthcare Outcomes (ECHO) type model. These models have been very effective in serving hard-to reach populations and areas. Telehealth provides a means to treatment access for those who might otherwise not be able to access it.

2. Integrating Mental Health, Primary Care, Family Services and Court-Ordered Treatment

Students often come to school with multiple complex health, mental health, and social service needs. Schools can play an important role in curating healthy environments that seek to prevent and mitigate the onset of health and mental health conditions. Developing and promoting models in which mental health and substance use screening, treatment, and support services are integrated into school and pediatric settings can help to ensure that children, youth, and adolescents with needs (along with their families) are identified earlier and gain access to treatment and other support services.

Studies show that the way to integrate services and shift the overall school culture to support these services is to develop and implement a plan that works with other important school issues and supports the goals of education. In general, the most successful integration programs include buy-in from committed and dedicated leaders, and exhibit effective communication and collaboration among the integrated care team. A significant amount of research demonstrates that treatment is much more likely to be effective and completed when services are school based.

Pediatric primary care

Care coordination is a key part of the SAMHSA (Substance Abuse and Mental Health Services Administration) Systems of Care model. This is a recommended approach for working with children and their parents/ caregivers as they navigate complex multisystem agencies and services. Involving the family in the care of their children and adolescents by including them in the services and supports provided in schools or in pediatric primary care settings is an essential part of providing integrated care. Parents

and the family play a key role in supporting any interventions. Families should be engaged in the development and implementation of treatment services in a meaningful way.

Prevention and early intervention programs to divert youth from the Justice System

Prevention services that address mental health conditions and divert youth from the juvenile justice system are an essential part of an effective continuum of services. Prevention strategies include: education for both the family and the youth on key issues such as substance use, social skill development, support for academic achievement, connection to family and other adults, and close and positive relationships with peers, as well as services and supports for the family, among other interventions.

Students with disabilities, including those with mental and substance use disorders, are more likely to be involved in disciplinary actions at school and are more often suspended or expelled. These actions can have a significant negative impact on a young person and may result in social disconnectedness as well as law enforcement and/or juvenile justice involvement. Once a youth becomes involved in the juvenile justice system, receiving needed treatment is challenging.

Ensuring that at-risk youth receive timely and appropriate prevention and early intervention services is highly recommended as a best practice.

Recommendations:

States and Local Communities

- State and local school districts and state and local behavioral health and health agencies should work together to promote screening and early intervention for mental/substance use disorders in all settings by increasing education and awareness of the importance of these services; by supporting the use of evidence-based screening tools and instruments; and by supporting increases in funding for behavioral health professionals in all settings.
- State and local school districts and state and local behavioral health and health agencies should work together to support evidence-based care coordination models that ensure a thorough assessment and provide referral, follow up, communication, and ongoing collaboration among and between agencies and providers by working with all public and private payers to provide coverage for these services.
- State and local school districts should expand the implementation of tiered models that intentionally focus on school climate and incorporate social and emotional learning and prevention, as well as access to specialty treatment for the minority of children who require it. WSCC, MTSS, and PBIS are examples of these systematic models.
- Law enforcement agencies in collaboration with state and local school districts and state and local behavioral health agencies should develop clear guidance for

law enforcement, courts, juvenile justice systems, and jails around developing supportive partnerships with schools to implement effective diversion programs, identifying individuals who could benefit from participation in such programs, and implementing proper procedures for identifying mental and substance use disorders. This guidance can identify specific mechanisms and related practices for diversion at various stages (or intercepts) in the criminal and juvenile justice systems, including pre-arrest, pre-booking, arraignment, and juvenile court.

- State and local behavioral health agencies in collaboration with state and local school districts should expand Multi-Systemic Therapy and other evidence-based treatment modalities to most effectively treat youth at risk of incarceration. Multiple controlled trials of MST report significant reductions in rates of recidivism and conduct problems.
- State policymakers should examine AOT laws in states with attention to consideration of lowering the commitment threshold for AOT in youth with untreated and unstable mental illness. This is so that an appropriate level of care can be mandated (a) for youth with mental health conditions who would clearly benefit from treatment for a mental illness but have a pattern of not engaging with treatment; and (b) where that treatment would improve the overall condition and reduce the risk of harm to themselves or those around them.
- State policymakers should consider redefining specific terms currently used in most civil commitment state statutes. For the involuntary commitment of an individual due to suicidality, homicidality or grave disability, the terms “gravely disabled” and/or “imminent danger” are currently used. States should consider whether statutory modifications to incorporate language such as “mental status reasonably foreseeable to be likely to be associated with suicidality, homicidality, or grave disability” would lead to better public policy outcomes. Such a standard, for example, may help secure the involuntary hospitalization and treatment of individuals before they act on thoughts of harm to themselves or others—or the occurrence of other behaviors resulting from impairment produced by untreated mental illness likely to lead to incarceration or other adverse events.

3. The Effectiveness and Appropriateness of Psychotropic Medication for Treatment of Troubled Youth

Recommendations:

States and Local Communities

- State and local behavioral health agencies, in collaboration with state and local school districts, should increase access to good treatment through increasing opportunities to access a full array of treatment services in schools. The provision of treatment delivery in schools is imperative to addressing the needs of youth with complex mental health needs. The direct availability of these services in the school setting reduces barriers to access and ensures easy access to mental health service provision.

4. Behavioral Risk - Using Suspicious Activity Reporting and Threat Assessments to Enhance School Safety

Informed, alert communities play a critical role in keeping our nation safe. By reporting suspicious activities, individuals may be providing the information authorities need to stop an attack before it occurs. This is especially true in relation to school attacks. Studies have shown that, prior to the incident, most attackers engaged in behavior that caused others concern and that others knew about the attacker's ideas or plan to attack. Indeed, before the Parkland shooting, multiple reports were allegedly received about the shooter's concerning behavior. How they were processed, evaluated and acted upon remains under review. What is certain is that effective programs addressing suspicious activity reporting and threat assessment can significantly reduce—or prevent—violence.

The school threat assessment process essentially involves a three-step model in which a team identifies students of concern, gathers information about their behavior and circumstances to assess whether they pose a risk of harm to themselves or the school community, and develops a management plan to mitigate that risk. Threat assessment does not definitively predict whether someone will commit an act of violence. Rather, its goal is to evaluate the risk an individual may pose and implement intervention strategies to address concerns.

Recommendations:

States and Local Communities

- States, school districts, and individual schools should establish and provide training on a central suspicious activity reporting system that is continually monitored, allows anonymous reporting, and has procedures in place to ensure proper action is taken on each report. Funds may be available through the STOP School Violence Act of 2018 to assist in developing these systems. The reporting system could be supplemented by an education and awareness campaign that encourages students, teachers, and other members of the school community to report their concerns, provides guidance on what types of activities should be reported, and provides instructions on the various options for submitting a report.
- School districts and individual schools should establish threat assessment teams and develop comprehensive targeted violence prevention programs. States and localities should consider encouraging and supporting this activity in whatever manner they determine to be the most appropriate. This may include the enactment of legislation mandating that school districts or schools take these actions, the establishment of state or local teams to provide training to school administrators and staff on these activities, and/or the provision of grants or other funds to schools to support these activities.

- School districts and individual schools should establish comprehensive targeted violence prevention programs supported by multi-disciplinary threat assessment teams as outlined in the U.S. Secret Service guide *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*. Schools may be able to receive funds through the STOP School Violence Act of 2018 to assist in establishing these programs. To establish a comprehensive violence prevention program, it is recommended that schools/school districts perform the following steps:
 - Establish a multi-disciplinary threat assessment team consisting of highly trained school professionals from a variety of different disciplines (e.g., teachers, administrators, school resource officers, school psychologists, guidance counselors) who, among other things, will conduct threat assessments, assess a student’s potential for violence, and develop intervention and management strategies to mitigate that risk.
 - Define concerning behaviors that initiate the need for a threat assessment (e.g., sudden or dramatic changes in mood, appearance, or behavior) and prohibited behaviors (e.g., harassment, bullying, carrying a weapon on school property) that initiate immediate intervention. There should be a low threshold for defining concerning behaviors so that protocols address a continuum of behaviors, not just direct threats or behaviors indicative of planning for an attack.
 - Establish and provide training on a central reporting system.
 - Determine the threshold for law enforcement intervention.
 - Establish replicable threat assessment procedures to include practices for maintaining documentation, identifying sources of information, reviewing records, and conducting interviews with an emphasis on rapport building.
 - Develop risk management options to enact once an assessment is complete and individualized management plans to mitigate identified risks and enhance positive outcomes for students of concern.
 - Create and promote a safe school climate.
 - Provide training for all stakeholders.
- As numerous witnesses noted to the Commission, students themselves must be part of the solution and often can help identify the best ways to communicate with and educate their peers. In recognition of that, school districts and schools should empower students by increasing engagement with students in the development of school security campaigns.

C: School Climate & School Culture

1. Character Development and Developing a Culture of Connectedness

Because so many of the gunmen responsible for campus mass shootings were detached, withdrawn, depressed and/or isolated, the report stresses the importance of increasing connectedness in the classroom, improving school climate, providing positive behavioral interventions and supports, and fostering social and emotional learning. It also covered the prevalence of bullying and cyberbullying in schools, which can lead to depression, anxiety, family problems, academic difficulties, delinquency, school violence, and suicidal thoughts and attempts.

Recommendations:

State & Local Communities

1. States should provide resources for their schools to help create a positive school climate where students feel connected to, rather than isolated from, their teachers and fellow students.
2. States should support character education programs and expand those already in existence using various federal or state funds.
3. Schools and districts should adopt effective social and emotional learning (SEL) strategies
4. Schools and districts should use a variety of data sources, including school climate surveys, to guide the selection of evidence-based interventions tailored to their specific needs.
5. Schools and districts should adopt tiered social, emotional, and behavioral supports to establish a climate that appropriately supports and responds to student behavior.

2. Cyberbullying and School Safety

1. Many states, districts, and schools are creating their own, innovative approaches to cyberbullying. These practices, many of which are still in the process of being evaluated, could show promise for preventing and/or addressing cyberbullying. States should adopt similar and effective practices or develop their own. The report then highlights examples from Sioux City, Iowa, Seattle, Dear Park, Texas, Poughkeepsie, N.Y., Pennsylvania.
2. States, districts, and schools should adopt policies to help prevent cyberbullying, such as school climate initiatives and support for digital citizenship and character development. Because of the importance of peer influence, schools can consider ways to have these efforts led by students.
3. States, districts, and schools should use appropriate systems to monitor social media and mechanisms for reporting cyberbullying incidents. Examples include Michigan's OK2SAY and Colorado's Safe2Tell programs

D. Emergency Operations Plans

1. Emergency Operations Plan

A school's emergency operations plan should center on regular engagement between schools, school districts, and first responders. Collaboration increases the efficiency and effectiveness of response to school-based incidents by providing first responders with the information required to navigate and secure a campus during an incident. Any reduction in the time between the beginning and end of an incident can save lives.

Emergency operations plans must describe the actions that students, teachers, and school staff will take during an emergency. Actions may differ significantly depending upon the type of emergency. These differences should be outlined clearly according to the different threats and hazards. Everyone in the school should have a common understanding of what will be expected of them during an emergency—students, teachers, and school staff as well as parents, substitute teachers, coaches, and any contracted workers on the school campus. All areas of the school should be included in the planning, such as auxiliary locations for which the school is responsible and for any events that occur outside of regular school hours or school days.

Informing students, teachers and school administrators of the practices outlined in a security or emergency operations plan is just as important as developing the plan in the first place. Training provides the most effective way of educating everyone on their roles and responsibilities during an emergency. An effective plan requires meticulous practice and stakeholders trained in executing the plan

Recommendations:

State and Local Communities

1. All school districts and/or individual schools should develop and implement emergency operations plans in accordance with the Guide for Developing High Quality School Emergency Operations Plans, or other similar guidance. Indeed, according to a U.S. Government Accountability Office's 2015 survey of the 50 states and the District of Columbia, only 32 of the 51 state education departments surveyed indicated that their state required school districts to have emergency operations plans. When designing their security and emergency operations plans, schools should consider security for before school, after school, during extra-curricular activities, and other times when classes are not in session. States and localities should consider supporting these efforts by providing dedicated funding for the development and implementation of emergency operations plans. States and localities should also consider requiring individual schools within their jurisdiction to develop and implement emergency operations plans.

E. Physical Security/Technology & Safety Assessments/Audits

1. Best Practices for School Building Security

The Commission identified various components of an effective approach to enhancing the security of schools. These include practices that have proven successful at either the school, school district, or state government level. Special emphasis was laid on proven plans to establish a sound security management program and enhance physical security at access points (including building façade) and in the context of the classroom.

Security management team

To oversee proper development and implementation of a comprehensive school safety and security program, school districts and individual schools should consider first establishing a security management team and designating a team lead. The team should include individuals with a management, oversight, or other significant role in the security of the school, such as the principal or vice-principal, the designated emergency manager, and, if the school has one, the school resource officer.

In addition, every school district and individual school should try to develop a coalition from the community for the common purpose of enhancing the safety of students and the security of schools.

A school's security community of interest begins with its teachers, administrators, counselors, other staff, parents, and students, and also includes external partners like local first responders, social workers and elected officials. These groups can collaborate to develop emergency operations plans that establish protocols for handling all types of potential hazardous incidents, including natural disasters, accidents, and deliberate attacks like an active shooter. A strong coalition can help carry the message to the rest of the community and minimize resistance to necessary security measures.

A school's security management team should first consider conducting a risk assessment to determine needs, identify vulnerabilities, and develop a security strategy. A risk assessment can be conducted internally, in conjunction with local law enforcement, or by a specialized third-party security firm.

Building hardening and other physical improvements

Three key areas comprise the physical aspects of schools: the campus, the buildings on the campus, and the classrooms in the buildings. When implemented as part of a security strategy, measures specific to each of these parts of schools can enhance the overall security posture of a school. When designing a physical security plan, schools should keep in mind certain principles, such as respecting the school's primary mission, incorporating a layered approach to security and access control – limited entry points.

By applying the principles of Crime Prevention Through Environmental Design, schools can implement security measures such as fencing, bollards, planters, curbs, or walls to create a single point of entry to the campus, for both vehicles and pedestrians. This allows school staff to more effectively monitor every individual who comes onto the campus.

Access Controls—Video Surveillance: Video surveillance is a valuable security measure for entry control. Surveillance cameras can also be used beyond entry points to monitor areas that are not within the normal view of teachers, administrators, or security personnel, such as hallways and enclosed stairwells. When feasible, school security personnel or other staff should actively monitor video feeds, and the local first responder community should have access to them. Schools sharing video feeds with local law enforcement or others should ensure they are complying with all appropriate privacy laws, such as the Family Educational Rights and Privacy Act (FERPA), when doing so.

Access Controls—Screening Systems: Some schools may also wish to use screening systems to limit who and what can enter a building. These systems typically require one-at-a-time entry to check the person and belongings. Such systems can use metal detection, X-ray, explosives detection devices, or a physical search. The purpose of screening is to prevent illegal or prohibited items from entering any given facility, and there is evidence that supports the efficacy of screening as a method to detect, deter, or deny violent actors. However, these screening systems are labor-intensive, time consuming, and costly. The cost of a retrofit of a school or the time it takes to admit students into the building in accordance with screening procedures may be impediments to implementation. The impact of metal detectors, X-ray machines, and similar screening technologies on school violence is questionable, with at least one study concluding that metal detectors have no apparent effect on reducing violence on school grounds.

Building Envelope: The exterior face of school buildings, including the walls, roof, windows, and doors, comprise the building envelope. Much like in a classroom, these structural components can serve as a significant layer of defense from an incident or natural disaster. In particular, construction materials for doors and windows influence the effectiveness of these features in deterring, delaying, or denying active-shooter attacks. Doors constructed primarily with wood and non-reinforced glass windows offer a lower degree of protection than doors made from steel with blast or bullet-resistant glass windows. Replacing wood framed doors with fire-rated steel or aluminum can improve the level of protection offered. Replacing any non-reinforced glass windows with tempered, wire-reinforced, laminated, or bulletproof glass and applying blast-resistant safety films can strengthen windows to increase the protection they provide. Securing exterior windows so that individuals cannot use them to access a building can also improve the overall security of the building. In addition, clearing the exterior spaces surrounding school buildings of unnecessary foliage or structures may also eliminate spaces that could conceal illicit activity, provide access to the building above the first floor, or otherwise aid an intruder or attacker's efforts.

Classroom Doors, Locks, and Window Panels: Depending on their construction and configuration, classroom doors can significantly delay or prevent an attacker from reaching individuals within a classroom, thereby providing a safe area for students and staff during a lockdown. Much like the building envelope, the material from which doors are made will greatly affect their protective value. Reinforcing existing doors or replacing them with bulletproof doors can be very costly, but is an investment that some schools and school districts are making.

Regardless of the type of door used, all classrooms should have locks that allow the teacher to lock the classroom door from the inside. Locksets installed on classroom doors should have the ability to be opened from outside the classroom using a key, code, credential, or other method of deactivation. This enables teachers, administrators, and first responders to access the classroom, but not an attacker or intruder. When deciding on a locking device school officials must be aware of, and comply with, fire codes, life safety codes, and Americans with Disabilities Act (ADA) requirements.³⁸ In addition to the physical locking hardware, training and continued reinforcement of their use is important to get the full benefits of locks. Entry control technologies such as locks can be (and have been) rendered useless by individuals not adhering to proper security processes, such as by propping open doors for convenience or other reasons.

Many school doors have windows that allow someone outside the door to observe the inside of the classroom. These windows should be protected or reinforced and have a removable covering that can be quickly applied that obscures visual observation from both sides. Additionally, windows often are located on the door in a position where an attacker could smash the window to gain access to the door's locking mechanism. Schools can address this by installing reinforcing film that strengthens the glass or using doors designed in a way that a breach of the window will not provide the attacker the ability to access the locking mechanism and unlock the door.

Other measures can be taken to keep students and staff beyond the line of sight and line of fire of an attacker seeking to cause harm through the door window. One school district in southern Ohio has installed hurricane-type screening on door windows in its schools. These retractable screening devices prevent an outside observer from seeing into a room as they allow observation in a straight line only, thereby narrowing the field of view from outside of the classroom. Another approach some schools use is to place tape on the floor of the classroom designating areas of the classroom that cannot be seen through the door window. Students are trained to congregate in those designated areas during lockdowns.

Door Numbering Systems: School buildings come in all shapes and sizes with many entrances and exits. To help first responders gain access to an incident scene in the most efficient manner, schools can collaborate with local first responders to apply a common numbering system to the walls, doors (interior, exterior, and non-access), roof hatches, and stairwells. At present, 20 states provide recommendations and resources to schools about this practice via their Statewide School Safety Centers.

Hallways, Stairwells, Utility Rooms, and Other Areas: Each building will have certain areas that are more difficult than others to monitor, such as hallways, stairwells, and utility rooms. Although data about the location of school violence within a school is limited, there is some indication that students feel the least safe in areas with minimal adult oversight and that violence is most prevalent in areas like hallways and stairways that are least monitored. Similarly, spaces behind ceiling panels or walls can be easily accessed but prove difficult to monitor and can serve as staging areas for contraband or hiding places for intruders. Developing or installing systems to monitor these spaces by either physical inspection or surveillance cameras may be necessary to mitigate their use for nefarious purposes. Eliminating non-structural elements of ceilings and walls such as removable panels may help to serve the same purpose.

Portable Classrooms: Portable buildings that are used for classrooms can present unique challenges because they frequently do not have the same construction features as the primary buildings, resulting in windows and doors with lower levels of security. They might also be located in less secured areas that provide easier access to an attacker. If a school has portable buildings (and eliminating their use is not practical), additional security measures may be warranted, including increased monitoring, assigned security personnel, retrofitting doors and locks, or ballistic protection on the windows.

Recommendations:

States and Local Communities

- Schools or school districts should establish a security management team with a designated lead official to oversee security efforts. States and localities should consider supporting these efforts by providing dedicated funding for security management teams. States and localities should also consider requiring school districts or the individual schools within their jurisdiction to establish security management teams. Once established, these teams should work to develop a school security community of interest by engaging the school's teachers, administrators, counselors, and other staff, parents and students, and external partners like local first responders, social workers, and elected officials.
- Schools should conduct a risk assessment or have a risk assessment performed in order to identify existing vulnerabilities and support the development of a strategy to address security gaps. To do this, schools could use the security self-assessment that DHS released along with its K–12 School Security: A Guide for Preventing and Protecting against Gun Violence or another assessment methodology (or they could work with a third party to conduct the assessment for them). States and localities should consider supporting these efforts by providing dedicated funding for the performing of school risk assessments. They can also consider requiring individual schools within their jurisdiction to complete risk assessments.
- Following the completion of a risk or vulnerability assessment to determine what risks and security gaps exist in the school's current building security program,

schools should take steps to address those gaps. In doing so, they should design security measures in a way that achieves security goals without requiring sacrifices to the school's primary educational and developmental missions. Every school is different, and, therefore, the protective measures in place will vary based on the characteristics of the site, location, resources, and personnel available. Schools should make sure to take into account their unique physical characteristics when designing a security plan. School security plans should use a layered approach across all three areas of a school (i.e., the entry points, the building envelope, and the classroom) with measures designed to complement and support each other. Schools also should consider the special needs of the student population and other individuals who access the school to ensure security measures, emergency notifications, and response plans are effective and account for all.

F. Training & Drills

1. Training School Personnel to Help Ensure Student Safety

All school personnel play an important role in school safety. Training on safety matters helps prepare them to respond to incidents of school violence. The school personnel best positioned to respond to acts of violence are those with specialized training such as school resource officers (SRO), who are typically sworn law enforcement officers, and school safety officers (SSO), who are typically unsworn school security staff. These officers have been specifically trained in school safety to act as a first-line of defense. Their presence at school facilities and on campus allows them to build the kinds of relationships with students that can prevent or mitigate incidents of school violence.

A review of state-mandated emergency drills and training related to school safety identified 43 states that required schools to conduct safety training for teachers or other school staff. Some 21 of the 43 required training on emergency operations plans or emergency response procedures, and 14 of them required training related to mental health or violence prevention.

In 2016 some 57 percent of public schools reported the presence (at least once a week) of security staff. That number, while an increase over prior years, leaves almost half of America's public schools without any regular school security staff presence. There are a wide variety of reasons for the decision not to have regular designated school security staff on site, ranging from funding to remoteness of locale. Ten states have sought to address this situation by allowing school staff to possess or have access to firearms at school. No state mandates arming school staff. Several hundred school districts provide school staff access to firearms, usually as part of a layered approach to school security. All of these programs require a mandatory minimum level of training.

Recommendations:

States and Local Communities

- A. States, districts, and local schools should develop a comprehensive school safety plan that includes a requirement for school safety training for all school personnel. When developing training for all school personnel, states and local communities should consider the following:
- Use specialized school personnel who are trained to prevent, recognize, and respond to threats of violence;
 - Review the quality and quantity of training for all school staff, especially specialized school personnel and others who may carry weapons;
 - Ensure that school administrators are trained on the proper role of SROs and SSOs, including how to work collaboratively with them;
 - Clarify the roles and responsibilities of specialized school personnel such as SROs and SSOs through MOUs;

- Clarify the parameters of information sharing between school staff, SROs, and SSOs, with special consideration and training regarding the privacy requirements of the Family Educational Rights and Privacy Act (FERPA) and the Health Insurance Portability and Accountability Act (HIPAA); and
 - Determine, based on the unique circumstances of each school (such as anticipated law enforcement response times), whether or not it is appropriate for specialized staff and non-specialized staff to be armed for the sake of effectively and immediately responding to violence. This can be particularly helpful in districts where the distances involved can make police response times longer.
- B. States and local communities, in concert with law enforcement, should consider various approaches to school safety based on their own unique needs. School districts may consider arming some specially selected and trained school personnel (including but not limited to SROs and SSOs) as a deterrent. Before deciding on the voluntary arming of school personnel, states, districts, and schools should carefully consider the following:
- Existing security measures What types of security measures already exist to ensure student safety? Is there a full-time SRO already present in case of emergency?
 - Proximity of police How quickly can local police arrive in the event of an active shooter? How well do local police know the school (e.g., layout of the school, area around the school) in order to coordinate an effective response?
 - Acceptance of the school community Are school community stakeholders comfortable with arming school personnel? Are there staff members willing to voluntarily participate in such a program, particularly those with prior law enforcement or military training?
 - Preparedness What would initial and ongoing background checks and screening requirements entail? What initial and ongoing robust training requirements would be in place? How would firearms be properly secured yet made easily accessible when necessary?
 - Local policy and state law - Does local policy and state law allow for the arming of school personnel? What infrastructure and resources exist for the creation of such a program? What potential liabilities exist for such a program (e.g., ability to maintain insurance coverage)?

2. Emergency and Crisis Training for Law Enforcement

Recommendations:

States and Local Communities

A. State and local law enforcement should take advantage of these resources to assist them in preventing, planning for, and responding to school shooting incidents. They are also encouraged to suggest areas in which additional resources might be useful.

- Justice Assistance Grant
- National Training and Technical Assistance Center
- Identifying an Armed Person Training
- VALOR Officer Safety and Wellness Training and Technical Assistance Program
- Preparing for Active Shooter Situations (PASS) Training Program
- School Violence Prevention Program (SVPP)
- Behavioral Analysis Unit (BAU) Active Shooter Reports
- Active Shooter Incident Reports
- Crisis Communications Quick Reference Guide
- Behavioral Threat Assessment Center

G. SRO/Safety Coordinator Programs

1. General Observations on School Resource Officer Programs

Research and presentations to the Commission from subject matter experts highlight the importance of defining the roles and responsibilities of all school staff, including SROs. One way to do so is through a Memorandum of Understanding (MOU) between schools and law enforcement agencies. These MOUs should include a discussion of key areas such as training expectations, duties and responsibilities, funding, information sharing, and student discipline.

Recommendations:

State and Local Communities

- States, districts, and local schools should develop a comprehensive school safety plan that includes a requirement for school safety training for all school personnel. When developing training for all school personnel, states and local communities should consider the following:
 - Use specialized school personnel who are trained to prevent, recognize, and respond to threats of violence;
 - Review the quality and quantity of training for all school staff, especially specialized school personnel and others who may carry weapons;
 - Ensure that school administrators are trained on the proper role of SROs and SSOs, including how to work collaboratively with them;
 - Clarify the roles and responsibilities of specialized school personnel such as SROs and SSOs through MOUs;
 - Clarify the parameters of information sharing between school staff, SROs, and SSOs, with special consideration and training regarding the privacy requirements of the Family Educational Rights and Privacy Act (FERPA) and the Health Insurance Portability and Accountability Act (HIPAA); and
 - Determine, based on the unique circumstances of each school (such as anticipated law enforcement response times), whether or not it is appropriate for specialized staff and non-specialized staff to be armed for the sake of effectively and immediately responding to violence. This can
 - be particularly helpful in districts where the distances involved can make police response times longer.
 - States and local communities, in concert with law enforcement, should consider various approaches to school safety based on their own unique needs. School districts may consider arming some specially selected and trained school personnel (including but not limited to SROs and SSOs) as a deterrent. Before deciding on the voluntary arming of school personnel, states, districts, and schools should carefully consider the following:
 - a) Existing security measures

- What types of security measures already exist to ensure student safety? Is there a full-time SRO already present in case of emergency?
Proximity of police
- How quickly can local police arrive in the event of an active shooter?
- How well do local police know the school (e.g., layout of the school, area around the school) in order to coordinate an effective response?
Acceptance of the school community
- Are school community stakeholders comfortable with arming school personnel?
- Are there staff members willing to voluntarily participate in such a program, particularly those with prior law enforcement or military training?

b) Preparedness

- What would initial and ongoing background checks and screening requirements entail?
- What initial and ongoing robust training requirements would be in place?
- How would firearms be properly secured yet made easily accessible when necessary?

c) Local policy and state law

- Does local policy and state law allow for the arming of school personnel?
- What infrastructure and resources exist for the creation of such a program?
- What potential liabilities exist for such a program (e.g., ability to maintain insurance coverage)?

(See also focus area “Other – 2.The Transition of Military Veterans and Retired Law Enforcement Officers into New Careers in Education”)

H. Access to Grants and Funding Opportunities for School Safety

The issue of grants and funding opportunities was not examined by the White House Federal Commission on School Safety.

I. Legal – Statutory Constraints on School Safety

1. The Family Educational Rights and Privacy Act (FERPA) and Other Statutory and Regulatory Privacy Protections

Educators, parents, law enforcement officers, and others are often unclear about FERPA's specific requirements and exceptions, and some take advantage of the confusion surrounding FERPA.

Following the Virginia Tech shooting, the George W. Bush Administration recommended that school policies articulate what types of student information can be shared, with whom it can be shared, and under what conditions it can be shared. Based on those recommendations, the Department of Education amended FERPA regulations to clarify permissible disclosures of student records and PII contained therein in health or safety emergency situations.

Prior to the amendments, schools and districts were more limited in what they could non-consensually disclose in the context of a health or safety emergency. In 2008, citing the need for "greater flexibility and deference" and "so they [schools administrators] can bring appropriate resources to bear on a circumstance that threatens the health or safety of individuals," the Department removed the strict construction requirement. With the rule change, the Department affirmed that it would review determinations to disclose education records under FERPA's health or safety exception by assessing whether:

- There was an "articulable and significant threat to the health or safety of the student or other individuals;"
- The disclosure was made to appropriate parties; and
- There was a rational basis for the determination. The Department also stated that, assuming the foregoing was satisfied, it would "not substitute its judgment for that of the educational agency or institution in evaluating the circumstances and making its determination."

After these regulatory changes, the Departments of Education and Health and Human Services issued Joint Guidance on the Application of FERPA and the Health Insurance Portability and Accountability Act (HIPAA). This guidance sought to explain the relationship between the two laws and address apparent confusion on the part of school administrators, healthcare professionals, and others as to how they apply to student records and the ability to communicate information.

Though these recommendations and actions sought to clarify FERPA, substantial misunderstanding remains at the local level among officials and educators concerning the privacy law, and in particular its application to school-based threats.

A misconception in both the education and law enforcement communities is that FERPA poses an impediment to the sharing of student information that could help prevent school violence and other emergencies. Privacy advocates have correctly noted that

FERPA already permits schools to disclose the information necessary to protect students and other individuals before and during emergencies, but that continued confusion over the scope of FERPA remains.

Contrary to common misconceptions, schools have a great deal of flexibility under FERPA to disclose students' education records, or the PII contained therein, in the context of school safety. These five exceptions to FERPA's general requirement for written consent are especially relevant:

- disclosures to other school officials
- disclosures pursuant to a court order or lawfully issued subpoena
- disclosures in connection with a health or safety emergency
- disclosures (pursuant to state law) relating to juvenile justice and
- disclosures to the parents of an eligible student that is claimed by the parents as a dependent for federal tax purposes.

Especially relevant to potential violence at school is FERPA's health or safety emergency exception which permits the disclosure of students' education records, or the PII contained therein, to appropriate parties if knowledge of such information is necessary to protect the health or safety of students or other persons in connection with an emergency.

FERPA's health or safety emergency exception specifically permits schools or districts themselves to disclose PII from students' education records in the context of emergencies. However, there are certain circumstances when it may not be practical or expedient for schools or districts themselves to make the determinations and disclosures necessary to address the emergency. These situations might include natural disasters that impact multiple districts across the state, emergencies that disrupt a district's data systems, or emergencies that occur when district personnel are not available. In these limited situations, it is often advantageous for the state education agency to make the disclosure directly, on the school's or district's behalf.

Police departments often seek access to school surveillance footage to help ensure school safety—only to have schools claim it is an education record protected by FERPA and therefore deny the request. However, FERPA's definition of "education records" excludes those created and maintained by a school's law enforcement unit for a law enforcement purpose. If a school's security department or campus police maintains the school's surveillance video system and, as a result, creates surveillance footage for a law enforcement purpose, FERPA would not prevent sharing the surveillance footage with local law enforcement. Smaller schools without an existing law enforcement unit or security department can still utilize this exclusion by designating a school official, such as the vice-principal, as the school's law enforcement unit for this purpose.

Another exception to FERPA's written consent requirement allows disclosures to school officials who have been determined to have a legitimate educational interest in the education records, such as needing to review the education records in order to fulfill

their professional responsibilities. Schools and districts specify the criteria for determining both who they consider school officials and what constitutes a legitimate educational interest. Under this exception, schools can disclose education records, or the PII contained therein, that are relevant to school safety to individuals designated as school officials and determined to have a legitimate educational interest, including teachers and school resource officers.

Recommendations:

States and Local Communities

- States should examine their state-level student privacy laws to identify protections that go beyond FERPA and may impede schools' and districts' efforts to promote school safety and student well-being. FERPA is not the only student privacy law that can hinder the appropriate sharing of student information in the context of emergency situations. Schools and districts may find that information that could be shared under FERPA may not be shareable under their state student privacy laws.
- Districts and schools should raise awareness of existing FERPA flexibilities and utilize existing (and forthcoming) trainings through the U.S. Department of Education's Privacy Technical Assistance Center (PTAC). District and school staff can also make recommendations on additional training needs that can support increased awareness and understanding of FERPA requirements by emailing privacyTA@ed.gov. The following are some of the existing PTAC resources:
 1. In 2018, ED published a series of Frequently Asked Questions that clarified FERPA's applicability to photos and video recordings of students, with specific applicability to surveillance videos.
 2. ED has responded to requests from states, school districts, postsecondary institutions, law enforcement agencies, and others for technical assistance on FERPA's requirements and general privacy best practices in the context of school safety.
 3. ED's June 2010 guidance "Family Educational Rights and Privacy Act (FERPA) and the Disclosure of Student Information Related to Emergencies and Disasters," and June 2011 guidance "Addressing Emergencies on Campus," provide detailed explanations of the various exceptions to consent under FERPA that may apply in different safety scenarios.

2. The Health Insurance Portability and Accountability Act (HIPAA) and Other Statutory and Regulatory Privacy Protections

The HIPAA Privacy Rule regulates the sharing of individually identifiable health information known as “protected health information” (PHI).

Mental health and substance use information is highly relevant in the school safety context. The HIPAA Privacy Rule applies to PHI, including mental health information such as substance use disorder (SUD) diagnosis and treatment information. In addition to HIPAA, much substance use disorder diagnosis and treatment information is protected by 42 CFR (Code of Federal Regulations) Part 2, which is regulated by the U.S. Department of Health and Human Services (HHS) Substance Abuse and Mental Health Services Administration (SAMHSA). 42 CFR Part 2 is discussed later in this report.

The HIPAA Privacy Rule establishes a floor of federal privacy protection for PHI held by covered entities and their business associates. However, it does not preempt or replace other federal or state laws that may offer greater privacy protection. Many states or other jurisdictions impose stricter privacy protections than HIPAA, particularly for information considered especially sensitive, such as information related to mental disorder and SUDs. Privacy protections for individuals’ health information are not uniform across the nation, and this is a source of confusion for healthcare entities.

Congress recently considered whether HIPAA interferes with effective communication and treatment for people with serious mental illnesses. It concluded that there is confusion in the healthcare community regarding circumstances under which information can be released under HIPAA. This confusion often hinders communication of information with appropriate caregivers that would support safe and coordinated treatment.

The HIPAA Privacy Rule does not require a covered entity to disclose PHI in its possession. The Privacy Rule permits a covered entity to disclose an individual’s PHI pursuant to his or her authorization or under circumstances and for purposes expressly described in the Privacy Rule.

Covered entities are permitted to share PHI in several circumstances that are relevant to the school safety context. This includes sharing information with law enforcement, public health authorities, parents and other caregivers, and persons in a position to help prevent a serious and imminent harm to health or safety.

For example, providers are permitted to make such disclosures when required by state or federal law or in response to an administrative subpoena or other civil legal process. Providers may also disclose limited information to help identify or locate a suspect, witness, or missing person; and about individuals who are suspected to be or who are victims of crime. In general, school employees are not providers under HIPAA. However, there may be certain situations where a school employee (such as a nurse or counselor) is a health provider, and in that case HIPAA may apply.

Covered entities may disclose PHI to public health authorities for public health activities (45 CFR 164.512(b)), which could include violence prevention initiatives or state law requirements to report child abuse or neglect.

The Privacy Rule generally treats parents as “personal representatives” of their minor children. Personal representatives generally have the authority to act on behalf of the minor child when providing consent to share information under HIPAA. Providers can decide not to treat a parent as a personal representative if, for example, they have concerns that doing so might put the child’s safety at risk.

The HIPAA Privacy Rule also permits healthcare providers and other covered entities to share PHI with persons involved in the care or payment for care of individuals who are not able to agree or object to the disclosure (e.g., due to a mental health crisis). This is based on the entity’s judgment that sharing PHI is in the best interests of the patient. Under these circumstances, the recipients of the information may include family members, such as parents of children who are no longer minors.

Providers and other covered entities may disclose patient PHI to avert a serious and imminent threat to the health or safety of the patient or others when they have a good faith belief that such a disclosure is necessary to prevent or lessen the threat. Under these circumstances, providers may alert those persons they believe are reasonably able to prevent or lessen the threat. This includes law enforcement, school officials, teachers, parents, friends, school counselors, or anyone reasonably able to help avert the harm. The disclosure must be made in good faith and be consistent with applicable law and standards of ethical conduct.

With respect to records held by schools, HIPAA excludes individually identifiable information in “education records” covered by the Family Educational Rights and Privacy Act (FERPA) and certain “treatment records” of eligible students from the definition of PHI. In most cases, therefore, records created by a school nurse or other school health professional (including those that are HIPAA-covered entities) are not subject to the HIPAA Privacy Rule.

When HIPAA does apply in school settings and for PHI related to minor children, HHS Office for Civil Rights (OCR) guidance and resource materials help clarify the circumstances when providers may disclose information to parents.

Confidentiality of substance use disorder patient records

The Part 2 regulations apply to any federally assisted program that identifies itself as a substance use disorder (SUD) program providing treatment services. The regulations require that treatment records identifying a patient as having or having had a SUD be confidential and only disclosed under expressly authorized circumstances.¹⁶ In general, a SUD treatment program that is subject to Part 2 must obtain written patient consent before disclosing patient-identifying information. Once this information is disclosed, re-disclosure is not permitted unless expressly permitted by the written consent of the

patient or unless otherwise permitted under Part 2. Certain exceptions to the written consent requirement are permitted under Part 2, such as disclosures for research, medical emergency, and audit and evaluation purposes.

Recommendations

States and Local Communities

- State and local healthcare providers should ask patients to identify any family members or other helpers or caregivers involved in their care before an emergency occurs so the providers know not only who to notify in an emergency situation, but also who to call about their care.
- To prepare for potential emergency circumstances, schools, healthcare providers, and others affected by the HIPAA Privacy Rule should familiarize themselves with the OCR guidance described above (as well as other applicable law and professional ethical standards) before an emergency occurs.

J. Cyber Security & Risk

The White House Federal Commission on School Safety did not examine or offer any recommendations for states and local communities related to cyber security and risk.

K. Other

1. Active Shooter Preparedness and Mitigation

Recommendations:

States and Local Communities:

Reports prepared in the aftermath of school shootings have universally recognized the value of preparing for a potential active shooter incident and other mass casualty events through training, planning, and related strategies.

The unique characteristics of K–12 school environments, including campus layout and building design, present complex challenges to active shooter planning. Therefore, approaches to address active shooter incidents at schools must be specific to each school’s unique environment. Numerous factors should inform the design of a school’s active shooter preparedness program. They include the following.

- **Age:** Students in grades K–12 typically range in age from five to 19, presenting unique challenges for each age group. Elementary students, for example, are unable to understand and respond to an incident in the same manner as a high school student. Therefore, age is often an important consideration in how to discuss awareness campaigns and response methods with students. While the “Run, Hide, Fight” approach for reacting to active shooter incidents is widely taught nationwide, the “Fight” portion of the campaign may not be appropriate for all age groups and may require modification to ensure younger students better understand, respond, and react to an active shooter. Federal, state, and local governments as well as associations and nonprofits have developed approaches tailored for children to respond to active shooter incidents. Individual levels may vary due to the unique developmental, cultural, educational, and personal profiles within a community or classroom. School communities and parents, in partnership, should consider the individual psychological backgrounds and educational needs of students when determining awareness levels as well as appropriate education and training.
- **School Design:** A school’s design will have a great impact on how it prepares to prevent, protect, mitigate, respond to, and recover from active shooter incidents. Suburban schools often have campus-style environments with multiple buildings, while urban schools tend to consist of single multi-level buildings. Campus-style schools can be more difficult to secure, as the dispersed school buildings are exposed to attacks from multiple directions. A more compact organization of buildings or a single building provides for more streamlined surveillance and access control.¹⁵ The level of security in individual classrooms (e.g., strength of classroom doors and locks, presence or absence of windows with lines of sight)

may influence decisions on active shooter preparedness, as can the existence or absence of layers of security to delay potential attackers.

- **Student Background and Special Needs:** Students come from a variety of family, cultural, and medical disabilities and medical history backgrounds. This presents additional considerations for school safety and security. According to the most recent data provided by the National Center for Education Statistics, approximately 4.8 million public school students identify as English language learners, and 6.7 million students received special education services in 2015. Active shooter awareness and response communications, training, and planning should take language differences and disabilities into consideration to include the entire student population.
- **Laws and Policies:** Schools may need to follow different rules than businesses when implementing security policies. Schools are not only responsible for training and keeping students safe, but also for leading students in an emergency. State and local laws as well as school policies concerning security and response vary nationwide, and schools should be aware of the regulatory responsibilities imposed upon them in their jurisdictions.

Through its various engagements with school safety and security stakeholders, the Commission identified a variety of elements and approaches that experts routinely recommend schools incorporate when developing their active shooter preparedness and mitigation program. These include physically hardening the school, engaging in community planning, encouraging and facilitating the reporting of suspicious behavior, conducting training and exercises, maintaining and testing effective communications systems, and establishing threat assessment teams. Each of these key elements are summarized below.

- **School Hardening:** There are several core parts of a comprehensive active shooter preparedness strategy. They include security measures that help control access to the school and its campus, physically strengthen the building, and seek to create secure spaces within classrooms where students and teachers can shelter in the case of an active shooter. These measures can deter an attacker from initiating an attack, protect individuals during an attack, and delay the attacker to allow additional time for local law enforcement to respond.
- **Community Planning:** As of the 2015–2016 school year, 92.4 percent of public schools reported having written plans to address a shooting on campus. It is beneficial for schools to establish safety planning teams that include school administrators, teachers, parents, students, and other community partners. This approach ensures a multi-disciplinary, multi-perspective methodology that reflects the community's values, priorities, and unique needs, thereby increasing the chances of implementation success. Whole community planning should happen concurrently, and be coordinated, at the school district and individual school levels.
- **Identification and Reporting of Suspicious Behavior:** Physical protection measures only go so far when it comes to preventing an active shooter incident. Potential warning signs are not always the result of a direct threat—more often,

there is observable conduct that could signal a threat. Detecting and addressing concerning behavior, thoughts, or statements can prevent active shooter situations from occurring.

- Training and Exercises: It is widely agreed that a robust training and exercise program is essential to successfully addressing the complex active shooter threat. Law enforcement and school officials should train together to respond to emergencies.
 - a) Active shooter training for students should be age-appropriate and consist of prevention, situational awareness, and response training. School administrator and teacher training should include tabletop exercises (i.e., group exercises that do not involve hands-on practice or fieldwork, but rather are intended to generate discussion of issues surrounding a hypothetical, simulated emergency) with school safety and security teams. When possible and age-appropriate, response training for school administrators, teachers, and students should involve role-play, scenario-based training that simulates a real-life active shooter incident requiring quick decision-making. To the extent possible, all active shooter trainings, especially those related to responding to and recovering from an active shooter incident, should be trauma-informed.
 - b) In addition to active shooter training, it is important for school staff and students to be trained on and follow appropriate security protocols.
- Communication Systems and Protocols: The ability to communicate quickly and effectively often is central to a successful response to an active shooter incident. This includes the ability of school staff or students to quickly inform law enforcement of an active shooter situation, thus initiating the law enforcement response; the ability to quickly alert staff, students, and other members of the community of an ongoing active shooter situation in order to initiate a lock down, evacuation, or other appropriate action; and the ability for law enforcement to communicate among themselves and with the school as necessary during a response. Unfortunately, there are “communication-related problems that impede law enforcement during all tragedies, including [the Parkland school shooting].” These may include outdated or insufficient communications equipment (e.g., radios or phones that do not receive signals inside school buildings), lack of training on existing communications equipment or protocols, and a lack of interoperability between the communications equipment possessed by first responder organizations and the school.
 - In regards to notifying law enforcement of an active shooter, Sheriff Tim Troyer told the Commission that calls to 911 typically occur two to three minutes after the start of an attack. As was the case in Parkland, 911 calls are often indirect calls (e.g., made by parents of students who had called their parents rather than law enforcement).²⁸ In order to reduce this delay in notification, Troyer recommended that schools implement mechanically simple means of notification that contact the 911 center directly. One school accomplishes this by having teachers wear an emergency fob

around their neck that they can press in the event of an active shooter incident, immediately triggering a school-wide alarm and notifying law enforcement.

- Schools should consider establishing, maintaining, testing, and training on communication technology and protocols (e.g., emergency alerts, mass notifications, intercom announcements) that can alert both staff and students, as well as parents and the broader local community, of an active shooter situation. Within schools, it is best if alerts are both audible and visual, and can be seen and heard throughout the entire school grounds.
- Finally, schools should consider working with local law enforcement to test, drill, and exercise the communications equipment first responders will be using during a response to ensure its adequacy. Often, the hardened physical construction of school buildings can make radio or phone communication within the school buildings difficult. Communications equipment that does not properly function within the school will be of extremely limited value during a response. Additionally, interoperability of communications equipment, which was a problem during the 9/11 attacks, remains a problem today. For instance, during the response to the Parkland shooting, a lack of interoperable equipment forced law enforcement to resort to hand signals. States and localities can take action to help address these concerns.
- Threat Assessments: Numerous witnesses stressed to the Commission the importance of schools establishing threat assessment teams. Threat assessment teams are most effective if they are multi-disciplinary and include a diverse group of stakeholders, such as school counselors, school resource officers, teachers, and school administrators. Parents and students are not typically part of the threat assessment team, as personal and confidential information about a student is often discussed.

Active shooter preparedness training, exercises, and workshops

Training for active school shooter scenarios should be designed with the audience receiving the training in mind, whether they are students, teachers and school administrators, or law enforcement officers.

Students: While there is some disagreement over whether it is appropriate to subject students to active shooter training, as school shootings become more prevalent, more schools are opting to drill their students on how to respond to an active shooter situation. According to a 2016 U.S. Government Accountability Office report, an estimated 67 percent of school districts conduct active shooter drills involving their students. Whether or not to conduct active shooter drills with the student population is something each community must determine for itself. For those that do elect to conduct active shooter drills with students, they should ensure that the training is age-appropriate and designed in a manner not to unduly traumatize any of the participants.

Staff: All schools should consider providing active shooter training to teachers and other on-site personnel. The most effective way to train staff to respond to an active shooter situation is to conduct mock active shooter training exercises. Local law enforcement is an excellent resource in designing training exercises. Training should include discussions on recognizing the sound of gunshots, the “Run, Hide, Fight” or similar approach used in the school, calling 911, reacting when law enforcement arrives, and adopting a survival mindset during times of crisis.

Some school districts have developed videos to supplement training for school staff. Videos can also reinforce other school safety practices.

Both the U.S. Department of Homeland Security Federal Emergency Management Agency’s (FEMA) Emergency Management Institute and the U.S. Department of Education’s Readiness and Emergency Management for Schools (REMS) Technical Assistance Center provide a variety of training programs for school staff and other members of the school community on how to prepare for emergencies at schools. They include “Preparing for Emergencies—What School Staff Need to Know,” “Multi-Hazard Emergency Planning for Schools,” “Developing Emergency Operations Plans K–12 101,” and “Preparing for Mass Casualty Incidents: A Guide for Schools, Higher Education, and Houses of Worship.” Most of these courses provide instruction applicable to both natural and human-caused events, including active shooter situations.

Law Enforcement Officers: Both the U.S. Department of Homeland Security and the U.S. Department of Justice manage numerous programs to help train federal, state, local, and tribal law enforcement officers for active shooter situations. They include the Department of Homeland Security’s Federal Law Enforcement Training Centers (FLETC) Active Threat and Tactical Medical Training, FEMA Emergency Planning for Schools, the Department of Justice’s Office of Community Oriented Policing Services (COPS) Preparing for Active Shooter Situations (PASS) Training Program, the Federal Bureau of Investigation’s Active Shooter: Managing the Mass Casualty Threat DVD, the Federal Bureau of Investigation’s Crisis Communications Quick Reference Guide and the Federal Bureau of Investigation’s Initial On Scene Command Considerations.

Tactical Emergency Casualty Care/Mass Casualty Response Training: In active shooter situations, providing rapid medical care to the injured is critical. If students and personnel are seriously injured and do not receive aid in a timely manner, they may die before first responders are even able to enter the building. However, if the students and staff around them can provide appropriate first aid, they may buy the injured time. The Tactical Emergency Casualty Care (TECC) framework outlines how best to do this. There are three components to a successful First Care Provider program: policy, training, and equipment.

A number of resources are available to help school districts or individual schools design TECC training programs. They include Tactical Emergency Casualty Care Guidelines

for First Care Providers, You Are the Help Until Help Arrives, Introduction to Tactical Emergency Casualty Care and Stop the Bleed.

Exercises and workshops

Exercises and workshops help evaluate the success of training, maintain optimal levels of performance, and test and evaluate plans. A well-designed exercise provides a low-risk environment to test capabilities, familiarize personnel with roles and responsibilities, and foster meaningful interaction and communication across organizations. Workshops are a type of discussion-based exercise focused on increased participant interaction and focusing on achieving or building a product, such as a report or best practices documentation. Both formats can enhance the security of schools and safety of students across the nation by empowering states and school districts to put their emergency plans.

One of the most commonly used approaches to evaluate active shooter preparedness is through tabletop exercises (TTXs). TTXs are table-based activities typically held in an informal setting and presented by a facilitator. They do not involve hands-on practice or fieldwork, but rather are intended to generate discussion of various issues regarding a hypothetical, simulated emergency. TTXs can be used to enhance general awareness, validate plans and procedures, rehearse concepts, and/or assess the types of systems needed to guide the prevention of, protection from, mitigation of, response to, and recovery from a defined incident. Delivered in a low-stress environment, the TTX offers participants the opportunity to explore different ideas in the context of a real-world scenario.

When designing TTXs, other exercises, or workshops to evaluate active shooter preparedness, designers should consider following the Homeland Security Exercise and Evaluation Program (HSEEP) approach. HSEEP provides a set of guiding principles for exercise programs, as well as a common approach to exercise program management, design and development, conduct, evaluation, and improvement planning. Principles include using capability-based and objective-driven exercises informed by risk, engaging the whole community, and designing a progressive program with an increasing level of complexity over time. These can help a school or school district develop an effective exercise program. HSEEP also calls for the documentation of strengths, areas for improvement, core capability performance, and corrective actions in an After-Action Report or Improvement Plan. Through improvement planning, organizations take the corrective actions needed to improve plans, build and sustain capabilities, and maintain readiness.

DHS offers a variety of exercises and workshops to assist schools, local law enforcement, and others prepare for active shooter situations. They include Active Shooter: What You Can Do; Campus Resilience Program Tabletop Exercises; and DHS Active Shooter Preparedness Workshop.

Recommendations:

States and Local Communities

- States should consider requiring or providing funding for all school districts and individual schools to develop and (on no less than an annual basis) provide training and exercises on comprehensive active shooter preparedness programs.
- Teacher preparedness is critical to school security, especially in cases of an active shooter. As every state requires teachers to meet certain requirements for certification to teach in their state, it is recommended that states and school districts consider requiring basic school security and/or active shooter preparedness training as part of their state’s teacher certification requirements.
- All schools should conduct active shooter training and exercises for staff on a recurring basis as well as age-appropriate active shooter training for students. Exercises might include evaluations that assess the participant’s ability to meet exercise objectives and capabilities, and document strengths, areas for improvement, core capability performance, and corrective actions in an After-Action Report or Improvement Plan. Following the exercise, organizations should develop a plan to implement the corrective actions identified during the exercise to improve plans, build and sustain capabilities, and maintain readiness.
- Providing TECC training to school staff and maintaining appropriate, rapidly accessible medical equipment within schools is a proactive means of reducing loss of life in active shooter scenarios and other potential mass casualty incidents. School systems should provide TECC training to school staff or provide funding for school staff to complete TECC training. Schools should review existing medical equipment within the school and, to the extent possible under existing school budget conditions, maintain appropriate medical equipment consistent with the TECC training.
- Effective communication systems and rapid dissemination of information can save lives during an incident or event. Schools should establish and maintain effective communications systems (e.g., one-way intercoms or two-way radios) to rapidly provide alerts, warnings, or other key information during an incident. Schools should test their communications equipment and methods during training and exercises. States and localities should also undertake efforts to ensure interoperability of local law enforcement and school communications equipment.

2. The Transition of Military Veterans and Retired Law Enforcement Officers into New Careers in Education

Military veterans and retired law enforcement officers often have the leadership, experience in high-stress environments, and essential training to help ensure the safety and security of our nation’s schools. Many will also possess pedagogical skills—classroom management and real-world experience training others—that can make for highly effective educators. Former service members and police officers stepping into

roles as principals, administrators, teachers, counselors, school resource officers (SROs), and other school-related positions could help foster safety in our schools.

Recommendations:

States and Local Communities:

- States and districts should consider offering incentives and additional resources to recruit veterans and law enforcement officers into careers in education. Policies, programs, and incentives could include:
 - Instituting fast-track application reviews for veteran and law enforcement applicants
 - Collecting and using data on veterans and law enforcement officers, including number of applications, hiring, and retention;
 - Adding preference points to a job candidate's score for relevant military and law enforcement experience;
 - Employing a dedicated hiring officer to recruit and hire veterans and law enforcement officers; and
 - Participating in the U.S. Department of Veteran Affairs GI Bill On-The-Job training and apprenticeship program as a way to attract veteran candidates to school employment positions.
- States should reduce barriers to certification and incorporate appropriate incentives and programs that help veterans and law enforcement officers enter new careers in education. Policies, programs, and incentives could include:
 - Encouraging districts to provide compensation structures that include salary credit for prior military and law enforcement experience;
 - Providing districts with financial incentives to hire significant numbers of veterans and law enforcement officers;
 - Changing state legislation and policies that prevent local agencies from re-hiring certified law enforcement officers because of pension penalties;
 - Establishing a dedicated military veteran and/or retired law enforcement liaison position;
 - Applying for TTT grants and/or establishing a state center designed to conduct outreach and certification support to veterans and law enforcement officers; and
 - Partnering with Department of Defense programs such as Skillbridge and the Army's Career Skills Program.