

ADMINISTRATIVE PROCEDURE

2952.1

Procedure No.

January 18, 2023

Date

Behavior Threat Assessment – Employees, Volunteers, Contractors
Parents, Family Members, and Non-Affiliated Persons

- I. **PURPOSE:** The purpose of this administrative procedure is to establish a threat assessment process that provides prevention and intervention measures for employees, volunteers, contractors, parents, family members, and non-affiliated individuals whose behaviors pose a threat to the safety of the school or office/work environment.

- II. **POLICY:** The Board of Education is committed to providing safe and supportive learning and working environments for students, employees and visitors. To that end, the Board of Education directs the Chief Executive Officer to establish and maintain a behavior threat assessment process that provides appropriate measures to identify, assess, and intervene when an individual’s behavior may pose a threat to the safety of the school, students in the school, and employees in the workplace; to protect and support potential victims; and to provide assistance, as appropriate, to the individual being assessed. (Policy 2952)

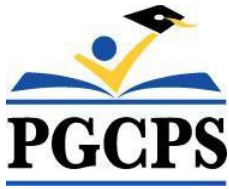
- III. **BACKGROUND:** In accordance with § 7-1507(c) of the Education Article, Annotated Code of Maryland, each local school system is required to adopt a model policy, consistent with the Subcabinet of the Maryland Center for School Safety’s (MCSS) *Model Policy for Behavior Threat Assessment*, for the establishment of behavior threat assessment teams whose functions include (but are not limited to), the development of a process for regular assessment and intervention, including mechanisms for identifying, assessing, and intervening with individuals whose behavior may pose a threat to the safety of the school or to an individual attending or working in a public school setting.

- IV. **DEFINITIONS:**
 - A. Behavior threat assessment – A comprehensive structured group process emphasizing an appraisal of observed (or reasonably observable) behavior used to identify, assess and manage the risk of threats of targeted violence posed by an individual or group.

 - B. Civil protective order/peace order – An order used by a court to protect a person, object, business, company or entity, or general public in a situation involving alleged domestic violence, child abuse, assault, harassment, stalking or sexual assault.

 - C. Designated Building Administrator – an administrator in a non-school setting who has been identified as administrator in charge of the building.

 - D. Employees Threat Assessment Oversight Team – A system-level team that conducts behavior threat assessments of alleged threats posed by employees,



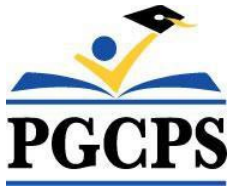
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volunteers, contractors, parents, family members, and other non-affiliated persons.

- E. Immediate supervisor – The person who has responsibility for directing, overseeing, or managing assigned employees’ daily activities, and/or evaluating them or conducting observations that would lead to an evaluation.
- F. Limited Alternative Placement — Time away from the employee’s regularly scheduled duty location which is authorized by an Instructional Director, Department Head or similar manager. The employee will be advised to report to a specific PGCPS location for the next 48 hours to allow for the completion of a worksite inquiry. During this time, the employee will remain in a paid status and without having to use their own leave.
- G. Non-affiliated person – A person who is not an employee, student, volunteer, contractor, family member or friend of a student or employee.
- H. Threat – An expression of an intent to cause physical harm to someone. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means; and is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat or observed by or communicated to a third party; and regardless of whether the target of the threat is aware of the threat. Threats may be direct (“I am going to beat you up.”), indirect (“I’m going to get him.”) or conditional (“Give me your money or you will regret it.”)
- I. Threat Levels
 - 1. Low Risk Threat: A low risk threat is one in which it is determined that the individual/situation does not appear to pose a threat of serious harm to self/others, and any exhibited issues/concerns can be resolved easily.
 - 2. Moderate Risk Threat: A moderate risk threat is one in which the person/situation does not appear to pose a threat of serious harm to self/other, at this time, but exhibits behaviors that indicate a continuing intent and potential for future violence or serious harm to self/others; and/or exhibits other concerning behavior that requires intervention.
 - 3. High Risk Threat: A high risk threat is one in which the person/situation appears to pose a threat of serious harm to self or others, exhibiting behaviors that indicate both a continuing intent to harm and efforts to



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acquire the capacity to carry out the plan; and may also exhibit other concerning behavior that requires intervention.

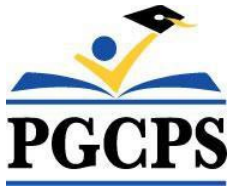
4. **Imminent Risk Threat:** An imminent threat exists when the person/situation appears to pose a clear and immediate threat of serious violence toward self or others that requires containment and action to protect identified or identifiable target(s); and may also exhibit other concerning behaviors that requires intervention.

J. **Trespassing** – The failure or refusal to leave the grounds of any public institution of elementary or secondary education after being requested to do so by a person with authority to limit or deny access.

V. **PROCEDURES:**

A. **Employees Working in their Assigned Work Location**

1. If the employee is actively in crisis (*e.g.*, has made a threat to self or has made a threat to harm others, or is engaging in other problematic behavior(s) that cause concern for safety), then the following actions must be taken:
 - a. Principal and/or Immediate Supervisor
 - 1) Assesses the situation, calls 911 (if the safety threat is moderate or high), calls the Safety and Security Services Department (301-499-7000), follows appropriate safety protocols (*e.g.*, lock down, shelter in place), and then **completes the Employees Observed Behavior Checklist (Attachment A)**.
 - 2) When calling 911, the principal/designated building administrator must get the police officer's name, report number and officer's ID number.
 - 3) Removes the employee to an isolated location (and arranges for continuous monitoring of the employee), if possible and safe to do so, and safely secures students, other employees and other individuals as appropriate. If it is not possible to remove the employee to an isolated location, remove students and others to another location.



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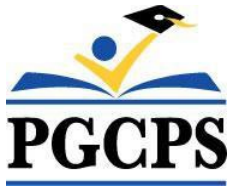
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- 4) If the employee is threatening to injure themselves, the principal/immediate supervisor is to contact the spouse, adult child, other family member, or individual listed on the employee's emergency contact information. If it is safe to do so, another staff member should remain with the employee until a family member arrives. If there are any known suicide ideation and/or attempt, the principal/immediate supervisor must contact the Area Office (Instructional Supervisor and Associate Superintendent) or appropriate Director and Chief, respectively. The principal's immediate supervisor in the Area Office must contact the division chief.
- 5) The principal or the immediate supervisor as applicable notifies the Area Office (Instructional Director and Associate Superintendent) or appropriate Director and Chief, respectively, **for all threat levels (Low, Moderate or High/Imminent)**. If the incident occurs during summer school, the central office summer school offices should be included in the notification.

B. Employees Visiting a Non-Work Location School or Office

1. If the visiting employee is actively in crisis (*e.g.*, has made a threat to self or has made a threat to harm others, or is engaging in other problematic behavior(s) that cause concern for safety), then the following actions must be taken:
 - a. Any employee assigned to that building who comes in contact with the visiting employee who is actively in crisis, or who is notified that such a situation has developed, must call 911 immediately and then call the designated administrator of the building.
 - b. The Chief Operations Officer maintains the list of designated building administrators for office buildings.
 - c. When calling 911, the principal/designated building administrator must get the police officer's name, report number and officer's ID number.
 - d. The principal/designated building administrator must immediately call the Safety and Security Services Department (301-499-7000) .



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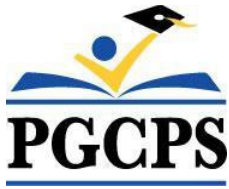
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- e. If the visiting employee is threatening to injure themselves, the principal/designated building administrator/designee must contact the spouse, adult child, other family members, or individual listed on the employee's emergency contact information. Another staff member should remain with the visiting employee until a family member arrives. The principal/designated building administrator/designee must contact the visiting employee's principal/immediate supervisor and inform them of the incident. The principal/immediate supervisor, in collaboration with the designated building supervisor, must complete the Employees Observed Behavior Checklist (Attachment A).
- f. The principal/designated administrator/designee must also contact the Chief of Human Resources Office (CHRO) to inform him/her of the incident..
- g. The principal/immediate supervisor notifies the Area Office (Instructional Director and Associate Superintendent) or appropriate Director and Chief **for all threat levels (Low, Moderate or High/Imminent)**. If the incident occurs during summer school, the central office summer school offices should be included in the notification.

C. Safety and Security Services Department

1. In collaboration with the employee's principal/immediate supervisor and designated building administrator, if appropriate, the Safety and Security Services Department investigates the situation further to determine, preliminarily, if the employee poses a low, moderate or high risk threat of violence to themselves or to others, and provides guidance to principal/immediate supervisor.
2. If the Safety and Security Services Department determines the employee poses a low risk threat, the principal/immediate supervisor will meet with the employees and issue corrective action (as appropriate).
3. If the Safety and Security Services Department determines the employee poses a moderate or high risk threat, Safety and Security Services, within 24 business hours of the threat will notify the Employees Threat Assessment Oversight Team of the incident and inform the employee's principal/immediate supervisor. Concurrently, the employee will be placed out on Limited Alternative Placement (if not already), by the employee's principal/immediate supervisor in consultation with Area Office leadership/appropriate director/chief.



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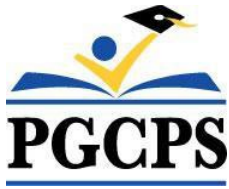
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4. The Employees Threat Assessment Oversight Team will convene within 48 business hours.
 5. The Safety and Security Services Department will enter the case in the Employees Behavior Threat Assessment Google database.
 6. The notification to the Employees Behavior Threat Assessment Oversight Team will include the following:
 - a. The name of the employee;
 - b. Location of the threat;
 - c. Nature of the threat;
 - d. Emergency Medical Services (EMS)/Police Department (PD) involvement, if any; and
 - e. Status of the employee's Limited Alternative Placement.
- D. Employees Behavior Threat Assessment Oversight Team is responsible for the following:
1. The Team, in consultation with the principal/immediate supervisor, conducts the behavior threat assessment by analyzing the following:
 - a. The exact nature and context of the threat and/or threatening behavior;
 - b. The identified target(s) (generic or specific);
 - c. The employees' apparent motivation;
 - d. The employees' intent;
 - e. The employees' ability to carry out the threat; and
 - f. The employees' background, including work history, criminal record, mental health history, including any diagnosed mental health issues, military history, and past behavior on the job.



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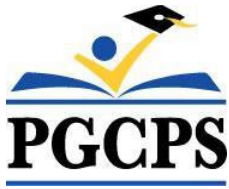
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2. The Team determines, based on the assessment (moderate or high risk), appropriate follow-up measures, which includes but are not limited:
 - a. Directing the principal/immediate supervisor to contact CHRO/designee (via EITS) and include the Employees Observed Behavior Checklist.
 - b. Directing the principal/immediate supervisor to provide the employee with Employees Assistance Program (EAP) information.
3. ELRO will:
 - a. Place the employee on administrative leave or temporary leave, if the employee has not already been so placed.
 - b. Request additional information from the employee's medical/mental health provider (Certificate of Medical Release Form - Attachment B).
 - c. Based on the information provided on the Certificate of Medical Release, ELRO will consider whether to request an Independent Medical Exam to determine the employee's fitness for duty (*i.e.*, fitness to work with and supervise students, if school-based, or fitness to work for non-student position.)
 - d. Consider possible disciplinary action.

E. Parents, Family Members, Volunteers, Contractors, and Non-affiliated Persons

1. The following actions must be taken when there are threats by parents, family members, volunteers, contractors or non-affiliated persons:
 - a. The principal/designated building administrator must immediately: 1) call 911; and then 2) call the Safety and Security Services Department.
 - b. When calling 911, the principal/designated building administrator must get the police officer's name, report number and officer's ID number.
 - c. Following the incident, the principal/designated building administrator will issue a No Trespass Letter, if appropriate, to the individual making the threat.



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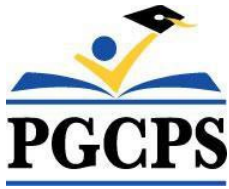
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2. Threats of Domestic Violence

- a. If there is a threat by a domestic partner, – the principal/designated building administrator must immediately: 1) call 911; and then 2) call the Safety and Security Services Department.
- b. When calling 911, the principal/designated building administrator must get the police officer’s name, report number and officer’s ID number.
- c. The principal/designated building administrator shall issue a No Trespass Letter to the individual making the threat.
- d. Identifying and Reporting Threats of Domestic Violence
 - 1) All employees are required to report to their principal/immediate supervisor any threats of domestic violence that they have witnessed or of which they have knowledge, whether they were personally impacted by the domestic violence or not.
 - 2) Employees who have not secured a protective order but have safety concerns regarding domestic/intimate partner violence shall report their concerns to their principal/immediate supervisor.
 - 3) Employees who have secured a permanent protective order which list the workplace as a protected area are required to promptly inform their principal/immediate supervisor, who will send a copy of the permanent protective order to the Safety and Security Services Department.
 - 4) Upon receipt of this information regarding a threat of domestic violence, the principal/immediate supervisor will work with the Safety and Security Services Department to develop a workplace safety plan.
- e. Training
 - 1) The Safety and Security Services Department will provide training to principals and administrative staff on the following:
 - a) Warning signs that an employee might be in a violent relationship;
 - b) Dynamics of intimate partner violence;



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- c) Methods of responding to reports of workplace threats arising from abusive relationships; and
- d) Key elements of a workplace safety plan.

- 2) Principals and administrative staff will share this information with their direct reports.

F. Resources

1. **Employees Assistance Program:** Call 800-346-0110
2. **Prince George’s County Hotline:** Call 301-927-4500
3. **The Prince George’s County Community Crisis Hotline:** Call 800-422-0009

VI. MONITORING AND COMPLIANCE:

- A. Principals/immediate supervisors are responsible for documenting in EITS any moderate or high risk threats of violence by employees.
- B. The Safety and Security Services Department is responsible for entering any cases of threats of violence by employees, volunteers, contractors, parents, family members and other non-affiliated persons in the Employees Behavior Threat Assessment Google database.

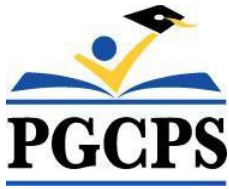
VII. RELATED POLICIES AND PROCEDURES:

- Policy 2214 – Trespass Warnings
- Administrative Procedure 2950 – Procedures for Crisis Response
- Administrative Procedure 2952 – Student Behavior Threat Assessment Process
- Administrative Procedure 4156 – Granting of Administrative Leave, Limited Alternative Placement or Temporary Placement for Employees

VIII. LEGAL REFERENCE:

Maryland Safe to Learn Act, Annotated Code of Maryland, Education Article §§ 7-1501, *et seq.*

- IX. **MAINTENANCE AND UPDATE OF THESE PROCEDURES:** This administrative procedure originates with the Chief of Human Resources and the



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Director of the Safety and Security Services Department and will be updated as needed.

X. **CANCELLATIONS AND SUPERSEDURES:** None. This is a new administrative procedure.

XI. **EFFECTIVE DATE:** January 18, 2023

Attachment(s):

Attachment A: Employees Observed Behavior Checklist

Attachment B: ELRO Certificate of Medical Release

Attachment C: Rapid Response Cheat Sheet