School Safety and Threat Assessment Policy

North Carolina law recognizes that "all schools should be safe, secure, and orderly. If students are to aim for academic excellence, it is imperative that there is a climate of respect in every school and that every school is free of disruption, drugs, violence, and weapons." This policy addresses various means to foster school safety set forth in G.S. 115C, Article 8C, Part 2 (G.S. 115C-105.49 *et seq*.)

1. School Safety Exercises.

At least once a year, the school will hold a school-wide tabletop exercise and drill based on the procedures documented in the School's confidential School Risk Management Plan (SRMP) and shall report the date and time the drill is conducted to the Center for Safer Schools. The drill shall include a practice school lockdown due to an intruder on school grounds. The school will hold a tabletop exercise and drill for multiple hazards in its SRMP. The School will seek to include local law enforcement and emergency management agencies in its tabletop exercises and drills. The purpose of the tabletop exercises and drills shall be to permit participants to (i) discuss simulated emergencies in a low-stress environment, (ii) clarify their roles and responsibilities and the overall logistics of dealing with an emergency, and (iii) identify areas in which the SRMP needs to be modified.

A tabletop exercise involves key personnel conducting simulated scenarios related to emergency planning. A drill is a school-wide practice exercise in which simulated scenarios related to emergency planning are conducted.

2. Threat Assessment

A. Introduction. The school shall provide for assessment and intervention by threat assessment teams, including a classification system to indicate various levels of threats and the standard response to each threat level. It also distinguishes between *assessment* and *intervention* at each school level, as appropriate. In developing these policies, the School has consulted the guidance issued by the North Carolina Center for Safer Schools and the school's threat assessment team. These policies shall not reference or reveal any information that is otherwise confidential safety information. A copy of this policy shall also be sent to the Center for Safer Schools.

The National Threat Assessment Center (NTAC) of the U.S. Secret Service has identified eight critical steps to dealing with school safety threats[1]:

1. Establish a multidisciplinary threat assessment team
2. Define prohibited and concerning behaviors
3. Create a central reporting mechanism
4. Determine the threshold for law enforcement intervention
5. Establish threat assessment procedures

[1] Cited in School Threat Assessment Toolkit, pp. 20-21, National Center for School Safety.

6. Develop risk management options
7. Create and promote safe school climates
8. Conduct training for all stakeholders

B. Definitions and descriptors

1. Threat assessment: A fact-based process of identifying, assessing, and managing behavior that may pose a risk of violence or other harm to self or others.

2. Threat assessment team: A multidisciplinary team that includes, but is not limited to, persons with expertise in counseling, instruction, school administration, and law enforcement that conducts threat assessments in a public school unit when threatening behavior has been communicated and when a student has engaged in threatening behavior that warrants further evaluation. When practicable, at least one school psychologist, one staff member knowledgeable about and experienced in working with students with special needs, and one staff member knowledgeable about and experienced in working with students with disabilities shall be assigned to the threat assessment team. The school may assign a licensed mental health professional if a school psychologist is unavailable. Members of a threat assessment team who are not employees of the public school unit may review student records as provided in 34 C.F.R. § 99.31(a)(1)(i)(B) according to a written agreement with the school of the requirements and responsibilities for use of student records under the federal Family Educational Rights and Privacy Act.

3. Threatening behavior - "Serious Threat" defined: Any communication or action that indicates that an individual poses an actual or foreseeable likelihood of (1) endangering the physical safety of oneself or others, (2)a material or substantial disruption to school operations or its educational mission; or (3)other behavior constituting or appearing to constitute a violent crime. A Serious Threat may be expressed or communicated orally, visually, in writing, electronically, or through any other means.

Examples of behaviors (including social media posts or other communications) raising reasonable concern of a serious threat may include, without limitation:

1. Escalating anger or aggressive behavior
2. Significant changes in behavior and appearance
3. Expressions of suicidal ideations
4. Writing about violence or weapons
5. Cutting off communications
6. Stalking and harassing behaviors
7. Increased depression
8. Increased use of drugs or other harmful substances
9. Erratic behavior
10. Purchasing weapons
11. Threats of domestic violence

12. Acting paranoid

5. Staff duty to report

All school staff members must immediately report any threat or concerning behavior by any individual (an "Identified Individual"). All school community members, including students, parents, and guardians, are urged to report threats or concerning behaviors. Reports can be made through the anonymous tip line **1-844-5-SayNow, The Say Something Anonymous Reporting App** or reported directly to the Head of School or designee.

6. Threat Assessment Team

A. Establishment. The Head of School shall establish a multidisciplinary Threat Assessment Team (the "Team"). The Team will assess and intervene with Identified Individuals whose behavior may threaten the safety of school staff or students. The Team shall include but not be limited to persons with expertise in counseling, instruction, discipline, and school administration. When practicable, the Team will include the school psychologist, a licensed mental health professional, school resource officer (SRO), and staff members knowledgeable about and experienced in working with students with special needs and disabilities. Members of a threat assessment team who are not employees of the school may review student records as provided in 34 C.F.R. § 99.31(a)(1)(i)(B) according to a written agreement with the school of the requirements and responsibilities for the use of student records under the federal Family Educational Rights and Privacy Act (FERPA).

B. Team Duties. The Team shall:

1. Provide training to students, faculty, and staff regarding recognizing and reporting threatening behavior that may indicate a risk of harm to the community, school, or self.
2. Establish a written policy or procedure defining how threats will be assessed, including any scale or classification system that will be used to indicate various threat levels and the standard response to each.
3. Identify members of the school community to whom threatening behavior should be reported.
4. Implement other policies adopted by the Board of Directors.
5. Utilize anonymous reporting applications for students to share information about school safety concerns requiring investigation.
6. Upon finding a credible threat, the Team may take any of the following actions:
    a. Recommend that the individual involved be referred for mental health services. If the individual is a student or minor, the parents shall be notified of the recommendation and encouraged to contact the student's

primary care provider, insurance, or the local Medicaid management entity or managed care organization.

b. Provide notice to individuals who are the subject of threatening behavior and, if the individual is a student or a minor, provide notice to the student's parent or legal guardian. All notices shall be subject to the Family Educational Rights and Privacy Act, 20 27 U.S.C. § 1232g.

c. Provide notice to the appropriate local law enforcement agency.

7. Any information shared among team members shall remain confidential, shall not be a public record subject to Chapter 132 of 31 the General Statutes, and shall only be released in connection with an emergency under the standards established by the Family Educational Rights and Privacy Act in 20 U.S.C. § 33 1232g(b)(1)(I).
8. Regardless of threat assessment activities, disciplinary action and referral to law enforcement are to occur as legally required.
9. Upon a preliminary determination of an Identified Individual, the Team shall immediately report its determination to the Head of School or designee. The Head of School or designee shall immediately attempt to notify the student's parent or legal guardian.
10. Nothing in this policy shall preclude school personnel from immediately addressing an imminent threat.
11. Nothing in this policy shall preclude the Team from notifying the Head of School or designee of any individual other than a student who poses a threat of violence or physical harm to self or others.
12. Upon a preliminary determination by the Team that an individual poses a threat of violence to self or others, exhibits significantly disruptive behavior, or needs assistance, members of the Team may request and obtain all relevant records, including discipline or criminal history record information (for adults and juveniles) and health and mental health records.
13. No team member shall re-disclose any criminal history record information or health information obtained under this section or otherwise use any record of an individual beyond the purpose for which such disclosure was made to the Team.
14. The Team may not maintain or make copies of the criminal history record.
15. Juvenile delinquency or criminal history information may not be placed in a student's central educational/scholastic record unless the school is taking disciplinary action related to the incidents. School staff, including members of the Team with a legitimate educational interest, may store information about such incidents in records maintained separately from the student's educational/scholastic record.

16. The completed threat assessment shall be placed in the student's confidential record, and the completed Notification document shall be placed in the student's cumulative file.
17. Reports and findings of the Team shall be maintained in confidence to the extent reasonably feasible.

Approved: March 18, 2025