CHAPTER 5

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.

Following the shooting at Columbine High School in 1999, the U.S. Secret Service partnered with the U.S. Department of Education to study school violence. Completed in 2002, the Safe School Initiative examined 37 incidents of targeted violence that occurred at elementary and secondary schools (i.e., K–12). The study sought to analyze the thinking and behavior of students who committed these acts from an operational perspective. Its key findings include:

- Incidents of targeted violence at K–12 schools were rarely sudden or impulsive acts.
- Prior to most incidents, other people knew about the attacker’s idea and/or plan to attack.
- There is no accurate or useful “profile” of students who engaged in targeted school violence.
- Most attackers engaged in some behavior prior to the incident that caused others concern or indicated a need for help.

- Most attackers had difficulty coping with significant losses or personal failures. Moreover, many had considered or attempted suicide.
- Many attackers felt bullied, persecuted, or injured by others prior to the attack.
- In many cases, other students were involved in some capacity.

One of the study’s most significant findings was that, prior to most attacks, other students knew of the attackers’ plans, yet most did not report it to an adult. This finding led the two agencies to conduct a follow-on effort titled the Bystander Study, which was released in 2008. The study explored barriers that may prevent someone from coming forward in advance. A series of in-depth interviews were conducted with persons who did not come forward before an attack took place, as well as those who did come forward and thereby helped to avert a potential school-based attack. The study concluded:

- The relationships between the bystanders and the attackers, and when and how the bystanders came upon information about the planned attacks, varied.
- Bystanders’ willingness to share information ranged from those who took no action to those who actively conveyed their concerns.
- School climate affected whether students came forward.
- Some students did not come forward because they disbelieved that the attacks would occur or they misjudged the likelihood and immediacy of the planned attack.

- In some situations, parents and parental figures influenced whether the bystander reported the information to school staff or other adults in positions of authority.
Based on the above, it is clear that there exists an opportunity to customize or expand the framework of suspicious activity reporting to include the identification and reporting of student behaviors of concern. Outreach campaigns, such as the U.S. Department of Homeland Security’s (DHS) “If You See Something, Say Something®” campaign, and similar state-specific programs, are essential to both encouraging and facilitating the reporting of suspicious activities or other concerning behavior. They not only remind individuals that it is important to stay vigilant and report things that appear out of the ordinary, they also provide guidance on both what should be considered concerning and how and to whom to report it.

Reporting suspicious or concerning behavior on its own, however, will not prevent a violent act from occurring. The reported information must be appropriately evaluated and, if determined to indicate a legitimate potential threat or concern, properly acted upon. This typically means the conducting of a threat assessment.

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.

Research has shown that threat assessment programs are beneficial, including in preventing mass casualty shootings. For instance, a 2008 field study examined 209 student cases from 103 schools that were referred to a centralized threat assessment team because the student had communicated a threat to commit a violent act resulting in a long-term suspension. For each case, the threat assessment team conducted interviews, assessed the threat, and developed a written report containing findings and recommendations. The results of the threat assessment concluded that all but five students should be returned to school, and none of the alleged threats were carried out.5

A 2009 study examined data gathered from Virginia’s 2007 annual school safety audit. It showed that 95 schools had adopted the Virginia threat assessment guidelines, 131 schools used locally developed threat assessment procedures, and 54 reported not using a threat assessment approach. Students were randomly selected from these 280 schools and administered a school climate survey. The schools that used a threat assessment approach had lower rates of bullying and fewer long-term suspensions. Further, students had a greater willingness to seek help for bullying and threats of violence, and had a more positive perception of their school climate.6

The importance of suspicious activity reporting and the establishment of threat assessments has been a common theme identified in the wake of past school shootings. The Virginia Tech Commission’s report recommended that states “[e]ducate and train parents, teachers, and students to recognize warning signs and known indicators of violence and mental illness and to alert those who can provide for safety and treatment” and to “[e]stablish and publicize widely a mechanism to report and respond to reported threats of violence.”7 The report also noted that creating interdisciplinary teams to evaluate information reported by students and staff, assess the degree of threat, and intervene to preempt the threat was an effective practice.8 It recommended that federal agencies work together and with other appropriate partners to share information on and best practices in behavioral analysis, threat assessments, and emergency preparedness.9 The Obama Administration’s plan also discussed suspicious activity reporting, and proposed clarifying that no federal law prevents healthcare providers from warning law enforcement authorities about threats of violence.10

The Columbine Review Commission report stressed the need for school officials to overcome the “code of silence” that often prevented the reporting of concerning behavior. It recommended all schools establish and encourage students to use an anonymous telephone line or other mechanism to report statements or behavior that they found concerning.11 The report also recognized the value of threat assessment teams, recommending that they “should be established at
every Colorado high school and middle school.” The Sandy Hook Advisory Commission report discussed how schools can be designed in a way to facilitate the observation of changes in behavior that may be of concern and should be reported. Various states and districts have implemented suspicious activity reporting and related threat assessment programs. For instance, in 2004 under Governor Bill Owens, the State of Colorado created Safe2Tell to deliver a statewide anonymous 24-hour reporting tool where parents, students, teachers, school administrators, law enforcement, and others can report a perceived threat to their safety or the safety of others. The reporting tool can be accessed from the Safe2Tell website, calling into the hotline, or through an application on a mobile phone. When imminent action is needed on a report, Safe2Tell passes along the information to local school officials and law enforcement. Also, an accountability component was developed to confirm that every report that comes in is investigated by school and law enforcement agencies, that action was taken, and that the outcome was tracked. In May 2014, Colorado incorporated Safe2Tell under the Colorado Office of the Attorney General to ensure reporting avenues, trainings, and education and awareness efforts are available across the entire state. Similarly, in 2013, Virginia was the first state to pass a law requiring every school in the state to establish a threat assessment team.

**Commission Observations**

**Suspicious activity reporting**
The Nationwide Suspicious Activity Reporting Initiative has issued a publication that provides an overview of some of the key characteristics of an effective suspicious activity reporting program. These include the timely vetting of reports received, educating the community on the reporting process, complementary training for staff, and privacy protections.

**Outreach Campaigns:** During the August 16 Commission meeting, Officer Chris Fraley, Region 2 Director for the National Association of School Resource Officers, told Commission members: “students are a source of valuable information through social media and talk amongst their peers of potential threats or incidents that are being planned. Security in the school building also involves the promotion of see something, say something wherein the students and staff report crime or suspicious activity.”

Visible public awareness messaging campaigns increase vigilance and reporting of suspicious behavior. Successful campaigns, such as the “If You See Something, Say Something®” campaign, typically perform outreach through multiple means, both physically and online. This includes posters, factsheets, infographics, websites, audio and video public service announcements, and public events. Simple messaging focused on what suspicious activity or concerning behavior looks like and how to report are the hallmarks of many of the major campaigns.

Colorado’s Safe2Tell program similarly uses a variety of methods to raise awareness, including age-appropriate videos, posters, direct messaging, and classroom discussions. By combining direct messaging along with relevant promotional materials, Safe2Tell effectively spreads its message and tip line number to thousands of students each year. Data shows that more Safe2Tell tip reports come from schools that incorporate the Safe2Tell solution in all practices. Many campaign organizers also encourage partnering with other organizations to help expand the reach of the messaging. For example, in the execution of the “If You See Something, Say Something®” campaign,
DHS partners with states, cities, and counties; airports and mass transit entities; sports leagues and teams; major sports events and entertainment venues; colleges and universities; fairs and festivals; private sector businesses; and media outlets. Partners typically work together to tailor campaign messages and distribution mechanisms to their specific stakeholder community. All school districts are encouraged to work with DHS to obtain official “If You See Something, Say Something®” materials that increase awareness of the importance of reporting suspicious activity or concerning behavior within their school community. Anonymous Reporting: As early as the Columbine Commission Report, experts have recognized the importance of providing a mechanism for anonymous reporting. Numerous witnesses at various Commission events concurred, including Chris Harms, Director of the Colorado School Safety Resource Center; Marguerite Herman, Federal Legislative Chair of the Wyoming Parent Teacher Association; and Trisha Daniel, Nationally Certified School Psychologist from the Alabama Association of School Psychologists. Anonymous reporting can be done through various means (e.g., mobile applications, online, email, and phone). It is now a commonplace part of many statewide safety tip lines, such as Michigan’s OK2SAY, Wyoming’s Safe2Tell Wyoming, Utah’s SafeUT, and Nevada’s SafeVoice.

Anonymous reporting is not without its challenges. For example, it sometimes can make it more difficult to evaluate the veracity of a tip and may increase the likelihood of an individual using a reporting system as a means for harassment or false accusations. However, these challenges are considered infrequent and far outweighed by the benefits of allowing anonymous reporting. Further, they can be greatly mitigated through the incorporation of protocols to ensure that all reports are properly evaluated by trained staff and handled with appropriate discretion.

Complementary Training: Training individuals on how to implement a program is critical to its continued success. As Safe2Tell founder Susan Payne pointedly stated in her testimony to the Commission, “we do not rise to the level of expectation in a crisis, we fall to our level of training.” In acknowledgement of this, the National Suspicious Activity Reporting Initiative calls training one of the 10 key elements to successfully integrating suspicious activity reporting into an organization’s operations. In the case of suspicious activity reporting and “If You See Something, Say Something®” campaigns, this includes training the intended audience on how to identify and report suspicious behavior as well as training the recipients of the suspicious activity reporting on how to manage and respond to incoming reports.

In her testimony, Payne provided an overview of the many ways in which Safe2Tell raises education and awareness of the program. Its methods include:

- **Train the Trainer Certifications and Staff Trainings.** Safe2Tell developed a training program that certifies individuals and leaders to present Safe2Tell information, materials, and classroom discussion materials to their communities and schools.
- **Conversation Jumpstarts.** Safe2Tell developed educational lessons to provide school staff a tangible tool to lead guided classroom discussions. Available Conversation Jumpstart topics include bullying, cyberbullying, dating, sexting, weapons, depression, and substance abuse. While discussing issues, trainers talk about the code of silence, when it is appropriate to make a report, and what happens when a report is made.

As part of its “See, Say, Do Something” campaign, in May 2018 the Dallas (TX) Independent School District (Dallas ISD) brought thousands of its students to the city’s American Airlines Center to talk about how to prevent and respond to gun violence in schools. At the event (which was planned with help from the International Association of Venue Managers), representatives of the DHS, the Federal Bureau of Investigation, Dallas ISD police, and other officials spoke with students about the importance of being vigilant in observing and reporting classmates’ behavior. This event is a potential model for high-impact community outreach and training.

Another example of a successful approach to suspicious activity reporting training is the Transportation Security Administration’s (TSA’s) First Observer Plus™ Program, which TSA offers as a complement to the
“If You See Something, Say Something®” campaign. The First Observer Plus™ Program is a security awareness and training program meant to deliver a simple message to surface transportation professionals to “Observe, Assess, and Report” suspicious activity. Through online and in-person training, the program provides transportation professionals tools to recognize suspicious activity possibly related to terrorism, guidance in assessing what they see, and a method for reporting those observations. Training participants are instructed not to intervene or engage suspicious persons or items, but to follow their organization’s policy for reporting information to local law enforcement and, when possible, to TSA by calling 1-844-TSA-FRST. The TSA First Observer Plus™ Program is available to school transportation frontline employees. Over the past few years, TSA employees have conducted more than 1,000 online school bus training registrations as well as in-person training for more than 200 school bus professionals.

Privacy Protections: As John Verdi, Vice-President of Policy at the Future of Privacy Forum, stated during the July 11 Commission meeting: “trust between students and adults is crucial to ensure that children reach out for help when they need it and report concerns about other students when they have them. Maintaining appropriate safeguards for students’ privacy helps create and maintain that trust.”

During the design and execution of any suspicious activity reporting program it is important to incorporate appropriate privacy protections and to comply with privacy laws. This can raise additional complexities in the school environment where privacy rights embedded in both the Family Educational Rights and Privacy Act (FERPA) and the Health Insurance Portability and Accountability Act (HIPAA) may apply. As multiple witnesses noted during the July 11 Commission meeting, there often is some confusion regarding what information legally can be shared and with whom when it involves the behavior or mental health history of a student.

The Guide for Developing High-Quality School Emergency Operations Plans, which was issued by the U.S. Departments of Justice, Health and Human Services, Homeland Security, and Education in 2013, provides guidance on how FERPA and HIPAA affect the ability to share and act upon suspicious behavior reported in a school environment. Additionally, the Nationwide Suspicious Activity Reporting Initiative has issued a Privacy Fact Sheet with some general tips on how to incorporate privacy into suspicious activity reporting efforts. For additional information on FERPA and HIPAA, see Chapters 17 and 18 of this Report.

**Threat assessment teams and comprehensive targeted violence prevention programs**

In July 2018, the U.S. Secret Service National Threat Assessment Center published *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*. It notes the following: “[e]nsuring the safety of our schools involves multiple components, including physical security, emergency management, and violence prevention efforts in the form of a threat assessment process. This process begins with establishing a comprehensive targeted violence prevention plan.”

Numerous witnesses stressed the importance of threat assessment teams during Commission meetings, including Donna Michaelis, Manager for the Virginia Center for School and Campus Safety; Kathy Martinez-Prather, Director of the Texas School Safety Center; and Dr. Kathy Murphy, Superintendent of Hoover (AL) City Schools.

In its *Operational Guide for Preventing Targeted School Violence*, the U.S. Secret Service enumerated the following eight steps for creating a comprehensive targeted violence prevention plan.
8 Steps for Creating a Comprehensive Targeted Violence Prevention Plan

**STEP 1: Establish a multi-disciplinary threat assessment team.** Threat assessments are best performed by multi-disciplinary teams that include highly trained professionals from a variety of different disciplines (e.g., teachers, administrators, school resource officers, school psychologists, guidance counselors). The team will conduct the threat assessments, implement crisis prevention when needed, assess the student’s potential for violence, and develop intervention and management strategies to mitigate that risk.

**STEP 2: Define behaviors to include those that are prohibitive and concerning.** Prohibited behaviors should trigger immediate intervention. These behaviors can include, but are not limited to, intimidation, threats, harassment, bullying, and carrying weapons on school property. Concerning behaviors may indicate the need for a threat assessment. These behaviors can vary in nature, but may include sudden or dramatic changes in mood and appearance or a decline in school performance. There should be a low threshold of concern so that the plan addresses a continuum of concerning behaviors, not just direct threats or behaviors indicative of planning for an attack.

**STEP 3: Establish and provide training on a central reporting system.** This can include an online form on the school website, email address, phone number, smartphone application, or other mechanism. It is also important to ensure the reporting tool is continually monitored, each report is followed up, and that it allows individuals to report anonymously. Programs and policies must be put into place that promote a climate that ensures those reporting feel safe in their concern and break down the code of silence.

**STEP 4: Determine the threshold for law enforcement intervention.** Although the majority of cases will be handled using school or community resources (e.g., mentoring, counseling, tutoring, and social or family services), some will require law enforcement, especially if there is a safety risk.

**STEP 5: Establish replicable threat assessment procedures.** These procedures include practices for maintaining documentation, identifying sources of information, reviewing records, and conducting interviews with an emphasis on rapport building. Procedures should include the following investigative themes to guide the assessment process: Motive, Communications (unusual or concerning), Inappropriate Interests, Weapons Access, Stressors, Emotional and Developmental Issues, Desperation or Despair, Violence as an Option, Concerned Others, Capacity to Organize an Attack, Pre-Attack Planning Behaviors, Consistency Between Students’ Actions and Statements, and Protective Factors.

**STEP 6: Develop risk management options.** Threat assessment teams should develop a set of risk management options that can be implemented once an assessment is complete. Based on the information developed by the team, an individualized management plan can be created to mitigate any identified risks. Other components of management include notifying law enforcement if an attack is imminent, ensuring the safety of potential targets, creating a situation less prone to violence, and reducing the effect of stressors.

**STEP 7: Create and promote a safe school climate.** School climates should facilitate a culture of safety, respect, trust, and emotional support, where open communication is encouraged, school staff intervene in conflicts and bullying, and students feel empowered to share their concerns.

**STEP 8: Provide training for all stakeholders.** As Donna Michaelis stated at the August 16 Commission meeting, “Training is absolutely vital to the success of a threat assessment program.” Recipients of the training should include faculty, staff, and administrators; students; parents; and school resource officers and local law enforcement. Topics covered by the training might include how to recognize and report concerning behavior, suicide prevention, conflict resolution, and de-escalation techniques.
As more and more states, localities, school districts, and schools begin implementing threat assessment and targeted violence prevention programs, they are developing new approaches. Thus far, three states—Virginia, Florida, and Maryland—have legally mandated the use of threat assessment teams in all public K–12 schools or school systems. Under these laws, the local or district school board must adopt policies for the establishment of threat assessment teams that can assess and intervene against individuals whose behavior may pose a threat to the safety of school staff or students. The policies must include procedures for referrals to approved community service boards, healthcare providers, or mental health services, when appropriate.

Funded under California’s Mental Health Services Act, the Los Angeles Police Department created a School Threat Assessment Response Team (START) program to address the need for comprehensive threat prevention and management. In collaboration with the Los Angeles Police Department, START works to address school violence by providing training to communities on risk/threat assessment and developing multi-disciplinary Crisis or Threat Management Teams. The program also assists educational institutions with case consultations, conducting threat assessments, and implementing intervention response and case management plans. It has fielded more than 8,000 calls since its establishment in 2009.
Recommendations
Based on the information contained in this chapter, the Federal Commission on School Safety offers the recommendations below.

**FEDERAL GOVERNMENT**

1. The federal government should develop options to support the creation (in conjunction with federal and state partners) of guidance for state and local jurisdictions to implement a comprehensive early warning and reporting system modeled on programs like “If You See Something, Say Something®” and Safe2Tell.

2. 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 to and educate their peers. In recognition of that, the U.S. Department of Homeland Security (DHS) and the U.S. Department of Education should explore sponsoring a Peer-to-Peer Competition Challenge for high school students to develop school security campaigns.

3. To assist schools and school districts in establishing threat assessment teams and targeted violence prevention programs, DHS, as warranted, should periodically update its *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*. Additionally, DHS should develop options for supporting the development of a train-the-trainer program to facilitate consistent application of the recommended practices contained in the Guide.

**STATES & LOCAL COMMUNITIES**

1. 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.

2. 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.

3. 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.

4. 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.

Chapter 5 Endnotes


8. Ibid.

9. Ibid at p. 9.

10. Now is the time: The President’s plan to protect our children and our communities by reducing gun violence. (January 16, 2013), at p. 9.


12. Ibid at p. xvii.


14. To learn more, visit: https://safe2tell.org.

15. Many other states have enacted similar programs, to include Michigan’s OK2SAY (https://www.michigan.gov/ok2say/), launched in September 2014 under Governor Rick Snyder; Utah’s SafeUT (https://healthcare.utah.edu/unl/programs/safe-ut-smartphone-app/), launched in January 2016 under Governor Gary Herbert; Wyoming’s Safe2Tell (http://safe2tellwy.org/), launched in October 2016 under Governor Matt Mead; Oregon’s SafeOregon (https://www.safeoregon.com/), launched in January 2017 under Governor Kate Brown; Nevada’s SafeVoice (http://safevoice nv.org/), launched in January 2018 under Governor Brian Sandoval.