

From: [Jackie Schramm](#)
To: [Plan Commission Comments](#)
Subject: Holy Name Heights Zoning Change
Date: Monday, November 13, 2023 5:34:42 PM

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Hello,

I just wanted to express my total support in the change of zoning to allow St Ambrose School to move into Holy Name Heights. I think this is a wonderful idea and ideal fit for our property. Plus it's a great fit for the school with the grounds, auditorium, and gymnasium.

We all knew we moved into a mixed-use building. If some choose to leave at lease renewal time, then they have that choice. Though I truly hope and suspect that their fears about the school will not come to fruition. And I hope they are pleasantly surprised by how the school will positively impact our living experience here at Holy Name Heights.

Sincerely,
Jacqueline Schramm
706 S High Point Rd Apt 308
Madison WI 53719
262-374-0724

From: [Stephanie Lemancik](#)
To: [Plan Commission Comments](#)
Subject: Item 79963.
Date: Sunday, November 12, 2023 5:34:55 PM
Attachments: [WI_School_Safety_framework.pdf](#)

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Dear City of Madison Planning Commission,

As a resident of Holy Name Heights that opposes Item 79963, "Add private middle/high school tenant (St Ambrose Academy) to "Holy Name Heights" mixed-use development", I would like to share following two documents:

First, an article by the Wisconsin State Journal:

https://madison.com/st-ambrose-wants-to-land-at-holy-name/article_2c8ee29f-43d1-5958-a6b1-5bcf13468ec1.html#:~:text=The%20Holy%20Name%20Heights%20apartments,classrooms%20for%20a%20new%20school.

The article nicely details the situation and provides perspectives of a few of the residents based on discussions many of us have had as a group.

The second is attached to this email "WI School Safety Framework" and details guidelines for school safety that we feel the building would not be able to offer the students of St Ambrose.

Thank you for your consideration,

-Stephanie Lemancik

COMPREHENSIVE SCHOOL SECURITY FRAMEWORK



MAKING WISCONSIN SCHOOLS SAFER



WISCONSIN DEPARTMENT OF JUSTICE

**JOSHUA L. KAUL,
ATTORNEY GENERAL**

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The purpose of these materials is to guide and support efforts to improve school safety. Every effort has been made to be as accurate as possible. However, this document does not constitute either an informal or formal opinion of the Wisconsin Attorney General or the Wisconsin Department of Justice as described in Wis. Stat. § 165.015(1). It does not constitute legal advice or counsel. It does not create an attorney-client relationship. It creates no rights beyond those established under the constitutions, statutes, regulations and administrative rules of the United States and the State of Wisconsin. It does not attempt to provide answers to every question that may arise regarding school safety. Many factors affect school safety and the likelihood of violence. You should review the statutes and regulations governing schools and consult an attorney for specific information and advice when necessary and appropriate.

This document may be superseded or affected by newer versions and/or changes in the law.

Revisions to this Framework:

1st Edition, March 2019

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A LETTER FROM ATTORNEY GENERAL JOSH KAUL

Dear Partners in School Safety:

The safety of our children is a shared responsibility. Parents, educators, law enforcement, medical and mental health professionals, and policymakers must work together to keep kids safe every day.

At the Wisconsin Department of Justice, we hope that everyone sharing the responsibility of child safety can use this guide to make schools safer:

- Build a comprehensive mental health structure;
- Shape a school climate that reduces violence;
- Harden physical buildings;
- Launch a threat assessment that can stop a tragedy before it happens;
- Create routine safety controls to ensure every person is committed to security;
- Construct a strong relationship with first responders.



This guide is a roadmap to a safer school. It offers methods that can be shaped to fit any school in Wisconsin.

Thank you to all those who contributed to this guide for your efforts to ensure that schools in Wisconsin are provided with information about how to improve safety.

To those using this guide: thank you for your dedication to Wisconsin's children.

Sincerely,

Joshua L. Kaul
Joshua L. Kaul
Attorney General

ACKNOWLEDGEMENTS

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- Jason Veaser, Lieutenant, Kewaunee County Sheriff’s Department
- Charlie Schneider, Facilities Management Executive Director, CESA 10

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- *Standard Response Protocol* and *Standard Reunification Method*. Quoted material throughout this Framework used with permission of John-Michael Keyes, [I Love U Guys Foundation](#), Bailey, CO.

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INTRODUCTION

The *Comprehensive School Security Framework* is a collaborative effort to provide schools and stakeholders with a comprehensive set of policies, practices, and procedures that support the safety efforts of local schools and communities. This document can help guide local efforts to prevent, mitigate, prepare for, respond to, and recover from violence. It begins by suggesting best practices for preventing violence through climate and culture, student engagement, school policies, and physical structure. It discusses how to assess and address potential violence indicators and divert identified hazards before violence takes place. When violence occurs, the *Framework* addresses how proper planning, preparation and training can minimize the severity of the incident and help the school recover more quickly.

The *Framework* will provide concrete illustrations of best practices, modeling examples worthy of emulation by other schools and law enforcement agencies.

FOUNDATION AND PHILOSOPHY

Wisconsin has a proud history of local control of public, private, charter, and tribal schools. As part and parcel of local control, every school bears local responsibility for protecting its staff and students. This responsibility lies squarely on the school board or governing council, school administrators, staff, teachers, and even students. The duty to protect our children cannot be transferred to another party or surrendered to others in the belief that any school is somehow invulnerable to violent acts.

This *Framework* recognizes that there isn't a "one size fits all" approach to school safety. Unique local conditions, facilities, resources, and needs can create situations demanding individualized solutions. For example, Bayfield School District's LaPointe Elementary School on Madeline Island will have unique considerations that differ from Kenosha's 2,200-student Indian Trail High School. These differences must be addressed in planning. That said, most schools share similar operational formats, facilities, and processes, and should therefore consider similar, if not identical, safety practices. These best practices are addressed in this manual.

SAFETY DEMANDS A COMPLETE, COMPREHENSIVE APPROACH

This *Framework* provides guidance for schools to evaluate and enhance local efforts to bolster school safety. Unfortunately, there isn't one simple tool that prevents violence, and even comprehensive efforts cannot guarantee complete immunity. However, schools that adopt comprehensive best practices minimize the chance of serious violence and better recover from the effects of such incidents. Furthermore, such planning and preparation improves the school's response to other, more common crises, such as weather emergencies, community turmoil, student deaths outside school, etc.

As part and parcel of local control, every school bears local responsibility for protecting its staff and students. This responsibility lies squarely on the school board or governing council, school administrators, staff, teachers, parents, and even students.

What are the components of a comprehensive approach to school safety? The following example illustrates many of them, all of which will be expanded upon in this document.

The Happy School District is comprised of Joyful Elementary School, Delighted Middle School, and Cheerful High School.

Happy School District makes intense efforts to achieve a safe and healthy school climate. It conducts annual school climate surveys and invests significant effort into its school culture. This results in heightened social-emotional student satisfaction and reduces the number of "routine" school violence incidents.

HSD recognizes that school safety threats also emanate from outside the student body. All schools follow strict security practices that control access, screen visitors who enter the school, and utilize appropriate physical security measures. These security practices and physical improvements are based on regular, repeated security assessments performed in consultation with their local law enforcement agency.

Happy School District understands that many perpetrators "leak" their intent to commit violent acts. In order to identify potential problems before violence occurs, HSD conducts yearly staff training on Wisconsin's school violence mandatory reporting law. Furthermore, HSD has a systematic confidential or anonymous method by which students can report potentially concerning behavior.

Recognizing that even perfectly-performed school culture efforts will not succeed with every student, each school has established a School Safety Intervention Team (SSIT) comprised of the school principal, counselor, special education teacher, and school resource officer or other designated law enforcement officer. At least one member of the SSIT has completed Threat Assessment Team training, and at least one member has completed Adolescent Mental Health training. When potentially concerning behavior is reported, the SSIT immediately convenes to investigate the report and determine the best course of action. The classroom teacher, and any other school staff member sharing a bond with the concerned student, is included in SSIT meetings regarding the student.

The SSIT does not limit itself to assessing reported threats. It meets regularly to review and monitor the status of previously-identified individuals (students, staff, and members of the public). It ensures identified students continue to receive appropriate school intervention and assistance, and plans their reintegration into the school. It also requests yearly peer review as a quality assurance measure to ensure it is making appropriate, reasonable, and defensible decisions.

Positive school climate, physical improvements, and appropriate threat assessments cannot eliminate the chance of school violence or other crises, so HSD regularly rehearses its crisis response plans. The district has adopted the Standard Response Protocol and each school regularly conducts age-appropriate drills on lockout, lockdown, evacuation, and shelter-in-place procedures. Furthermore, the district conducts annual rehearsal of the Standard Reunification Method to ensure smooth post-crisis parent-student reunification. The district even provides parents with a pamphlet at the beginning of each school year explaining the district's emergency processes and requesting that parents update their information in the district's emergency notification system. Finally, HSD drills its crisis response plan outside of regular classroom hours and locations, ensuring staff and students know what to do before school, during lunch times, and in extra-curricular situations.

HSD's Emergency Operations Plan (EOP) follows FEMA guidelines and requires every school building to practice that building's individualized safety response plan. The EOP pre-plans and specifies general crisis processes, reunification locations, emergency processes, transportation needs, and identifies necessary Incident Command System (ICS) roles. The district has assembled ICS kits including identification garments, necessary forms, and other tools. Administrators and staff responsible for critical post-crisis functions have obtained FEMA ICS certification, and staff members have trained to take on duties above their planned role in the event the superior person is unavailable or trapped within the crisis site. The district has identified and pre-planned who it can call upon following an emergency to obtain assistance for staff and students. Counselors, psychologists, therapy animals, etc. from within the district, community, and surrounding areas are identified and regularly updated. Memoranda of Understanding (MOUs) are in place with neighboring public and private schools, conference facilities, churches, entertainment venues, and/or other facilities and organizations that will likely be needed for evacuation, reunification, or predictable services following a crisis.

Each building or other location regularly occupied by pupils has an individualized safety plan specific to that location, specifying such information as the shelter-in-place, evacuation, and rally points; specific crisis response options particular

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to the building; unique hazards or responses, etc. The school district also has a district-wide Emergency Operations Plan that coordinates the district-level response to crises.

Finally, HSD complies with applicable statutory reporting requirements. It regularly submits updated school maps to its law enforcement partners and the Wisconsin Department of Justice (DOJ) Office of School Safety (OSS); has the school board regularly review and approve the school safety plan and submits the plan to the OSS; and has the school board review annual violence drills within 30 days, submitting the reviews to OSS.

A school that implements only a few of these tools has more work to do. This *Framework* will review the lessons of previous events and summarize the best practices that schools have implemented around the country, in the knowledge that every Wisconsin school wants to adopt practices, policies, and procedures that protect its staff and students.

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SCHOOL CLIMATE

The United States Secret Service (USSS) and United States Department of Education (USDE) provide recommendations for eliminating the type of school culture that would foster threats of violence. They recommend that schools foster a culture of respect by offering positive role models, encouraging communication between adults and children, and mediating conflict constructively. Further, they state that schools should focus on developing a “culture of safety” where bullying is not acceptable behavior.

The USSS and USDE provide several guidelines for creating a safe and connected school climate:

- Assessment of the school's emotional climate;
- Emphasis on the importance of listening in schools;
- Adoption of a strong, but caring stance against the code of silence;
- Prevention of, and intervention in, bullying;
- Involvement of all members of the school community in planning, creating and sustaining a school culture of safety and respect;
- Development of trusting relationships between each student and at least one adult at school; and
- Creation of mechanisms for developing and sustaining safe school climates.

The Wisconsin Department of Public Instruction (DPI) provided the information below, with information and resources designed to assist schools in improving and maintaining healthy school climate.

“School climate is a broad, multifaceted concept that involves many aspects of the student's educational experience. A positive school climate is the product of a school's attention to fostering safety; promoting a supportive academic, disciplinary, and physical environment; and encouraging and maintaining respectful, trusting, and caring relationships throughout the school community no matter the setting—from Pre-K/Elementary School to higher education.”

- National Center for Safe and Supportive Learning Environments, United States Department of Education

School safety can be partially measured by how safe adults and young people feel in a particular school. The best assessments of school safety include these perceptual aspects as well as measurable (observable) factors. Likewise, school climate measurements include measures of school safety. It is not surprising, therefore, that improving school safety can positively affect a school's climate and, correspondingly, improving a school's climate can positively impact measures of school safety. Likewise, other aspects of school climate, such as connectedness or “the belief held by students that the adults and peers in their school care about their learning as well as about them as individuals”¹ is also highly interconnected with school climate and school safety.

FOUNDATIONAL COMPONENTS OF SCHOOL CLIMATE

Culturally Responsive Evidenced-Based Practices

Providing an environment in the classroom which is culturally responsive is important in building the bridge between the cultures of home and school. In order to make sure all students can succeed means understanding a student's cultural beliefs and practices. In using Culturally Responsive Practices, you are forming an understanding about the values, beliefs, and behaviors of

WISCONSIN SCHOOL SECURITY FRAMEWORK

people from cultures that may be different from one's own. Culturally responsive practices account for and adapt to the broad diversity of race, language, and culture in Wisconsin schools and prepare all students for interactions in a multicultural world.

Positive Behavioral Interventions and Supports (PBIS)

"PBIS is a systemic approach to proactive, school-wide behavior based on a Response to Intervention (RtI) model. PBIS applies evidence-based programs, practices and strategies for all students to increase academic performance, improve safety, decrease problem behavior, and establish a positive school culture."²

UNIVERSAL STAFF AND STUDENT COMPONENTS OF SCHOOL CLIMATE

Trauma Sensitive Schools

Exposure to traumatic events in childhood is extraordinarily common. Although not all exposure to trauma leads to difficulty in functioning, research tells us that exposure to trauma and toxic stress changes people. Just as a physical assault on the body can cause bodily impairment, psychological trauma can result in a mental injury that impacts such things as a child's ability to regulate emotions, attend to classroom activities, and/or achieve normal developmental milestones. Schools have a great ability to prevent and mitigate the impacts of traumatic exposure on our youth. By becoming a trauma-sensitive school, schools can become a protective factor for these students and increase the social and emotional and academic skills of the entire school body. Free learning modules for schools to follow can be found on the DPI website.

Social Emotional Learning

Social and Emotional Learning (SEL) is the process through which children and adults acquire and effectively apply the knowledge, attitudes, and skills necessary to understand and manage emotions, set and achieve positive goals, feel and show empathy for others, establish and maintain positive relationships, and make responsible decisions. SEL is, therefore, an essential part of school safety, school climate and school connectedness. DPI recently released the guide "*Social Emotional Learning Competencies*" and related resources and materials.

Mental Health Awareness and Wellness Education

Youth Mental Health First Aid (YMHFA) is a training which helps school employees and other adult community members identify and help youth ages 12-25 who are facing a mental health crisis. YMHFA has had several grant funding sources in the recent past from the Wisconsin Department of Justice and the Wisconsin Department of Public Instruction. Trainings can be accessed through the Wisconsin Safe and Healthy Schools (WISH) Center.

Gay Straight Alliances

Gay Straight Alliances (GSA) are student-led groups which may include a combination of Lesbian, Gay, Bi-sexual, Transgender or Questioning (LGBTQ) students and their allies. Groups work to helping members and non-members all feel connected to the home school and in so doing improve school climate. Studies have shown that schools that LGBTQ students and their allies who have a GSA in their schools are more likely to feel safe in school than their peers (76% compared to 69%).³ Resources on starting a GSA can be found on the WI DPI website.

Suicide Prevention Training

There are a variety of laws that pertain to youth suicide prevention in Wisconsin. One law requires Wisconsin schools to educate students about suicide prevention using a health curriculum. In response to this law, the WI DPI has developed a free curriculum for health education classes in grades 7-12. The DPI has also developed a suicide prevention training module for all school-based

adults to take in order that they can identify and assist students who may be suicidal. More information can be found on the DPI website.

Restorative Practices

Restorative Practices encourages accountability for student actions. In doing so, the victim of misbehavior is involved and listened to as a part of a healing process. The empathy skills of all students can be further developed. Effective implementation of Restorative Practices can also lead to fewer behavioral issues and an improved school climate.

Bullying Prevention

Bullying is an important issue for schools to address as it can negatively create further problems in combination with other areas of difficulty, such as mental health, suicide and alcohol and drug abuse. When schools enforce an effective anti-bullying program, school climate improves. A study published in 2018 by researchers at the Wisconsin Department of Public Instruction, UW-Madison, and UW-Whitewater found that students who were bullied non-physically remained three times as likely to report being unsafe at school compared to their non-bullied peers.⁴ This indicates that safety goes beyond the physical, and a school climate that is able to successfully address verbal and emotional bullying can improve the student perception of safety.

SCHOOL CLIMATE RESOURCES

- In 2015 DPI developed the *Wisconsin School Mental Health Framework*, which utilizes an Equitable Multi-level System of Support structure. The framework provides guidance to help schools and districts build a comprehensive school mental health system. This framework can be used to highlight the activities which contribute to positive school climate, improved school connectedness, and improved measures of school safety. <https://dpi.wi.gov/sspw/mental-health/framework>
- Wisconsin DPI and WISH resources
 - Culturally responsive practices: <https://dpi.wi.gov/families-students/programs-initiatives/responsive>
 - Positive Behavioral Interventions and Supports: <https://dpi.wi.gov/rti/positive-behavioral-intervention-supports>
 - Trauma Sensitive Schools: <https://dpi.wi.gov/sspw/mental-health/trauma>
 - Social Emotional Learning: <https://dpi.wi.gov/sspw/mental-health/social-emotional-learning>
 - Mental Health Awareness and Wellness Education: <https://www.wishschools.org/resources/youth-mental-health-first-aid.cfm>
 - Gay Straight Alliances: <https://dpi.wi.gov/sspw/safe-schools/lgbt>
 - Suicide Prevention Training: <https://dpi.wi.gov/sspw/mental-health/youth-suicide-prevention/laws>
 - Restorative Practices: <https://www.wishschools.org/resources/restorativepractices.cfm>
 - Bullying Prevention: <https://dpi.wi.gov/sspw/safe-schools/bullying-prevention>
- United States Department of Education: <https://safesupportivelearning.ed.gov/>

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ROUTINE SECURITY PRACTICES

There are several factors that contribute to safe schools. One key factor is the universal implementation of routine-yet-carefully-observed security practices and protocols.

There are a number of easy-to-implement security practices that reduce the threat and impact of school violence. These include controlling access; screening visitors; challenging unknown persons; staff responsibilities; and classroom design. These relatively simple practices must be routine in the sense that they are performed so regularly that they are second nature. To accomplish this, staff, students, and administration must understand and “buy-in” to the practices, or shortcuts will decrease or eliminate the effectiveness of these basic security measures.

ACCESS CONTROL

Controlling access is a foundational concept of school security. One sign of its importance is that schools were required to implement controlled access and visual screening in order to receive DOJ school safety grant funds.

All school entrances should be locked during the school day. Anyone who wants to enter the school should be directed to a designated entrance where that person is screened before being admitted. After admission, the school should follow its visitor protocol.

Controlling access is a foundational concept of school security. All school entrances should be locked during the school day.

When school doors are opened to allow students to enter or leave, a designated staff member should be physically present at every opened entrance to visually screen everyone who could enter the school. “Visual screening” is a staff member stationed at each entrance who actively monitors ingress and egress through the unlocked exterior door(s). The staff member can clearly view everyone entering the school, change position or follow a person to further observe suspicious person(s) or behavior; challenge or stop an unknown or suspicious person; shut and lock the entrance to the school; give security directions to students, etc. The human element also provides the climate and culture we need in schools. A personal greeting of visitors, staff, and students sets the tone for putting people first. Effective visual screening requires staff to be physically present—remote monitoring or cameras cannot effectively accomplish all of these tasks.

Note that schools might not station a staff member at unlocked entrances outside of “regular school day” hours. For example, Cheerful High School unlocks its front doors at 7:30am to allow students to enter in preparation for the 7:50am beginning of the school day. The day ends at 3:15pm, with most students having exited the building by 3:30pm. Therefore, a staff member should be physically present to visually screen ingress/egress from 7:30am to 7:50am and from 3:15pm to 3:30pm. If school doors remain unlocked after 3:30pm for afterschool activities, a staff member is not necessarily required, as after-school activities have reduced numbers of students and are outside of the regular school day. Note that schools should not publish the times during which staff are performing visual monitoring. Additional visual screener resources, including physical and behavioral characteristics of suspicious persons, are located in Appendix D.

Some schools, particularly private and charter schools, may share a common entrance with a third party such as a religious center. If a school cannot exert control over its entrance, it must most carefully determine how to mitigate this security limitation.

VISITOR PROTOCOL

Schools should screen visitors to protect the safety and welfare of students and staff; ensure that visitors have a legitimate reason for their presence; prevent inappropriate access to children; and ensure the person isn’t prohibited from being on school grounds.

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Schools should identify and log all visitors to the school, and require that visitors identify themselves with photo identification – not just a name. Issue a unique pass that identifies the visitor to staff as an authorized visitor. Many schools use software products that compare the visitor's name to a list of prohibited persons barred from school properties (sex offenders, restraining order recipients, etc.). Some schools exchange the visitor's identification card, driver's license, or car keys for the school pass to ensure it is returned to the office.

The visitor pass should not be a generic adhesive label that can be purchased at any office supply store! Some schools print a unique ID card for each visitor specifying their name, authorized date, and photo. Consider the use of a high-visibility visitor pass, such as a fluorescent pink pass hanging from a similarly-colored lanyard, which increases visibility to distant staff members. In any case, all visitors should be required to prominently display the visitor pass at all times.

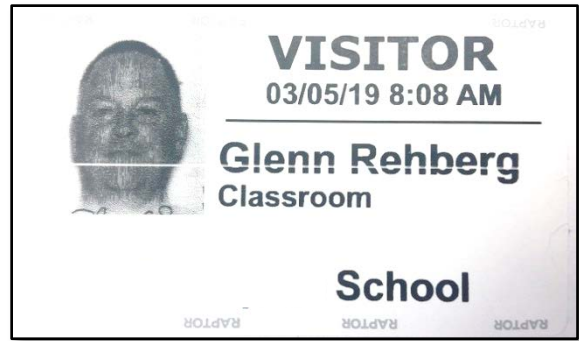


Figure 1: Example individualized visitor badge

LESSONS LEARNED FROM THE EXPERIENCE OF OTHERS – WHAT WOULD *You* Do?

Case Study #1: A man knocks at the side door of an elementary school door asking to be let in. Inexplicably, he can't seem to comprehend clear instructions to go to the office for screening and entry. He has been loudly knocking at the door for nearly ten minutes... [See Appendix A for additional information.]

RESPONSIBILITIES OF EVERY STAFF MEMBER

Access Control and Visitor Protocols are important elements of school safety. However, staff, students, and administrators should recognize that most school attackers are school-aged. In other words, perpetrators are often current or former students, or a person otherwise familiar with the school (such as the spouse of a staff member).

Security-conscious staff members have the largest positive impact on school safety. Conversely, a single staff member who fails to follow best practices can leave a gap that can be recognized and exploited by a determined individual. Fortunately, it's possible to implement everyday security practices that help prevent and mitigate acts of mass violence.

Thus, all staff members play key parts in keeping the school safe, regardless of job title or years of experience. All staff members should understand their role and importance in performing these school security tasks.

Safety Reporting

Students are often aware of who may present a threat to school safety. All staff members should be open to receiving reports of concerning behavior they may receive from students. Consistent with the importance of school culture, students are more likely to report their concerns when they know their report will be taken seriously, the reporter has a positive relationship with a staff member, and the reporter knows the staff member will follow-up on the information.

Staff should develop positive trusting relationships with students to increase the likelihood that they will report concerning behavior. Any staff member who receives information regarding a possible threat should notify the School Safety Intervention Team, which should trigger a threat assessment. Any staff member with information suggesting an imminent, credible threat bears individual responsibility for contacting law enforcement.⁵ School policy cannot prohibit a staff member from calling 911 to report the concern.

Challenging Visitors

When any staff member encounters an adult not displaying required identification, the staff member should be required to “challenge” that individual’s presence and immediately and insistently guide the unknown person to the front office for identification and/or removal from the facility. This can be done in a non-confrontational manner but should be rigorously required of all staff. For example, a staff member walking down the hallway sees a woman walking towards her who is not displaying the required identification. The staff member should pause their previous task and instead determine whether this person is a threat to the school and how the person came to be in the hallway.

An appropriate challenge could look like this: *“Hello, I’m Sara Jones, a teacher here [extending hand and smiling pleasantly]. Have you checked in at the office?”* The unknown person might display the previously-unseen visitor ID, at which point Sara might say, *“Thanks, I appreciate that you have it. Do you need a lanyard for it? We really need every visitor to display their ID.”* After the ID has been properly affixed, *“Who can I help you find?”*, and then Sara can guide the visitor to their destination.

If the person doesn’t have an ID, Sara can say, *“Oh, I’ll take you to the office where you can check-in and get your ID.”* Sara should insist – pleasantly at first – on escorting the person to the office. It would be utterly inappropriate to simply direct the person to the office by pointing out its location and then leave the unknown person alone in the school. Upon arrival at the office, Sara should take the unknown person directly to the person tasked with screening visitors and inform the screener where the person was found. The screener should investigate how the person was able to enter the school undetected and report that finding to administration.

A person who tries to avoid being taken to the office should be regarded with strong suspicion. Staff must not succumb to attempts to circumvent these requirements – and administration should support staff efforts to ensure all visitors are authorized and screened.

If the unknown person makes the staff member uncomfortable, whether due to behavior, mental status, or other factors, the staff member should “trust their gut,” retreat, and immediately summon assistance, including law enforcement if appropriate. If the person is believed to be dangerous, the staff member should put the school into lockdown (discussed later).

Initiating Standard Response Protocols

Staff responses in the first 30 seconds of a crisis often determine the severity and outcome. Time is a precious commodity in an emergency, and if an appropriate supervisor is not immediately available to decide upon a course of action, that supervisor should have trained and entrusted his or her subordinates with the functional authority to act in their stead.

Put more plainly, schools should train, authorize, and empower staff to initiate any Standard Response Protocol (SRP, p. 47) without requiring the approval of the school office, principal, or administrator. For example, a teacher who sees a person approaching the school with a gun should be able to activate the school’s public address system, announce “Lockdown – locks, lights, out of sight – lockdown – locks, lights, out of sight – a man wearing a camouflage coat is carrying a rifle on the playground.” Clearly the school office personnel, principal, and administrators have important crisis responsibilities—but delegating authority to initiate SRP can save time and lives.

STUDENT SUPERVISOR RESPONSIBILITIES

Staff members charged with directly supervising students – whether teachers, playground supervisors, lunch monitors, etc. – play a key role in school security.

Exterior Student Supervision

Playground and bus supervisors should wear high-visibility vests when performing these outdoor duties. This serves a similar purpose to the high-conspicuity practices often used by law enforcement and security agencies, such as cruise lights (dim steady-on blue lights on police car lightbars), flashing amber lights on security vehicles, and use of high-visibility outerwear at large events. The high-visibility vest makes it obvious to everyone in the area that the school is actively monitoring the event. In addition, in a crisis the staff member can be immediately located, and the “uniform” lends a modicum of extra authority to their directives.

In most outdoor supervision locations staff members should be equipped with two-way radios and cell phones. Radios have several benefits over cell phones. Radios allow instant communication to multiple people simultaneously, instead of having to dial individuals one-by-one. Radios are operated by pressing a large single button, not precise finger movements that can be difficult to perform in a crisis. Radios provide other staff members with instant situational awareness of what is happening, instead of having to wait to be notified (or not being notified at all). Still, cell phones are also useful, especially for calling 911 in the event of a crisis.

General Supervision

Staff members assigned to monitor large groups of students must understand the importance of their role. First, these should recognize that congregated areas are a “target-rich” environment attractive to school attackers. Furthermore, many recent school attacks have occurred during times of large-group monitoring, such as before school, after school, or during lunch periods.⁶ Staff members should be alert to unusual packages or signs that any individual is attempting to conceal unusual items. For example, the Columbine murderers concealed large 20-lb propane cylinders in duffel bags in the lunch area. The Parkland murderer concealed his large weapon in a guitar case. While large duffel bags and guitar cases are predictably present in schools, they are potential indicators when combined with other clues attentive staff may detect. Be alert to possible signs of concealing prohibited items on a person, shown in Appendix D.

TEACHER RESPONSIBILITIES

Teachers are key leaders, role models, and shepherds in crises. As such, they should thoroughly understand their security role.

One of the recommendations of the Sandy Hook Advisory Commission is to keep classroom doors closed and locked while class is in session.⁷ During an emergency the teacher may have only a few seconds – or no time at all – to lock the classroom door. There may not be time to locate a key on the other side of the room, insert it into the lock, turn and then remove the key, and then shut the door. While such tasks might seem quick and simple, they can become quite difficult in the midst of an “adrenaline dump” (a biological “fight, flight, or freeze” response – it increases strength but significantly reduces dexterity and makes hands shake). In the event of an emergency, no time need be wasted securing an already closed-and-locked door.

Some teachers are hesitant to adopt this practice, believing it will be inconvenient when students need to enter the classroom. While this may be so, like other classroom procedures it becomes second nature with practice – and it ensures that only *permitted* students can enter the classroom. Still, a less-desirable alternative is to leave the classroom door continuously locked, but standing open. In the event of an emergency the locked door can simply be pushed shut—no time is needed to lock it. This is easy to implement, as the teacher merely re-locks the door after opening it at the beginning of the day. This routine precaution can have a huge safety benefit.

Classrooms should also be locked when empty. In brief, bad things don't happen in empty classrooms, and locked classrooms keep bad actors out.

OFFICE STAFF RESPONSIBILITIES

Office staff work in the “command center” of the school and play a key role in school security. As such, there are special preparations and considerations inherent in these positions.

First, the location of the office should be immediately and clearly apparent to any school visitors. As mentioned elsewhere in this *Framework*, signs at each door should direct all visitors to the school office entrance.

Office staff must thoroughly understand the school’s security plan, but never reveal information on crisis procedures to inquisitive persons. Refer any questions regarding security policies to administrators. Because office staff are the school’s first point of contact, ensure they have immediate access to the bomb threat and harassing phone call checklists for when these calls are received.

Video monitors displaying security camera feeds should be readily observable by office staff. Request that cameras are of sufficient resolution and coverage that staff can see anything being carried by subjects requesting to enter the school. Consider installation of panic button(s) at the front counter to quickly summon assistance.

Enforce visitor requirements and protocols and keep visitor passes out of reach of visitors. Other school valuables should be kept off the front desk and out of reach of unauthorized persons.

Pre-plan where office staff will go during a crisis. Ideally this “safe room” would not be visible from the entrance, be easily secured, have live security camera monitors, and have cellular, landline, public address, and computer communication abilities.

CUSTODIAL STAFF RESPONSIBILITIES

Custodians are key players in school safety. Custodians are everywhere in a school, and at all times of day. They have huge opportunities to see or hear concerning behavior, observe suspicious persons, find objects of concern, and challenge suspicious persons.

In addition to their “eyes and ears,” custodians can enhance school safety by ensuring key school security practices are followed. To eliminate hiding places for contraband or intruders, ensure closets, storage rooms, utility rooms, and other work areas are always locked. This should also ensure that hazardous substances, such as gasoline, cleaning chemicals, etc., are locked away. Additionally, doors should not be propped open—especially exterior doors.

Finally, never discount a custodian’s ability to be a student’s “trusted adult.”

STUDENT RESPONSIBILITIES

Students must also understand and accept the purpose of safety initiatives. Without the proper buy-in, students may prop exterior doors open, politely let visitors in the back door when someone knocks, or fail to report concerning behavior.

Safety Reporting

Report safety concerns. School attacks are very rarely impulsive—nearly all (93%) of attackers engage in concerning behavior prior to the incident.⁸ While a person is planning an act of violence he/she very frequently “leaks” his/her intentions. Attackers often write, talk, or post about their intent, and often exhibit common concerning behaviors. 85% of school shootings are perpetrated by 13 to 18-year-olds. 81% of the time *someone else knew of the perpetrator’s plans* prior to the incident. 59% of the time *more than one person knew!* Students must accept that a fellow student who exhibits warning signs or talks about conducting

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such an act is actually a potential threat that should be reported. Concerning behavior should not be met with a, “That’s just Bob” response.

PARENT RESPONSIBILITIES

Parents are key contributors to the safety of their children and their school, through their actions at home and at school. There are several areas of which parents should be conscious in order to maximize their safety impact.

First, establish positive family dynamics at home. Be actively involved and aware of your child’s activities. Know his friends and interests. Monitor all your child’s social media accounts. A child who “rules the roost”—even pressuring parents into giving the child inappropriate amounts of privacy, or unlimited internet or television access—has an elevated risk of committing violence.

Hold your child accountable for his behavior. Parents who protect their child from natural consequences, even in the face of serious or pathological behavior, elevate the risk of the child committing acts of violence.

Keep firearms and ammunition safely locked up and ensure only you have access. Permitting unsecured or unsupervised access to weapons can provide the means to carry out a violent threat, and can even be a criminal offense.⁹

Finally, know and follow school safety policies and procedures. Adhere to the school’s visitor protocol and require others to do so as well. For example, do not hold doors open to allow people to bypass the school’s screening procedure. Such shortcuts have allowed gunmen and traumatic visitors into schools.¹⁰ Additionally, subscribe to the school’s emergency notification system and keep your family’s emergency contact information up-to-date. In the event of an emergency, this will allow the school to supply information about the school, parent-student reunification locations, etc.

When Your School Has a Crisis

Follow the instructions provided through your school’s emergency notification system. Because schools need to account for their students, in an actual crisis the school may transport students off the crisis site to a parent-student reunification site. This allows for an orderly return of students to an authorized parent or guardian.

SCHOOL LEADERSHIP RESPONSIBILITIES

School administrators serve a critical role in school safety. Proactive leadership creates opportunity for safe schools. Such proactive leadership is clearly visible at a school where the principal was concerned about the risk of staff members accidentally backing over students in the parking lot. She cajoled, persuaded, and eventually required staff members to back into the parking stalls before students arrived. This ensured that when staff members left, they drove forward out of the parking stall, with clear visibility in their direction of travel. Staff continued this practice even after the much-loved principal retired.¹¹

Establish and publish school rules. In order for schools to enforce school rules and have the ability to act when threats are made, parents and students must be informed of the school rules. Any questions or arguments regarding the response to a threat or rules violations can be answered by the school handbook.

Provide visionary leadership in student safety and security.

- Educate staff on school safety principles, policies, and procedures. It’s critical that every staff member knows that leadership sincerely and unequivocally believe in the importance and purpose of school safety measures. Staff members who don’t understand the

“The one common thread [in school safety lawsuits] is that the allegations are focused on the failure of school personnel who failed to follow [district] procedures,” Trump says. “It’s not about the failures of security equipment or hardware.” Ken Trump, President of National School Safety and Security Services, [American School Board Journal](#), August 2017.

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purpose and benefit of school policies, and/or *don't believe that these policies are important to school leadership*, are much less likely to follow proper procedures.

- Search out areas where staff may unintentionally or unknowingly short-circuit proper safety procedures.
- Schedule professional development sessions focused on school safety, with follow-up refresher training and drills. These should be further supplemented with brief "what-if" refresher discussions at regular staff meetings.¹² Administrators should document the school's safety training, including the dates, content, time spent, and attendance.

After staff and students understand the purpose and benefits of school safety policies, leaders must ensure that everyone follows the procedures. Administrators cannot shirk their responsibility and ignore failures to adhere to safety protocols. Do not permit anyone to shortcut safety practices and increase your school's exposure.

Staff members must accept their responsibility for the safety and welfare of children put under their charge. As part of that responsibility, school leadership should demand that all staff follow simple processes that contribute to school safety.

ROUTINE SAFETY PRACTICE RESOURCES

LESSONS LEARNED FROM THE EXPERIENCE OF OTHERS – WHAT WOULD YOU DO?

Case Study #2: "Bob," a student in your alternative high school, became upset with another student and threatened to stab him. Bob backed up this threat by throwing a sharp kitchen knife across the lunchroom at the student, where the knife ricocheted off the wall and nearly struck yet another student. Bob's counselor did not call the police to report the threat (and act) of school violence, and declined to even perform a Violence Risk Assessment, stating neither of these were required because Bob has an Individualized Education Plan (IEP). How would you correct the counselor's understanding of their responsibilities regarding school safety?

- *Final Report of the Sandy Hook Advisory Commission*, March 6, 2015, http://www.shac.ct.gov/SHAC_Final_Report_3-6-2015.pdf
- *Sandy Hook Advisory Commission Interim Report of Findings*, March 18, 2013, http://www.governor.ct.gov/malloy/lib/malloy/SHAC_Interim_Report_2013.03.18.pdf
- Additional teacher suggestions: <https://hayesschoolsafetysecurity.com/2017/02/05/classroom-safety-security-controls/>
- Additional office staff suggestions: <https://hayesschoolsafetysecurity.com/2017/02/03/school-security-main-office-personnel-are-your-first-line-of-defense/>

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SECURITY ASSESSMENTS

The Wisconsin School Safety Coordinators Association provided the information below to assist schools in understanding the importance of formal school security assessments.

Wisconsin Statute § 118.07(4)(b) calls upon public and private organizations to provide the safest, most secure environments for their students, staff, and visitors by identifying, alleviating and preventing risks, threats, and hazards. This can be done by conducting an on-site safety assessment of each school building, site, and facility that is regularly occupied by pupils. Per that statute, assessments are to be completed in consultation with local law enforcement before creating or updating school safety plans.

A comprehensive school security assessment informs and guides the creation or revision of school safety plans, and ensures that plans and subsequent actions align to the five critical hazard areas as identified in statute: prevention, protection, mitigation, response, and recovery.

2017 Wisconsin Act 143 tasked the Office of School Safety with creating model practices for school safety in conjunction with DPI and in consultation with the Wisconsin School Safety Coordinators Association (WSSCA) and the Wisconsin Safe and Healthy Schools Training and Technical Assistance Center. Since 2013 the WSSCA has provided school security assessments to public and private schools across the state.

THE SCHOOL SECURITY ASSESSMENT PROTOCOL

Ideally the school security assessment should be done by an outside observer rather than a member of the school staff. An outside observer can more easily bring unbiased objectivity to the process, which helps prevent inaccurate assumptions and automatic acceptance of past practices. Larger districts may have staff from other buildings do the assessment. Small districts might partner with other small districts to perform assessments for each other or on a round-robin basis. Another option is to hire an outside agency such as WSSCA to do the assessment.

WSSCA's School Security Assessment Protocol incorporates and adapts concept, principles, and ideas from the National Clearinghouse for Educational Facilities, Safe Schools Facilities Checklist, the Texas School Safety Center, School District Facility safety and security audits, Wisconsin Statute 118.07, Wisconsin Department of Justice Office of School Safety, and The Wisconsin School Safety Coordinators Association. It includes interviews of key staff, reviews of existing documents, and a comprehensive walk-through of all buildings and grounds. It examines the five pillars of emergency management (Prevention, Preparation, Response, Recovery, and Mitigation) in sixteen major areas under three main categories of Human Action, Technology/Communications, and Infrastructure.

THE ASSESSMENT: HUMAN ACTION

Human Action is the first and most comprehensive element of the school security audit. It has the most potential for ensuring a safe and secure environment—Human Action is the most cost-effective, responsive, and agile tool we have to make and keep our schools safe and secure.

Climate and Culture

School climate is the intuitive, almost palpable, sense of safety and belonging that people experience on site. It can be described as warm or cool, safe or unsafe. School culture refers to the way teachers and other staff members work together and the set of beliefs, values, and assumptions they share.

Climate and culture should have most assessment time spent on interviews with key staff along with direct observation. The assessment should look for evidence of school pride and ownership, staff visibility, staff interactions with students, student engagement and support beyond the regular classroom, school expectations for behavior, and specific programs to address bullying.

Emergency Operations Plan (School Safety Plans)

An emergency operations plan (EOP) is a course of action developed to mitigate the damage of events that could endanger an organization's ability to function. EOPs should include measures that provide for the safety of personnel, property, and facilities.

- Approval and support. Has the plan been adopted by the School Board? Is there evidence of law enforcement participation in developing and/or approving the plan?
- Is the plan up-to-date? When was the last revision? Are the dates of revision documented on the plan?
- Partners and MOUs. Who are the local partner agencies that should be included in the plan? Are there current memoranda of understanding with these partners?
- Training and communication. Is there yearly refresher training in key elements of the plan? Who receives the training?
- Monitoring fidelity. Are violations of security protocols addressed through the supervision process?
- Specific elements including a specific student security policy. Does a specific board policy addressing student security exist?

WSSCA offers an EOP Template which can be found on the WSSCA¹³ and DOJ websites, free of charge to Wisconsin schools.

Preparation and Training

Preparation and training are the processes of planning and determining what actions will be taken in an emergency and determining who will respond. The two areas are tightly aligned and, as with other areas in the total assessment, there is some overlap.

- Possession of plan documents. Are they distributed appropriately?
- Ease of use and authorization for use. Simply stated, is it user-friendly?
- Means of real-time communication such as PA access and hand-held radios.
- Multiple-level response options. Run-Hide-Fight? ALICE? CRASE?
- Training scope. Who has received training? Have students been adequately trained?

Teams and Roles

Roles and duties should be assigned within a management system to enable effective and efficient incident management. These should address the integration of facilities, equipment, personnel, procedures, and communications in an organizational structure.

- Existence of a dedicated team. Does the district and each school have a designated point person for safety and security?
- Clarity of roles. NIMS/ICS training is highly recommended.
- Specific designations for schools. Are the individual needs and characteristics of each site addressed specifically?

Drills

The Wisconsin Statute for Health and Safety requirements [Wis. Stat. § 118.07(2)(a)] is clear on the expectations of schools for fire, evacuation/tornado, and safety drills. Security assessments look for understanding of and compliance with regulations:

- Documentation. Are drills documented thoroughly and is the data kept on file for seven years?
- Have schools conducted rally point and evacuation site drills?
- Performance testing. How have schools tested their unauthorized visitor/intruder protocols? WSSCA does not advise conducting unannounced mock school shooter drills.

Visitors and Deliveries

Wisconsin Statute § 120.13(35)(a) states, "A school board may adopt rules applicable to persons who enter or remain in a building operated by the school board, including requirements that such persons identify themselves and sign in when entering or remaining in the building or any specified portion of the building and designating time periods during which such persons may enter or remain in the building or any portion of the building."

- Visitor sign-in process. Is there a process? Is it followed?
- Type and location of IDs. Are they accessible to anyone or issued individually?
- Deliveries and packages. Is there a central location for receiving and logging deliveries?
- Vendors and Contractors. Are they vetted? Must they sign in?

Threat and Risk Assessment

The primary purpose of a threat assessment is to prevent targeted violence. Implementation of a threat assessment process allows schools to build capacity for violence-reduction strategies that create healthy cultures of safety, respect, and emotional support for students and staff.

All schools should have a School Safety Intervention Team (SSIT) that employs a specific, systematic, and rehearsed practice for assessing threats. The SSIT should comply with the Family Educational Rights and Privacy Act (FERPA), Wisconsin Statutes §118.125(2), § 48.981(2), and § 175.32 [confidentiality, mandatory reporting of child abuse, and mandatory reporting of threats of school violence].

- Does the District and each site have a designated point person for school security?
- Has each school established a School Safety Intervention Team? Has the SSIT been trained, and does it meet regularly?
- Does each SSIT include a mental health specialist (school counselor, social worker, and/or psychologist), law enforcement officer, and administrator?

THE ASSESSMENT: TECHNOLOGY AND COMMUNICATION

A school security assessment should examine the hardware, software, and devices that assist in monitoring and recording access, movement, and data, as well as the varied means used to communicate in real time across distances.

Cameras, phones, radios, and visitor management systems must be paired with human action to be effective, and the assessment should examine this in addition to the mere existence of technology hardware.

Communications

Accurate real-time information is arguably the most important element in mitigating and responding to a crisis or critical incident. Two-way communication between people and places in a school can be accomplished in multiple ways, and the security assessment should consider multiple means, locations, and methods.

- Two-way radios and PA systems. What type of radios are made available? Who is issued radios? Are they professional multi-channel quality? What is the PA coverage inside and outside the building?
- VoIP. If it is installed, are all staff trained and empowered to utilize the Voice-over Internet Protocol phones?
- Procedures. Are all staff trained in using all available means of real-time communication? Are they trained and empowered to contact emergency services (911) at their own judgment?
- Is plain language used to communicate in an emergency, or are [undesirable] codes still being used?

Monitoring and Surveillance

Monitoring is a general term that refers to the systematic, continual, and active or passive observation of persons, places, things, or processes. Surveillance is the targeted monitoring of activities for specific evidence of wrongdoing. Surveillance focuses on individuals, buildings and properties, or vehicles deemed suspicious on the basis of credible information.

- Does the location and type(s) of cameras cover all essential and critical areas?
- Who is trained and has access to the camera system? Are cameras monitored during the school day?
- How long is recorded video data maintained? Is it maintained for at least 30 days?
- Is there a security alarm system connected to a monitoring service?
- Are staff assigned to monitor hallways, stairwells, interior and exterior areas of the campus?

Keys and IDs

Keys, IDs, and their control systems are one of the most common holes in school security efforts. A security assessment should address several points regarding key and ID possession, use, and procedures.

- Does the School and District utilize a master control system for issuing and retrieving all keys, fobs, or electronic access devices?
- Are keys collected and audited yearly? Does the District require and enforce consistent, universal display of staff IDs?

THE ASSESSMENT: INFRASTRUCTURE

Because schools may not have been designed to incorporate security best practices, it's critical that assessments inspect structures and practices both inside and outside the school. While capital projects to enhance security infrastructure generally come at high cost, often an assessment will find that human actions in concert with existing infrastructure can significantly improve school security.

Building Access

Closely tied to the Visitor Management Protocols, this is, without question, a first line of defense. As stated in the Sandy Hook Commission Report, "We must redouble our efforts to restrict access to school buildings." While it is true that we want schools to be welcoming and warm, we balance that with the need to maintain a safe and secure campus. An assessment can show that these needs are not incompatible or impossible to achieve, but will stress that we must control access to our schools and ultimately, students.

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- Is there a single point of public entry during the school day? Are there secured vestibules?
- Are designated staff assigned to monitor and visually screen entry and exit anytime doors are unlocked during the regular school day?
- Are there after-hours procedures for building use, including sign-in and sign-out for staff presence in the building, outside of general-purpose hours?

General Interior

The interior assessment will include classrooms, halls, offices, utility areas, gymnasiums, and any specialty areas of the school. There is a definite correlation between the upkeep and appearance of a school and the culture and climate of the school.

- Can classroom doors be locked from inside the classroom?
- Are classroom doors locked during instruction and whenever unoccupied?
- Are electrical panels, utility closets and rooms, custodial closets, and food storage areas secured?

General Exterior

Statute requires that on-site assessments shall include playgrounds, athletic facilities or fields, and any other property that is regularly occupied by pupils. A school security assessment should follow the principles of Crime Prevention Through Environmental Design (CPTED) by evaluating the school's natural surveillance options, maintenance of buildings and grounds, access control to both property and facility, and clear establishment of boundaries/territoriality.

- Are interior and exterior doors numbered? Are windows numbered?
- Is roof access restricted? Are fences present to mark boundaries and/or prevent access?
- Do signs clearly indicate where visitors should go, and restrict access to unauthorized persons?
- Is equipment that is stored outside secured?
- Are trees and shrubbery appropriately located and maintained?¹⁴
- Natural and man-made hazards on or near campus.

CONCLUSION

An effective and comprehensive school security assessment gives school leaders a thorough report of the assessor's observations, findings, and recommendations. The report should detail the strengths and vulnerabilities, along with the rationale supporting the report's conclusions. A report may offer ideas for action that a district could take to address vulnerabilities, and these considerations may be separated as short-term or long-term depending on costs and dispositions that are required for making suggested changes.

Security Assessments contributed by Barbara A. Dorff, PSP, and Edward L. Dorff, PSP, Executive Director of WSSCA.

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- Timm, Paul. *School Security: How to Build and Strengthen a School Safety Program*. Waltham, MA: Elsevier Inc, 2015

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- AIR California School Safety Resource Toolkit - <https://www.air.org/sites/default/files/downloads/report/California-School-Safety-Toolkit-First%20Edition-January-2017.pdf>
- Best Practice Considerations for Schools in Active Shooter and Other Armed Assailant Drills: <https://www.alicetraining.com/resources/item/8928/>
- EOP Interactive Tools: <https://rems.ed.gov/eopinteractivetools.aspx>
- Final Report of the Sandy Hook Commission: http://www.shac.ct.gov/SHAC_Final_Report_3-6-2015.pdf
- Guide for Developing High Quality School Emergency Operations Plans: https://rems.ed.gov/docs/rems_k-12_guide_508.pdf
- Minnesota Comprehensive School Safety Guide: <https://dps.mn.gov/divisions/hsem/mn-school-safety-center/Pages/planning.aspx>
- Wisconsin School Safety Coordinators Association: <http://wssca.wildapricot.org/>

PHYSICAL SECURITY IMPROVEMENTS

While an informed, trained, and practiced staff is the largest influence on school safety, a comprehensive approach demands that schools examine physical safety improvements. Physical security improvements cannot prevent school violence. But intelligently-designed infrastructure, *when combined with a capable staff*, can reduce casualties and buy time for police intervention.

Some of these security improvements are quite expensive, while others merely require rearranging the school's existing equipment. It is important to understand the purpose and benefit of each improvement so it can be examined in the context of a comprehensive schoolwide safety program.

MAIN ENTRANCE DESIGN

As previously discussed under "Access Control," visitors should be directed to a single main entrance where they can be screened prior to entry. Schools should accomplish this by prominently posting signs directing visitors to the designated entrance. These signs reduce visitor confusion and support efforts to identify people circumventing school security procedures.

All school doors should be locked during the school day, including the main entrance. When a visitor arrives they should be visually screened before being allowed past a locked door. Persons carrying anything of a suspicious nature should be asked their business prior to being admitted.

Ideally when the visitor is admitted, they would enter the school office for screening without opportunity to access the rest of the school. In other words, the visitor would have to enter the school's administrative office where they would be subjected to the visitor protocol before proceeding further. In an ideal design the school staff would remotely unlock the door leading to the school for screened visitors, while unscreened visitors would encounter a locked door when they tried to just run past office staff into the school.

EXTERIOR DOORS AND WINDOWS

Exterior doors should be solidly constructed and fit tightly to the frame. Doors equipped with "panic bars" should have pick plates to prevent anyone outside from opening the door. Teachers should have the required key or fob to re-enter exterior doors following an evacuation (during a fire drill or an act of violence, staff should be able to perform a "reverse evacuation" into the school if necessary).

Door alarms can provide an audible and/or electronic signal when an exterior door is opened or propped open. Cameras can monitor the status of emergency exit doors and discourage staff or students from admitting unauthorized persons.

Shatter-resistant security film may be installed over sidelites (small windows immediately adjacent to doors), entry door glass, and/or non-classroom exterior windows on the ground floor. This film can hold broken glass together within its frame, impeding an intruder's attempt to enter through a broken window (such as Sandy Hook), or to reach in to unlock a door. This film is not bulletproof, but it can delay forced entry attempts and provide additional time.

Ground-floor exterior classroom windows should not have shatter-resistant film applied. Classroom windows are a potential escape route, which is significantly limited if shatter-resistant film is in place. Identify which windows are visible from the classroom door and consider how windows out of that sightline could be used as an escape route. Ensure potential evacuation windows can be opened (i.e. aren't painted shut or otherwise inoperable).

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Exterior windows should display the room number and, ideally, compass direction of the exterior wall. For example, west-facing room #22 should be labeled "22W" so emergency responders can immediately identify where assistance is needed.

Exterior doors should be numbered on both the inside and outside for a similar reason. The interior number allows people inside the building to quickly identify the door through which assistance is desired, while the exterior number is used by emergency responders. All exterior doors should also have signs directing visitors to report to the main entrance. With such clear directives, anyone trying to circumvent the school's access policy should be regarded with concern.

CLASSROOM DESIGN

Teachers should incorporate simple security concepts into their classroom design. These suggestions can pay big dividends in the event of a crisis.

Classroom Doors

Classroom doors should be solidly constructed and be equipped with a lock. Ideally the door should be able to be locked from within the classroom. However, the simple practice of re-locking the door after it is first opened at the beginning of the school day can mitigate locks that must be locked from the outside of the door.

As previously mentioned, doors should be locked and closed while class is in session. Failing that, doors should be locked even while open, allowing the door to be quickly closed in the event of a crisis. Do not use any device that prevents the latch of a locked door from functioning. In the event of a crisis the device is more difficult to operate than simply closing an already-locked door.

Many classroom doors are equipped with a glass panel. People have questioned whether an attacker might break the glass and then reach in to unlock the door. If an attacker were to reach through a broken window to unlock the door, such action could give the room's occupants effective options to thwart such an attempt. Consult your local law enforcement agency's tactical instructor for effective countermeasures.

Carefully consider whether to cover the window. Covering the window may prevent an attacker from seeing whether anyone is in the room, but it prevents responding law enforcement officers from quickly scanning the room for obvious problems. Covering the window is preferable if there is no location in the room out of view of the window. Leaving windows uncovered may have additional benefits outside the purview of this *Framework*, such as reducing the likelihood of accusations of inappropriate conduct by teachers.

If a school elects to cover windows, consider leaving the top inch of the window clear. A perpetrator will not be able to see inside the classroom, but the small open area provides an avenue for a law enforcement officer to display her badge or for the principal to display his identification, when they are releasing classrooms from lockdown.

Barricading and Commercial Barricade Devices

In the event of school violence, staff may wish to barricade their door to further ensure an attacker cannot enter a room. Appropriate barricade materials would delay entry and, ideally, serve as "cover" (something that can stop bullets). Examples of appropriate objects might include filing cabinets, heavy wooden desks, tables, etc. Staff members should identify such appropriate heavy-but-movable objects, and then use a fluorescent sticker to number the object(s) in the order in which they should be moved into position for maximum effectiveness.

Commercial barricade devices are also manufactured to secure a classroom door against forced entry. At first glance commercial barricade devices might appear to have great benefit, but when closely examined they present significant issues and are not recommended.

First, there is no known incident where an attacker breached a locked classroom door.¹⁵ It didn't happen at Virginia Tech, Sandy Hook, Columbine, Parkland, or any other known school shooting. As previously discussed in *Classroom Access*, teachers should keep their classroom door closed and locked. Even if the door is kept open during class, the already-locked door can be shut much faster than any commercial barricade device can be applied. Furthermore, many commercial barricade devices require the operator to be positioned behind the door while the device is applied, leaving the operator susceptible to being shot through the door. On the other hand, pre-positioned "cover" objects such as filing cabinets may be pushed into position from the side of the door, perhaps without exposing the user at all.

Second, no known barricade device is compliant with both the Americans with Disabilities Act (ADA) and Wisconsin building and fire codes. The most frequent violations include non-compliance with height requirements, range or number of motions required to disengage, and/or exterior access by first responders due to multiple and/or unique locking mechanisms. The Wisconsin Department of Safety and Professional Services has published a FAQ on this topic, excerpted below.¹⁶

While there are many innovative devices currently on the market for securing doors, if they operate independently of the typical door hardware and latch, they are likely not permitted by Wisconsin Building and Fire Codes. SPS 361.03(13) requires existing public buildings and places of employment to be maintained in compliance with the building code provisions that applied when the building was constructed or altered except when required by subsequent editions of the building code. The building code has a long history of consistent requirements for exit or exit access door hardware... The current Wisconsin Commercial Building Code which adopts the 2009 edition of the International Building Code requires the following in s. 1008.1.9.5, "The unlatching of any door or leaf shall not require more than one operation." and in s. 1008.1.9, "Except as specifically permitted by this section egress doors shall be readily openable from the egress side without the use of a key or special knowledge or effort."... There are many unintended consequences that might occur from barricading egress doors serving occupied rooms and therefore such devices are generally prohibited by Wisconsin Building and Fire Prevention Codes. There are code compliant door hardware solutions, such as a classroom security lockset, that will allow egress doors to be locked from the classroom side, while at the same time allowing egress through normal operation of the door hardware on the classroom side, which will automatically release the latch and any accompanying dead bolt in a single operation.

The National Fire Protection Association published similar guidance on the issue in January 2019, with the addition of examples of compliant door locks and fire alarm system guidance.¹⁷ Other national organizations, such as Safe and Sound Schools, also recommend against these devices.¹⁸

While barricade devices might be attractive at first glance, they have never proven beneficial and violate established safety standards. Perhaps even worse, they introduce a new possibility—that of an attacker using a school barricade device in a hostage situation. Commercial devices are very effective at preventing entry. When there's no provision for exterior unlocking, or a special tool or key is required, rapid law enforcement access can be difficult or impossible.

The possibility of barricade use by a hostage-taker is not as remote as might be wished. There are many well-known incidents of perpetrators taking hostages in schools, including a November 29, 2010 incident in Wisconsin.¹⁹ Perpetrators have previously barricaded doors to prevent law enforcement entry²⁰ and escape by the victims.²¹ Schools should avoid providing inadvertent assistance to an attacker.

Barricade devices can be harmful even in incidents less deadly than mass killings. Take, for instance, sexual assaults against staff and students. Some of these occur behind locked classroom doors, but the addition of a barricade device could delay intervention if the attack was discovered while in progress.²²

Commercial barricade devices are not recommended. Instead, teachers should utilize locked classroom doors, which have been shown to be effective and are accessible by emergency first responders.

Identify and Mark the Safe Zone

In many classroom layouts there will be a corner of the room that is not visible from the hallway when the door is closed and locked. This “safe zone”²³ should be delineated with an arrow on the wall at the edge of the zone, pointing towards the safe corner. Teachers should design their class layout so that the safe zone doesn’t contain the teacher’s desk, cabinets, or other large obstructions. This maximizes the space available for students to occupy when a lockdown occurs.

Space Adjacent to Door

To the extent possible, teachers should clear space adjacent to the door so the teacher and/or appropriately-aged student(s) can position themselves at that location (while still in the arc of the safe zone). This provides an area from which innocent defenders may immediately physically counter any attempt to breach the door by reaching in through a broken window. Historically, attackers do not spend much time trying to breach locked doors, as they know their time is extremely limited. In the past there have been cases where victims were shot through doors, so be certain that no one remains in the non-safe zone.

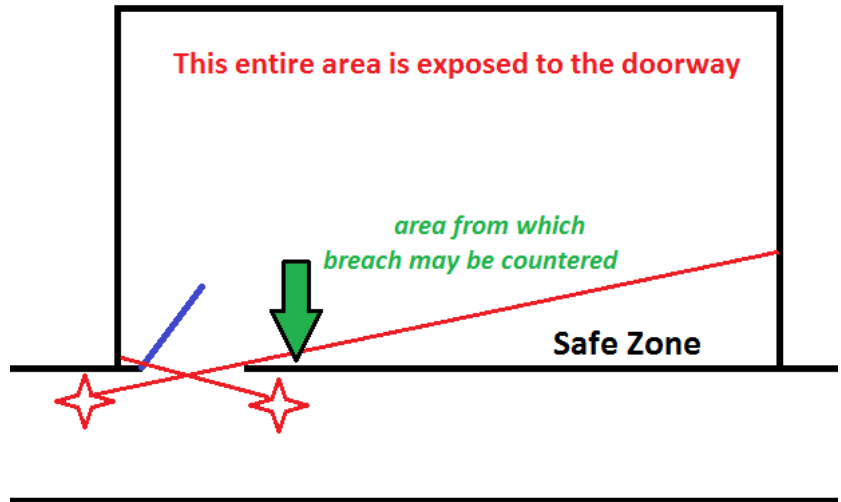


Figure 2: Classroom area potentially visible from hallway

CAMERAS

Security cameras serve a useful albeit limited role in enhancing school safety. Cameras can deter inappropriate, criminal, and violent behavior; assist in incident investigation; and provide situational awareness for school personnel who monitor live feeds. However, understand that cameras do not prevent violence. For example, both Columbine and Parkland High Schools had security cameras. In mass killing attacks, cameras only serve to document what happened.

There are several ways to maximize the deterrent effect of cameras. Prominently post signs stating that security cameras are in use. If a person cannot be continuously tasked with monitoring live camera feeds,²⁴ ensure that monitors are easily visible by multiple staff members. Consider placing a large monitor showing multiple or rotating feeds in common areas such as the cafeteria, office, etc. where the monitor highlights camera presence and is visible to many people.



Figure 3: Screenshot of Columbine HS security video

Ensure that staff can view live video feeds while using the public address system. This allows staff to “call out” actors and/or inform others in the school of what is happening. For example, placement of monitors in the school office “safe room” (see *Office*

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Staff Responsibilities) might allow staff to use the PA system to announce that the suspicious person causing lockdown is in the west hallway, second floor, moving towards the art room. If possible, this would maximize situational awareness, help thwart the perpetrator, and provide staff and students with actionable intelligence.

METAL DETECTORS

Metal detectors can serve a role in school security, but staff must define their purpose and understand their limitations.

Metal detectors may assist in finding weapons brought to school, deter students from bringing weapons to school, and increase the perceived safety of the school. On the other hand, metal detectors are expensive, and some people believe they make the school feel less welcoming. They could contribute to overconfidence, leading to less-alert staff. Schools using metal detectors must prevent weapons from being smuggled in via other routes. Finally, be aware that students congregated together waiting to pass through the detection site could themselves be an attractive target to an attacker.

Instead of routine daily screenings, some schools use randomized checks to promote a level of deterrence without some of the systemic challenges identified above. Schools that are considering the use of metal detectors should carefully evaluate the benefits, costs, and limitations of metal detector programs.

PHYSICAL SECURITY IMPROVEMENT RESOURCES

- Barricade devices
 - Wisconsin Department of Safety and Professional Services FAQ on door security or barricade devices: <https://dsps.wi.gov/Documents/Programs/CommercialBuildings/FAQSecurityLocksSchools.pdf>
 - <https://lockdontblock.org/resources/code-compliant-locks-vs-barricade-devices/>
 - <https://www.safeandsoundschools.org/2019/01/22/lets-open-the-conversation-about-door-safety/>
 - <https://www.nfpa.org/-/media/Files/Code-or-topic-fact-sheets/SchoolSafetyUpdate.ashx>
- Metal detectors
 - <https://www.campusafetymagazine.com/safety/best-practices-deploying-metal-detectors/>
 - <https://www.schoolsecurity.org/trends/school-metal-detectors/>

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LAW ENFORCEMENT, FIRE, AND EMS PARTNERSHIPS

Partnerships between schools and emergency response agencies will yield far greater results than anything an individual organization can achieve on its own. Schools without a law enforcement partnership cannot leverage the information, resources, and legal options available to officers. A law enforcement agency acting on its own cannot effectively assist and protect students and staff within a school. Neither schools nor law enforcement can effectively respond to critical incidents without a collaborative partnership with fire and emergency medical responders.

LE INFORMATION SHARING AND SITUATIONAL AWARENESS

Law enforcement can provide unique and significant assistance to schools. Two-way information sharing can significantly enhance both the security and learning environment within schools. Schools should share information regarding potential security issues with law enforcement. Similarly, law enforcement should work share relevant information regarding out-of-school family and behavioral issues with the school.

Mandatory Reporting

Wisconsin Statute § 175.32 makes school personnel mandatory reporters.

175.32 School violence (excerpted)

- (1) In this section:
 - (c) "School" means a public, private, or tribal elementary or secondary school.
- (2)
 - (a) Any person listed under s. 48.981 (2) (a) shall report as provided in sub. (3) if the person believes in good faith, based on a threat made by an individual seen in the course of professional duties regarding violence in or targeted at a school, that there is a serious and imminent threat to the health or safety of a student or school employee or the public.
- (3) A person required to report under sub. (2) shall immediately inform, by telephone or personally, a law enforcement agency of the facts and circumstances contributing to the belief that there is a serious and imminent threat to the health or safety of a student or school employee or the public.
- (4) Any person or institution participating in good faith in the making of a report under this section shall have immunity from any liability, civil or criminal, that results by reason of the action... For the purpose of any proceeding, civil or criminal, the good faith of any person reporting under this section shall be presumed.
- (5) Whoever intentionally violates this section by failure to report as required may be fined not more than \$1,000 or imprisoned not more than 6 months or both.

LE Information Sharing

A school resource officer (SRO) is in a unique position to share information relevant to school concerns. For example, the SRO may be aware of family interactions and arrests that happen outside the school day that can have significant impact on a student's behavior and performance in school. A student who just witnessed his father being arrested for domestic violence the night before may act out in school the following day -- and will certainly not perform up to his potential.

Some law enforcement agencies and schools have improved upon this basic level of information sharing, formalizing a system where the school is informed of any contacts with juveniles that occur outside

Some law enforcement agencies, such as the Kewaunee County Sheriff's Office, inform their schools when a student is present during an OWI arrest, traffic stop, domestic abuse arrest, death, or other potentially traumatic event.

school hours. This level of trust and partnership between school and law enforcement allows both agencies to guide and assist students for the maximum benefit of the agencies and even more importantly, the student. See Appendix E.

SCHOOL RESOURCE OFFICERS

The benefits of School Resource Officers (SRO) are widespread and varied. SROs can provide many services to schools including law education, informal counseling, information sharing, safety planning, and immediate police response to emergencies.

Specify the Relationship

The SRO's role should be defined within a Memorandum of Understanding (MOU) between the school and the law enforcement agency. Documenting expectations from the beginning ensures the partnership is implemented in the most effective way possible, and ensures all parties are aware of their roles and responsibilities within the relationship.²⁵ The MOU should clarify the role and authority of the SRO and authorize the SRO to function as a school official. It should also make clear distinctions between the handling of disciplinary and criminal matters. For example, the SRO shouldn't be engaged in student discipline, punishment, or classroom management for behaviors that are expected and "normal." Example MOUs are available on the DPI and US COPS websites.

Hiring and Training

Working with children within a school presents different challenges than typical law enforcement work, especially considering the developmental and legal differences from other law enforcement clients. As such, selection of SROs should be based on ability, interest, and talent, not merely seniority. The hiring process should include a school representative on the selection committee.

SROs should attend formal training on the duties, responsibilities, and authority of school-based law enforcement officers before being placed in a school. Appropriate training includes, as an example, the 40-hour course available from the National Association of School Resource Officers (NASRO). It should include juvenile information sharing and laws; threat assessment; adolescent development; mental health; drug awareness and substance abuse; school discipline and code of conduct; working with students with disabilities; problem solving; critical incidents; cultural sensitivity; and other related topics.²⁶ Additional training could include PBIS and school-based de-escalation, such as removing the audience for out-of-control students. Proper training will help the new SRO understand their role and identify potential pitfalls.

SROs are encouraged to wear their law enforcement uniform, and they should be armed while performing their assignments.

SRO Capabilities

School resource officers can deliver diverse services to schools. Generally SROs should not be involved in school disciplinary issues and all parties should understand that the SRO's role is not primarily that of enforcement. Spending significant time writing truancy, tobacco, and parking tickets may be a sign of SRO ineffectiveness. The SRO should strive to build trusting relationships and make students feel connected and supported; be a trusted adult that students can go to when they or others are in crisis; be a visible, established presence in the school; minimize tolerance for bullying; encourage nonviolent conflict resolution; and provide campus safety-related training.²⁷

The unique position of SROs combine some of the most valuable attributes of both school officials and law enforcement officers.

Legal Authority

SROs can combine the legal authority of both school officials and law enforcement officers. SROs have training and experience that can effectively assist schools in maintaining safe school environments, including through appropriate school-based interviews and searches.

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Schools have the right to develop a district policy regarding parental notification when their children are part of a school or law enforcement investigation. It is up to the school if they allow parents to be part of interviews for disciplinary infractions. However, it is up to law enforcement if they allow parents to be present when their child is being interviewed in a criminal investigation.²⁸ (Of course, in-custody interviews always require the person to be read their Miranda rights, and custodial juvenile interviews must be recorded.)

Another valuable attribute was affirmed by the US Supreme Court in *New Jersey v. T.L.O.*, which states a school administrator's ability to search a student and their belongings falls under the legal standard of reasonable suspicion rather than probable cause.²⁹ The Wisconsin Supreme Court confirmed an SRO's ability to assist principals in such efforts within the case of *In the Interest of Angelia D.B.*:³⁰

"Were we to conclude otherwise, our decision might serve to encourage teachers and school officials, who generally are untrained in proper pat down procedures or in neutralizing dangerous weapons, to conduct a search of a student suspected of carrying a dangerous weapon on school grounds without the assistance of a school liaison officer or other law enforcement official..."

Teachers and school officials are trained to educate children and to provide a proper learning environment. Law enforcement officials, on the other hand, receive specialized training on how best to disarm individuals without subjecting themselves or others to danger. When faced with a potentially dangerous situation beyond their expertise and training, school officials must be allowed 'a certain degree of flexibility' to seek the assistance of trained law enforcement officials without losing the protections afforded by the reasonable grounds standard."

Security Assessments

SRO training includes an introduction to security assessments. The officer's law enforcement experience contributes to their ability to recognize existing security limitations and areas of future improvement within the school setting.

Threat Assessment Team participation

The SRO must be an integral part of the School Safety Intervention Team and should be involved in every threat assessment performed by that team. The SRO can access police and juvenile records otherwise unavailable to the school and may assist with and/or perform interviews of out-of-school situations such as work, family, and social media accounts. Furthermore, if the threat assessment evolves to a potential criminal investigation, the SRO does not require permission from the parent or guardian to interview the student.

LAW ENFORCEMENT RESPONSE

Law enforcement agencies and schools are encouraged to discuss new ways to support school security efforts.

Law enforcement agencies should consider an emergency response to any unplanned school fire alarm, as an unplanned fire alarm could be an attempt to gather potential victims (see "Fire Alarms and Channeling" under *Fire Department Assistance* on the next page).

Schools and law enforcement agencies are encouraged to explore new and innovative ways to increase police presence on school grounds, particularly during non-classroom times. An examination of recent school attacks has shown that many of them occurred before school, after school, or during lunch periods.³¹ Increased squad or foot patrol during these times may serve to calm traffic in congested pedestrian zones as well as deter school violence. Perhaps patrol officers can occasionally visit students during lunch periods to build relationships. Note that neither of these ideas – nor other ideas that may be generated by schools or law enforcement agencies – require School Resource Officers!

Many school attacks occur before school, after school, or during lunch periods.

Maps

Referred to as “blueprints” in Act 143, schools are required to provide maps to the local law enforcement agency. These maps are invaluable when emergency responders are dispatched to a crisis situation, potentially cutting minutes from the time needed to arrive at the exact crisis location. Schools are urged to keep these maps up-to-date. The map should detail key emergency responder information:

- Each entrance, with the number of the entrance
- Each room number, along with a description if appropriate (i.e. “art room,” “gymnasium,” “front office,” “library,” etc.)
- Ideally, annually updated with the label of each classroom (i.e. “Ms. Smith, 1st grade”)

FIRE DEPARTMENT ASSISTANCE

Schools have a long history of compliance with fire safety requirements, including monthly unannounced fire drills under Wis. Stat. § 118.07(2). This long-standing requirement has made such drills a routine part of school safety. Although such drills are routine, schools should not overlook the value of such drills, as well as how their implementation interacts with school violence.

Fire Alarm Evacuation and Channeling

Every staff members’ ultimate concern is the safety of children in their charge. As such, they should be authorized and entrusted to deviate from the crisis plan when they encounter new, unforeseen circumstances that make such deviation desirable.

Schools generally have excellent fire notification and suppression systems. When a fire alarm sounds, staff should look and listen for signs of smoke or fire to attempt to confirm the validity of the fire alarm.

Staff should also look for signs of “channeling” – an attempt to gather potential victims in one congregated area. When a fire alarm activates, radio-equipped staff members who are not responsible for direct student supervision should immediately head to each side of the building. There, these staff members should look for any signs of suspicious activity, including atypical vehicles, loitering people, or other signs of a pre-planned incident. If they see signs of fire, they should identify the location and nature of the fire and inform the office, so that school personnel can direct students and staff away from that area.

Teachers should evaluate the best and most appropriate evacuation route every time a fire alarm sounds. Before leading students around a corner or down a hallway, examine the location for signs of danger – fire or smoke, unknown persons, unusual sounds, or other suspicious circumstances. If the route presents potential hazards, evaluate whether a different evacuation route would be preferable.

Another technique to discourage channeling similarly aligns with good fire safety practices. Instead of always proceeding to the nearest exit, staff should practice alternate evacuation routes, consistent with practicing what should be done if the fire were located between the classroom and the nearest exit. Furthermore, schools should practice “reverse evacuation” drills, simulating situations where students need to quickly re-enter the school building and/or be moved to a different wing.³²

Rally Points and Channeling

Assembly areas or rally points should be located a suitable distance from the school, accounting for the possibility of a real fire danger, gas leak, or attacker. Does the evacuation site contain concealment or cover that would prevent an attacker from targeting evacuees, such as trees, a hill, or a ditch or depression? Is there an alternative location that would limit the ability to attack students?

In the event of an act of violence, remember that no plan can account for every variable. Consider that a pre-planned rally point may not *always* be the best location to congregate. For example, a teacher could be leading her class away from a hazard in the

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school only to hear what sounds like gunshots coming from the rally point. The children's safety, *based on information known to the teacher at that time*, could be increased by deviating from the plan and instead leading the children to another location. The alternate location might be a secondary rally point or an impromptu location based on the teacher's observations – behind a neighboring building, hidden in the garage of a nearby house, concealed in a drainage ditch, etc. The teacher will still maintain accountability of every student in her charge, and will inform administration of their location as soon as practicable. While administrative student accountability may be temporarily delayed, student safety may be enhanced.

Fire Drills

While schools are required to conduct unannounced fire drills, they are encouraged to work with their local law enforcement agency and fire department in the conduct of these drills. Consider whether requesting the presence of law enforcement and/or fire personnel would enhance student perception of safety when conducting these drills.

LAW ENFORCEMENT, FIRE, AND EMS RESOURCES

- DPI Mandatory reporting online training module: https://media.dpi.wi.gov/sspw/av/school-violence/story_html5.html
- Safe Schools Legal Resource Manual, Wisconsin Department of Justice: <https://www.doj.state.wi.us/sites/default/files/school-safety/safe-schools-manual-2016.pdf>
- National Association of School Resource Officers: <https://nasro.org>
- DPI School Resource Officer page, including best practices and example MOU: <https://dpi.wi.gov/sspw/safe-schools/school-resource-officers>
- Wisconsin Juvenile Officers Association: <http://www.wjoa.com/>
- Fire resources
 - Wisconsin school fire code requirements: <https://dsps.wi.gov/Documents/Programs/FirePrevention/SchoolsTheFireCode2018.pdf>
 - Department of Safety and Professional Services fire drill form SBD-11: <https://dsps.wi.gov/Documents/Programs/FirePrevention/SBD11.pdf>
 - Fire drills, channeling, and reverse evacuation: <https://hayesschoolsafetysecurity.com/2018/02/18/another-school-shooting-ideas-to-remember/>

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TIP LINE

School safety requires several components for a comprehensive approach. Tip lines are an important component to school safety. The Columbine Review Commission included the use of tip lines as a specific recommendation for a safe place for students to share information concerning school violence.³³ Tip lines are a condensed method to receive confidential information from students, schools, and members of the community. Students are the most well-informed members of the communication highway in schools. In a majority of school attacks at least one person knew about the plan and it was often a student. Tip lines provide a safe place to break a code of silence and provide students with a voice to report information free of retaliation.

Statistically, tip lines receive the most tips from Friday evening through Sunday afternoon—a safe time away from school with a safe avenue to report school violence (or other forms of victimization that can lead to school violence). Tip lines are another tool available to ensure that students are proactive and take responsibility for issues that they are confronted with on a daily basis.

Tip lines require buy-in from many different stakeholders, including school personnel, law enforcement, parents, students and community members. The Office of School Safety included several of these stakeholders in the OSS Technology Subcommittee early on in the implementation of a state wide tip line. In addition, a requirement of the \$100 million dollar School Safety Initiative grant is to participate in and promote the Department of Justice confidential reporting application or tip line. The grant monies also allowed schools to purchase individual school tip lines. A state wide tip line will be an additional tool for those schools that purchased tip lines and also a tool for smaller schools that could not afford to sustain an individual school tip line.

The Wisconsin tip line projects implementation in 2019.

TIP LINE RESOURCES

- Suicide applicability: <https://www.jsonline.com/story/life/family/2018/08/16/wisconsin-student-suicide-rates-drop-summer-rise-school-year/925915002/>

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SCHOOL SAFETY INTERVENTION TEAM

The School Safety Intervention Team (SSIT) is a key component of a school's anti-violence program.³⁴ Schools would typically have an SSIT in each middle and high school, with multiple elementary schools perhaps sharing an SSIT. However, due to unique school differences, SSITs may be a multi-school, district-wide, or regional team.³⁵ To be effective, the SSIT must meet at regular intervals, in person, not less than once per quarter. However, many SSITs will find it necessary to meet more often, in addition to meeting when needed to perform threat assessments.

School Safety Intervention Teams perform these key tasks:

- It performs ongoing violence-related threat assessments, behavior monitoring, and intervention. The SSIT tracks, monitors, assists, and intervenes with at-risk-for-violence youth.
- It conducts all Threat Assessment Team (TAT) tasks
 - Utilizes standardized DOJ TAT process, format, and organization
 - Utilizes standardized DOJ Violence Risk Assessment (VRA)
 - Reports VRA data from specific, plausible, and imminent threats to the DOJ utilizing the DOJ reporting form

The SSIT should include these members:

- At least one person who has completed the 12-hour NASRO Adolescent Mental Health training course³⁶
- At least one member that has completed Threat Assessment Team training
- At least one member of local law enforcement agency, often the School Resource Officer (if the school has an SRO)

THREAT ASSESSMENT

One of the roles of the SSIT is performing threat assessments. The U.S. Secret Service (USSS) and the U.S. Department of Education (DoED) believe that the use of a threat assessment protocol is the most important part of a school violence prevention program. Each school should ensure that trained people conduct a threat assessment on any individual who may present a foreseeable risk of violence to the school.

A threat assessment team requires training to improve understanding of the threat assessment process. Written policy and procedures should specify the use of a formal tool to provide consistency in how assessments are performed. A "zero-tolerance-to-threats" approach ensures that all threats will be treated equally and investigated the same way. (It is the threat itself that will be treated the same, in every instance, not the student.³⁷)

The FBI defines a threat as, "an expression of intent to do harm or act out violently against someone or something." Once a threat is made, its level of risk must be assessed. A threat assessment is an assessment of behavior and risk. It is not an "evaluation" similar to an ADHD or special educational needs evaluation. A threat assessment does not require parental permission.

A threat assessment does not require parental permission.

Six principles form the foundation of the threat assessment process.

1. Targeted violence is the end result of an understandable, and oftentimes discernible, process of thinking and behavior – a "pathway to violence."
2. Targeted violence stems from an interaction among the individual, the situation, the setting, and the target.
3. An investigative, skeptical, and inquisitive mindset is critical to successful threat assessment.
4. Effective threat assessment is based upon facts, rather than on characteristics or "traits."

5. An “integrated systems approach” should guide threat assessment inquiries and investigations.
6. The central question in a threat assessment inquiry or investigation is whether a student poses a threat, not whether a student has made a threat.

Furthermore, the USSS and DoED identified key findings which can assist trained SSITs in evaluating and assessing threats.

- Incidents of targeted violence at school rarely are sudden, impulsive acts.
- Prior to most incidents, other people knew about the attacker’s idea and/or plan to attack.
- Most attackers did not threaten their targets directly prior to advancing the 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 suicide.
- Many attackers felt bullied, persecuted or injured by others prior to the attack.
- Most attackers had access to and had used weapons prior to the attack.
- In many cases, other students were involved in some capacity.
- Despite prompt law enforcement responses, most shooting incidents were stopped by means other than law enforcement intervention.

The Threat Assessment Process

When assessing a threat, the SSIT should examine the following investigative themes:

- The student’s motives and goals.
- Concerning, unusual, or threatening communications.
- Inappropriate interest in weapons, school shooters, mass attacks, or other types of violence.
- Access to weapons.
- Stressful events, such as setbacks, challenges, or losses.
- Impact of emotional or developmental issues.
- Evidence of desperation, hopelessness, or suicidal thoughts/gestures.
- Whether the student views violence as an option to solve problems.
- Whether others are concerned about the student’s statements or behaviors.
- Capacity to carry out an attack.
- Evidence of planning for an attack.
- Consistency between the student’s statements and actions.
- Protective factors such as positive or prosocial influences or events.

If the completed assessment determines that the threat is viable, then law enforcement should begin a criminal investigation. Once the criminal investigation begins, it is the responsibility of both law enforcement and the school to manage the threat. If possible, the situation or student should be controlled to prevent an attack. Either psychiatric commitment or an arrest for a criminal charge could be possible in this situation. Less restrictive options may be available to mitigate the threat, depending on resources available in the community.

If specific targets have been identified, disclosure of the nature of the threat and its source may be indicated in order to protect an unaware target. Law enforcement may provide help in obtaining protective court orders and/or increase police presence to help protect the target³⁸. If the target is in the school or is the building itself, the school district should take strides to prevent access by the threatening individual.

The Four-Pronged Threat Assessment

A four-pronged threat assessment should be conducted on every person who makes a medium or high-risk threat. In each of these prongs *the assessor must not project their perception of the student*. Instead, the assessor should base the assessment on *information gathered during the interview from the student's perspective*.

1. The personality of the student
2. The family dynamics of the student
3. The school dynamics and the student's perceived role in them
4. The social dynamics of the student

During the completion of a threat assessment tool, it is important that all four prongs of the threat assessment be examined. This should be achieved by combing through school records (current and previous schools), completing collateral school interviews, parent/guardian interviews, interviews of the threatening student and potential target interviews. Additionally, records from the juvenile justice system and child protective services (in counties of current and previous residences) should be examined. If the parent/guardian or threatening student is unwilling to take part in the process, law enforcement and the school should consider this an escalation of the risk. Law enforcement should then treat the examination of the threat as a criminal investigation.

It should be noted that the completion of a threat assessment does not excuse a school district from following all Individuals with Disabilities Education Act or Americans with Disabilities Act requirements for students with disabilities. Instead, the threat assessment process should be completed concurrent to any Individuals with Disabilities Education Act or Americans with Disabilities Act required process, to determine if the child's needs are being met by their current services. Conversely, the presence of an IEP does not excuse a school district from completing a threat assessment.

First Prong – Student Personality

"Leakage" is one of the most important clues that a person may carry out a violent threat. The FBI defines leakage as, "when a student intentionally or unintentionally reveals clues to feelings, thoughts, fantasies, attitudes or intentions that may signal an impending violent attack." In a very overt manner, the person has a preoccupation with violence, is full of hate, and/or appears isolated. Leakage is especially relevant because at least ¾ of the time violent attackers told at least one other person of the impending attack, and in 25% of incidents they directly told the intended targets.

One of the Columbine attackers "leaked," i.e. posted the following on his webpage:

"I'm coming for EVERYONE soon and I will be armed to the fucking teeth and I will shoot to kill...GOD I can't wait 'til I can kill you people...Feel no remorse, no sense of shame...I don't care if I live or die in the shoot-out. All I want to do is kill and injure as many of you pricks as I can..."

Besides leakage, several other traits are important when assessing personality. People carrying around a rather large "hurt locker" or "hit list" could be considered high risk. This type of person has a low tolerance for frustration and is easily upset by real or perceived injustices. They have poor coping skills, handle rejection in a very immature and disproportionate manner, lack resiliency, and are unable to regroup after failure. Individuals who make violent threats will often appear to be narcissistic; lack empathy; and blame others for their failures.

Showing emotion is considered a sign of weakness, and they will most likely show an attitude of superiority or arrogance. This behavior often masks low self-esteem. They'll often display indications of intolerance toward racial groups, religions or sexual orientation. They will often appear to be rigid and opinionated, even when they have no concrete information on which to base their opinion. They may report feeling like an "outsider" or not fitting in, regardless of how many people they interact with daily. They may employ an insulting or inappropriate sense of humor, and may have negative role models such as Hitler, Satan, or previous mass casualty shooters. An unusual interest in sensational violence and violent entertainment is common, including

particular interest in past violent attacks. A threatening person will practice with firearms or other weapons, search the internet for bomb making instructions, and plan to the exclusion of other activities.

While a mental health diagnosis is not indicative of being likely to carry out a violent threat, some people may notice a sudden change in the student's behavior. A change in academic performance, disdain for rules, and change in dress are common.

Second Prong – Family Dynamics

The second assessment prong considers the dynamics within the family. A turbulent parent/child relationship could be an indicator of high risk. If the family has moved several times or there have been past allegations of child abuse or neglect in the home, there is elevated risk.

Parents who protect their child regardless of serious pathological behavior further elevate the risk. Another risk elevation is a child who "rules the roost" and intimidates parents into giving them inappropriate amounts of privacy and/or unlimited access to the internet and television. Parents who do not properly secure weapons and provide direct and unsupervised access to the means for carrying out a violent threat seriously elevate the risk of an attack being carried out.

Third Prong – School Dynamics

The third prong examines how the student feels they fit into the school's dynamics. A student at high risk for violence may feel detached from the school, its students, and its activities. Another risk factor is the student's perception of the school's tolerance for disrespectful behavior. If the student perceives that the school ignores bullying, or does not challenge racial/class divisions, the risk may increase. The threatening student may perceive that there is a pecking order among students or inequitable discipline.

Surviving attackers were interviewed after the fact. This quote comes from the 16-year-old 1997 Pearl, Mississippi attacker: *"Every time I was bullied it was always a reminder that they didn't want me, that I'd never fit in, that I'd never be one of them. You go through life feeling like you're on the outside looking in."* A 15-year-old Springfield, Oregon attacker who killed his parents and two classmates and wounded 25 others wrote, *"I feel like everyone is against me, but no one ever makes fun of me, mainly because they think I'm a psycho. There is one kid above all others that I want to kill. I want nothing more than to put a hole in his head."* These statements, and others like them, indicate an institutional acceptance of bullying and threatening behavior.

Fourth Prong – Social Dynamics

The fourth prong examines the social dynamics of the community at large and how the student fits into them. The way a student views the world can be controlled somewhat by parental limitations. Without limits on what the student views on television or the internet, there is a higher risk of violent behavior. A student's peer group, as mentioned before, may limit their access to the "reality check" that another group can offer them. Though it would be atypical for a student that commits a violent act on the scale of the Columbine massacre to be under the influence of intoxicants, it is important to know if there is a sudden change in their use of intoxicants.

Threat Classification

Low-risk threats are vague, implausible, or unrealistic. Medium-risk threats are more direct and concrete, with indications that they have been considered over a period of time or make a general statement about place and time, but *without* any signs that preparations have been made to carry out the threat. High-risk threats exhibit planning and/or demonstrate steps towards carrying out the threat, such as practicing with weapons to be used. High-risk threats are direct, specific, and plausible. The following are examples of behaviors associated with each level of risk.

Low

An elementary school aged student says that they are going to London to throw themselves off the London Bridge today. This is not a realistic threat, and is not likely to be carried out.

Medium

A girl sees a picture of her boyfriend with another girl on social media. She states on her social media profile, "I'm going to get her at school tomorrow." There is a timeline for the attack, but the threat does not say what the suspect is going to do to the target. There is time to intervene as the students are not in school and do not currently have access to one another.

High

A boy posts a picture of a firearm on his social media page. The caption states, "This is my only friend. We are both coming to school today. Let the bodies hit the floor." This is a direct and specific threat to bring a firearm to school today. It is plausible as it appears the student does possess his weapon of choice. It appears as though he has had some forethought into the attack as he has obtained the weapon and posted on social media about it.

Possible Resolutions

Once a threat classification has been assigned, a response to that behavior must be made. The threat assessment team will be a part of that decision. However, each school district will need to evaluate potential resolutions based on their policy and code of conduct. Additionally, law enforcement, social services, and other stakeholders will need to determine if there are actions they will need to take in this situation.

Keep in mind that there may be additional stakeholders outside of the threat assessment team that may be of value to the team in determining the appropriate outcomes or the plan of protection. Teams should consider including any community case managers, special education case managers, counselors/therapists, parents and mentors.

Family Educational Rights and Privacy Act

According to the Family Educational Rights and Privacy Act (FERPA), schools must have permission to release student records. Records may be released in certain circumstances without the consent of parents or students. One of those circumstances is to, "appropriate officials in cases of health and safety emergencies." Another is to "State and local authorities, within a juvenile justice system, pursuant to specific State law." Furthermore, schools can disclose information that is considered "directory" information without consent.³⁹ "Directory" information is determined by school board policy and may include such information as a student's name, address, phone number, date of birth, place of birth, and dates of attendance.

Wisconsin State Stat. § 118.125(2) regarding confidentiality and disclosure of pupil records provides additional guidance. This statute states that, "Pupil records shall be made available to persons employed by the school district which the pupil attends who are required by the department under §115.28(7) to hold a license, law enforcement officers who are individually designated by the school board and assigned to the school district, and other school district officials who have been determined by the school board to have legitimate educational interests, including safety interests, in the pupil records." Under FERPA 34 C.F.R. §99.31(a)(1)(B) and 99.33(a), the law enforcement officer and other school district officials designated by the school board may not redisclose the information except as otherwise authorized by statute.

The U.S. Department of Education specifically lists teams performing threat assessments as eligible to view student information that would otherwise be confidential.⁴⁰

Digital Threat Assessment

Digital threat assessment is the analysis of threats made via social media platforms. Student use of Snapchat, Facebook, Instagram, and other social media platforms provides another avenue through which threats may be relayed or discovered.

Schools should partner with their local law enforcement agency in the expectation that information discovered on social media may need to be identified and preserved. It's important to know how to contact the platform in order to preserve necessary information or evidence, request the IP address of the person making the threat, and comply with any necessary legal requirements to do so.

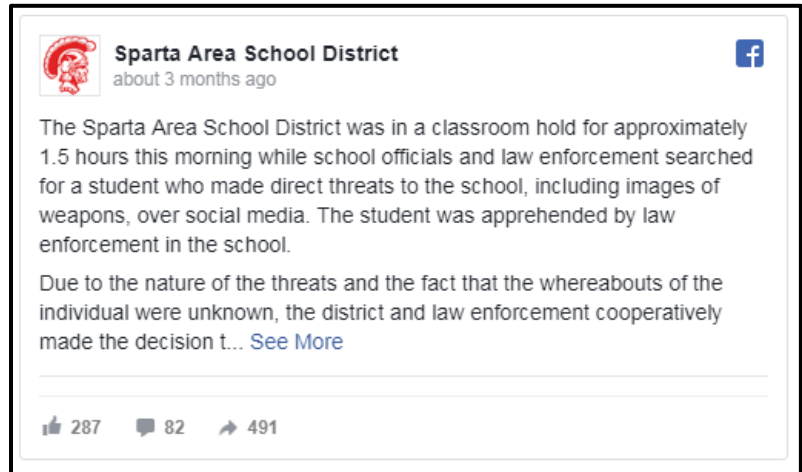


Figure 4: Sparta [WI] Facebook post

Digital threat assessment training is available around the state and supported by many organizations including the Office of School Safety.

REINTEGRATION, FOLLOW-UP, AND MONITORING

A Case Plan/Plan of Support will help the team determine if the concerning person is complying with requirements to mitigate their concerning behavior, and to assist them in building capacity to interact with peers in a more positive manner. For each requirement listed in the plan, a person should be responsible to make sure that requirement is being complied with. This should include the duration and frequency of assigned tasks, as well as a specific date set for the team to review progress. A plan of support can include a variety of actions. The following is a list of suggestions for a plan of support, but a school district may take any other actions that are legal and necessary:

- Check-in/Check-out
- Mentoring
- Bag/Locker searches
- Appropriate assessments by counselor/therapist
- Change of schedule/placement

The team should be meeting regularly to review case plans completed on previous threat assessments. During those meetings, reports should be given to the team regarding the concerning person's compliance/progress. At that time, the team will determine if it is appropriate to decrease or elevate the Threat Classification assigned to the concerning person. The team may also decide that the person's progress has been successful enough to discontinue the Case Plan or Plan of Support.

Again, it is the responsibility of the team leader to make sure all of the assigned tasks in the plan of protection are being completed successfully. If the student requires an extended period of monitoring, regular meetings of the threat assessment team will be scheduled and documented.

Once the concerning behavior is mitigated there should be an attempt to return to normal. It may be difficult to determine what normal will look like for the threatening individual. As best practice dictates in the treatment of juveniles, this should happen in the least restrictive environment. School administrators and law enforcement should provide a supportive environment for the threatening individual and the safest situation possible for the victims.

THREAT ASSESSMENTS ON STAFF AND OTHERS

While assessments of students will be most common, the SSIT may be called upon to assist with safety planning for staff, parents, or vendors. For example, at least two Wisconsin active shooter events involve a domestic dispute.⁴¹ Domestic murders have happened in American schools.⁴² Thus, the SSIT must be prepared to evaluate non-students and implement measures to protect staff and students from non-student threats.

SCHOOL SAFETY INTERVENTION TEAM RESOURCES

- Wisconsin Threat Assessment Protocol
- Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence.
https://www.secretservice.gov/data/protection/ntac/USSS_NTAC_Enhancing_School_Safety_Guide_7.11.18.pdf
- Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates.
https://www.secretservice.gov/data/protection/ntac/ssi_guide.pdf
- The school shooter: A Threat Assessment Perspective. <https://www.fbi.gov/file-repository/stats-services-publications-school-shooter-school-shooter>
- The final report of the safe school initiative: Implications for the prevention of school attacks in the United States.
<https://www2.ed.gov/admins/lead/safety/preventingattacksreport.pdf>
- FERPA
 - *Sharing Information Across Systems 2018 Publication*,
https://dpi.wi.gov/sites/default/files/imce/sspw/pdf/SharingInfo_11-16-18.pdf
 - *School Resource Officers, School Law Enforcement Units, and the Family Educational Rights and Privacy Act*, U.S. Department of Education,
https://studentprivacy.ed.gov/sites/default/files/resource_document/file/SRO_FAQs_2-5-19_0.pdf

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CRISIS REHEARSAL AND RESPONSE

It is critically important that schools conduct routine drills that practice the appropriate response to a variety of safety threats – fire, weather emergencies, and violence. Some people have asked whether practicing violence drills might have a traumatic effect on children.⁴³ When correctly conducted in an age-appropriate manner these drills are not harmful. Indeed, students have said they are reassured knowing that staff has practiced a plan to keep students safe in such an event.⁴⁴ The head of the National Association of School Psychologists “and other experts agreed that drilling is essential, both to protect students from physical injury and to ease the stress of going through a real-life emergency, but the drills must be done with care.”⁴⁵

VIOLENCE DRILLS

If staff and students have not previously practiced their response, they are very unlikely to be able to perform it when necessary. In a crisis, delayed implementation of lock-down, lock-out, or other appropriate responses can result in an ineffective response. Some schools have gone into lockdown after an incident is already over. While this may shelter students against a potential “coordinated attack,” it is most strongly preferred to react immediately upon detecting danger, with implementation within seconds.

Ineffectiveness of Preparation without Practice

LESSONS LEARNED FROM THE EXPERIENCE OF OTHERS – WHAT WOULD *You* Do?

Case Study #3: Your Wisconsin facility has an excellent emergency plan, clearly marked emergency exits, pre-planned evacuation points, and complete emergency contact information. You even have “grab-and-go” emergency kits stationed by each emergency exit. But you have not rehearsed “live” drills with your staff...
[See Appendix A for additional information.]

This case study is an actual event that occurred in Wisconsin. The business had *excellent* emergency plans in place – far beyond that of most businesses. They had pre-planned rally points, clearly marked emergency exits, placed emergency kits by exit doors, and maintained staff phone trees and contact information. However, when an active shooter event occurred little of it was used. Personnel ran past emergency exits to use the exit they normally used; emergency kits were not taken along; rally points were not used; and emergency contact information was left behind. This was not a lack of planning – it was a lack of practice. (*This is not a criticism of the business, which was far better prepared than most. Instead, this is a directly applicable learning point that confirms that practice is necessary for proper performance. Also see: football team, school band, forensics, school play, etc..*)

Effectiveness of Emergency Drills

LESSONS LEARNED FROM THE EXPERIENCE OF OTHERS – WHAT WOULD *You* Do?

Case Study #4: Your small-town elementary school doesn't have every latest security upgrade, but the principal is very safety-conscious and ensures that staff and students rehearse an assortment of safety drills, including lockdown and evacuation. She personally led both lockdown drills and evacuation-to-rally-point drills for all staff and students...

WISCONSIN SCHOOL SECURITY FRAMEWORK

A small-town elementary school principal was very safety conscious. She ensured the school's doors were locked during the day, visitors were properly screened, and the school regularly practiced emergency drills. Indeed, her school conducted an evacuation drill two months prior to a shooting and practiced a lockdown drill just a week before the event.

When a murderer shot through the front windows to gain entry to the school, that principal died confronting the shooter. The shooter then entered a first-grade classroom before the door could be closed and locked. When the attacker's weapon jammed, students were able to run past him out of the classroom. Students precisely followed the evacuation route they'd practiced less than two months earlier, staying on the sidewalk and going to the rally point at the nearby fire station. Students who had just witnessed their peers being murdered were able to follow emergency instructions *because they had previously practiced these tasks*.⁴⁶

While Dawn Hochsprung couldn't prevent the attack, she had ensured that her staff *knew and practiced* evacuation and lockdown procedures. That saved lives. Other lessons from this incident, such as appropriate locks, communication systems, etc., are incorporated into recommendations throughout this *Framework*.



Figure 5: Sandy Hook Principal Dawn Hochsprung's Tweet two months before the attack

PROPERLY CONDUCTING DRILLS

"The effectiveness of armed assailant drills relies on educating and training adults carefully, responsibly, and continually. Students look to faculty and staff for direction and guidance. When adults are well-trained and stay calm, the students will follow and gain confidence and ability."⁴⁷

Schools are most strongly encouraged to adopt these guidelines, as well as those published by the National Association of School Psychologists and the National Association of School Resource Officers:

1. Violence drills should follow a natural progression from basic to more advanced exercises at an appropriate level for each age.
2. Unannounced violence drills are discouraged. Violence drills should be announced shortly in advance of the drill. Note that announcing the drill a day in advance could allow a perpetrator to hijack the event. Providing notice an hour or two in advance reduces the hijack risk while preventing staff and student surprise.
3. Prepare students for the drill by discussing expectations, pointing out the safe zone, and answering questions.⁴⁸ Student participation is important to the effectiveness of the drill. Planning should include how students with disabilities may be accommodated in crisis preparedness, including reduced mobility, heightened stress reactions, cognitive disabilities, and other factors.⁴⁹
4. Every violence drill should clearly, unmistakably, and repeatedly be announced as a drill.
5. Rooms in lockdown should remain in lockdown until released following the Standard Response Protocol.

DRILL DEBRIEFS

For maximum effectiveness and to allay student concerns, each classroom teacher is encouraged to hold a classroom conversation following the drill. The conversation should address "the purpose of the drill, and the observed outcome for that

classroom. Additionally, self-evacuation and other life safety strategies can be discussed. Any issues should be addressed gently but immediately.”⁵⁰

Schools must also review and debrief their systemic performance. All staff should self-identify individual strengths and areas for improvement, while administration reviews their own actions and documents the drill following the requirements of Act 143 (see *School Board Responsibilities*).

STANDARD RESPONSE PROTOCOL

Having discussed the absolute necessity for rehearsing crisis response plans, what is the actual plan that should be rehearsed? The DOJ strongly recommends that schools adopt the *Standard Response Protocol* (SRP) promulgated by the I Love U Guys Foundation. The following section quotes heavily from the SRP.

The SRP is not a replacement for any school safety plan. It is simply a classroom response enhancement for critical incidents, designed to provide consistent, clear, shared language and actions among all students, staff and first responders. As a standard, SRP is being adopted by emergency managers, law enforcement, school and district administrators and emergency medical services across the country. Hundreds of agencies have evaluated the SRP and recommended the SRP to thousands of schools across the US and Canada.

Historically, schools have taken a scenario-based approach to respond to hazards and threats. It's not uncommon to find a stapled sheaf of papers or even a tabbed binder in a teacher's desk that describes a variety of things that might happen and the specific response to each event. The Standard Response Protocol is based not on individual scenarios but on the response to any given scenario. Like the Incident Command System (ICS), SRP demands a specific vocabulary but also allows for great flexibility. The premise is simple – there are four specific actions that can be performed during an incident. When communicating these actions, the action is labeled with a “Term of Art” and is then followed by a “Directive”. Execution of the action is performed by active participants, including students, staff, teachers and first responders.

The SRP is based on these four actions. Lockout, Lockdown, Evacuate and Shelter. In the event of an emergency, the action and appropriate direction will be called on the PA.

Lockout

Lockout is called when there is a threat or hazard outside of the school building. Whether it's due to violence or criminal activity in the immediate neighborhood, or a dangerous animal in the playground, Lockout uses the security of the physical facility to act as protection.

ANNOUNCEMENT: The public address for Lockout is: “Lockout! Secure the perimeter” and is repeated twice each time the public address is performed.

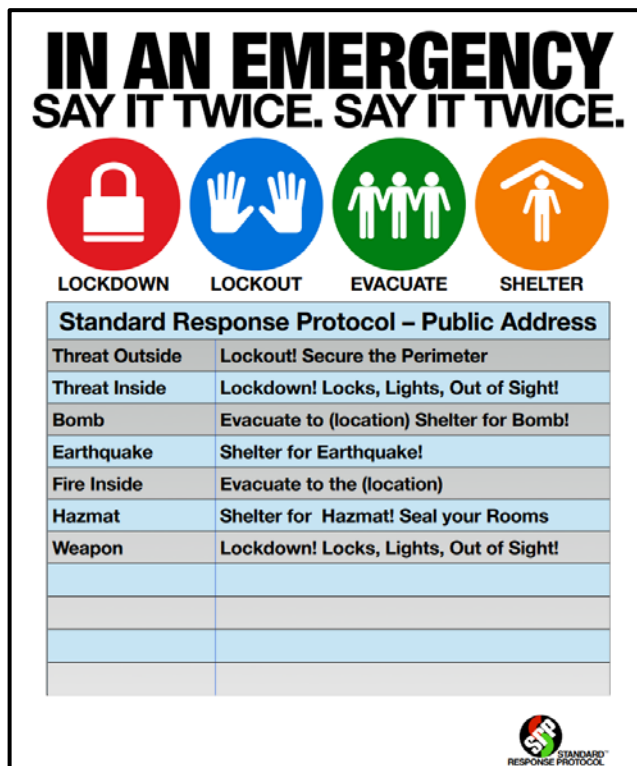


Figure 6: SRP lends commonality to emergency responses



WISCONSIN SCHOOL SECURITY FRAMEWORK

ACTIONS: The Lockout Protocol demands bringing students into the main building and locking all outside access points. Where possible, classroom activities would continue uninterrupted. Classes that were held outside, such as gym class, would return to the building and if possible continue class inside the building. There may be occasions where students expect to be able to leave the building - end of classes, job commitment, etc. Depending on the condition, this may have to be prevented. During the training period, it should be emphasized to students as well as their parents that they may be inconvenienced by these directives, but their cooperation is important to ensure their safety. **STUDENTS:** Return to inside of building, do business as usual. **TEACHERS:** Recover students and staff from outside building, increased situational awareness, do business as usual, take roll and account for students.

Lockdown

Lockdown is called when there is a threat or hazard inside the school building. From parental custody disputes to intruders to an active shooter, Lockdown uses classroom security to protect students and staff from threat.

ANNOUNCEMENT: The public address for Lockdown is: "Lockdown! Locks, Lights, Out of Sight!" and is repeated twice each time the public address is performed.

ACTIONS: The Lockdown Protocol demands locking individual classroom doors or other access points, moving room occupants out of line of sight of the corridor windows and having room occupants maintain silence. There is no call to action to lock the building outside access points. Rather, the protocol advises to leave the perimeter as is. The reasoning is simple – sending staff to lock outside doors exposes them to unnecessary risk and inhibits first responders entry into the building. Teachers and student training reinforces the practice on not opening the classroom door, once in Lockdown. Rather, no indication of occupancy should be revealed until first responders open the door. **STUDENTS:** Move away from sight, maintain silence. **TEACHERS:** Lock classroom door, lights out, move away from sight, maintain silence, wait for first responders to open door, take roll and account for students.



Evacuate

Evacuate is called when there is a need to move students from one location to another.

ANNOUNCEMENT: The public address for Evacuate is: "Evacuate! To a Location" and is repeated twice each time the public address is performed. For instance "Evacuate! To the Flag Pole. Evacuate! To the Flag Pole."

ACTIONS: The Evacuate Protocol demands students and staff move in an orderly fashion. **STUDENTS:** Bring your phone, leave your stuff behind, form a single file line, show your hands, and be prepared for alternatives during response. **TEACHERS:** grab roll call sheet if possible, lead students to Evacuation Location, take roll and account for students.



Shelter

Shelter is called when the need for personal protection is necessary. Training should also include spontaneous events such as tornado, earthquake or hazmat.

ANNOUNCEMENT: The public addresses for shelter should include the hazard and the safety strategy. The public address is repeated twice each time the public address is performed. Hazards may include tornado, hazardous materials, earthquake, etc. Safety Strategies may include: evacuate to shelter area, seal the room, drop cover and hold, etc.



WISCONSIN SCHOOL SECURITY FRAMEWORK

ACTIONS: It is strongly advised to remain current on both FEMA guidance regarding Shelter actions as well as local emergency manager guidance. **STUDENTS:** Appropriate hazards and safety strategies. **TEACHERS:** Appropriate hazards and safety strategies, take roll and account for students.

Hold

"Hold" is an optional fifth protocol for situations that require students to remain in their classrooms. For example, an altercation or medical emergency in the hallway may demand keeping students out of the halls until it is resolved. Because this is almost exclusively a day-to-day operational demand rather than an action shared with first responders this is not a core SRP action.



ANNOUNCEMENT: The public address for Hold is: "Hold in your classroom" and is repeated twice each time the public address is performed.

ACTIONS: Students and teachers are to remain in their class- room, even if there is a scheduled class change, until the all clear is announced.

Lockout vs Lockdown

The differentiation between Lockout and Lockdown is a critical element in SRP. A Lockout recovers all students from outside the building, secures the building perimeter and locks all outside doors. This would be implemented when there is a threat or hazard outside of the building. Criminal activity, dangerous events in the community, or even a vicious dog on the playground would be examples of a Lockout response. While the Lockout response encourages greater staff situational awareness, it allows for educational practices to continue with little classroom interruption or distraction.

Lockdown is a classroom-based protocol that requires locking the classroom door, turning off the lights and placing students out of sight of any corridor windows. Student action during Lockdown is to remain quiet. It does not mandate locking outside doors. There are several reasons for not locking perimeter doors during a Lockdown. Risk is increased to students or staff in exposed areas attempting to lock outside doors. Locking outside doors inhibits entry of first responders and increases risk as responders attempt to breach doors.

There may be situations where both Lockdown and Lockout need to be performed, but in this case they are identified individually. "Lockout! Secure the Perimeter. Lockdown! Locks, Lights, out of Sight." would be announced on public address. "We are in Lockdown and Lockout" would be conveyed to emergency services or 911.

SRP Benefits

The benefits of SRP become quickly apparent. By standardizing the vocabulary, all stakeholders can understand the response and status of the event. For students, this provides continuity of expectations and actions throughout their educational career. For teachers, this becomes a simpler process to train and drill. For first responders, the common vocabulary and protocols establish a greater predictability that persists through the duration of an incident. Parents can easily understand the practices and can reinforce the protocol. Additionally, this protocol enables rapid response determination when an unforeseen event occurs.

The protocol also allows for a more predictable series of actions as an event unfolds. An intruder event may start as a Lockdown, but as the intruder is isolated, first responders would assist as parts of the school go to an "Evacuate to the Gym and Lockdown," and later "Evacuate to the Bus Zone."

School districts are encouraged to examine the Standard Response Protocol for implementation within the school's crisis plan.

LESSONS LEARNED FROM THE EXPERIENCE OF OTHERS – WHAT WOULD *You* Do?

Case Study #3: A veteran staff member collapsed in a high school classroom while assisting a student. She suffered a cardiac arrest. What actions must be regularly rehearsed before such an incident to ensure well-practiced emergency response, and what actions must be taken *right now* to save her life?

ADDITIONAL CRISIS RESPONSE OPTIONS

Many schools have implemented additional response options such as ALICE, Avoid/Deny/Defend, Run/Hide/Fight, PWG's Active Shooter Preparedness, "Stop the Bleed," and others. These programs can be invaluable enhancements to a school's safety and security. However, schools must understand that these programs supplement, not replace, the foundational elements promoted in this *Framework*.

STANDARD REUNIFICATION METHOD

Following a crisis school officials remain responsible for reunifying students with their family. Note, however, that reunification isn't only used following a violent incident. It may also be needed for fires, floods, tornadoes, blizzards, power outages, bomb threats, etc. In some cases it may be only a partial student population reunification. For instance, criminal activity in the area might result in reunifying students who walk to and from school.

The DOJ recommends the *Standard Reunification Model* (SRM) promulgated by the I Love U Guys Foundation. The following section quotes heavily from the SRM.



The Standard Reunification Method provides school and district safety teams with proven methods for planning, practicing and achieving a successful reunification.

Without a plan to reunite students and parents, the responsibility of the school and district in maintaining the chain of custody for every student can be lost. A predetermined and practiced reunification method ensures the reunification process will not further complicate what is probably already a chaotic, anxiety-filled scene. In fact, putting an orderly reunification plan into action will help defuse the emotion building at the site.

A reunification typically occurs because of a crisis or emergency. Consequently, not just students and parents are trying to function at extraordinary stress levels; staff, their families and other first responders also feel the strain. By having a defined process with signage, cards, branding, procedures and protocols, the school presents an organized, calm face to all involved. Fear or uncertainty often results from the unknown. By adopting, communicating and practicing a “known” procedure, the school removes some of that uncertainty.

Process

One benefit of the Standard Reunification Method is its simplicity:

- Establish a parent check-in location.
- Deliver the students to the student staging area beyond the field of vision of parents/guardians.
- Once students are on site notify parents of location.
- “Greeters” direct parents/guardians to the parent check-in location and help them understand the process.
- Parents/guardians complete Reunification Cards.
- Procedure allows parents/guardians to self-sort during check in, streamlining the process.
- The “Reunifier” recovers student from the student staging area and delivers to the parent.
- Controlled lines of sight allow for an orderly flow and issues can be handled with diminished drama or anxiety.
- Medical, notification, or investigative contingencies are anticipated.
- Pedestrian “flows” are created so lines don’t cross.

Complete details are available on the I Love U Guys Foundation website.

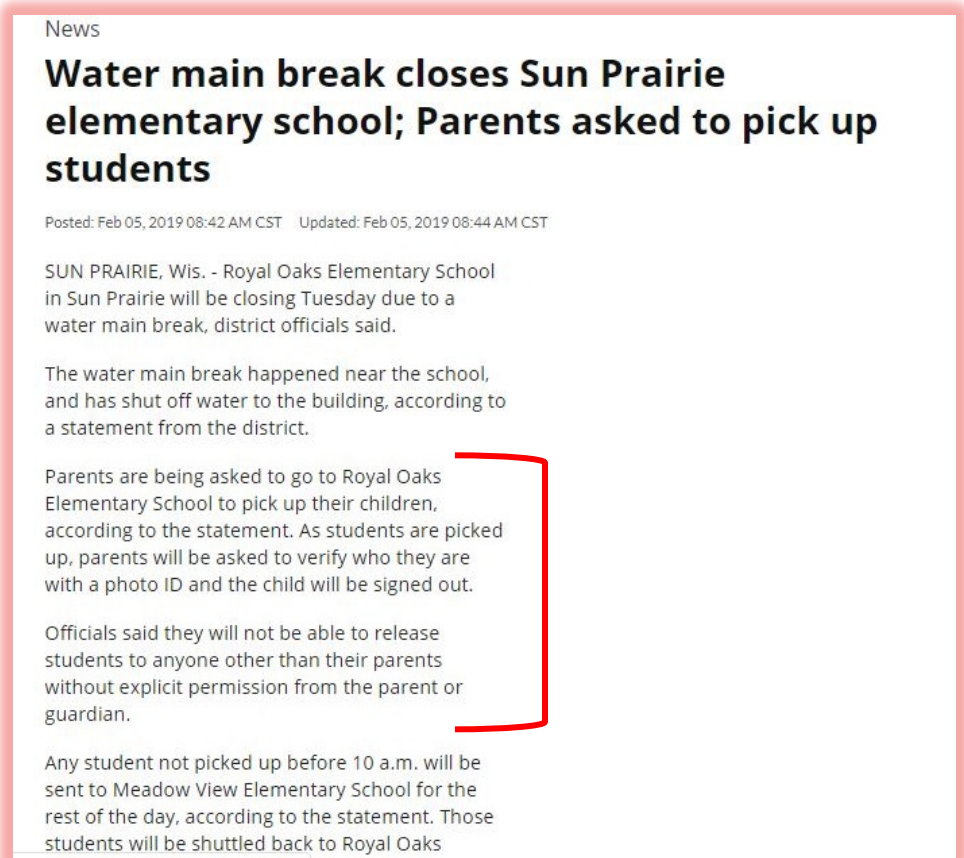


Figure 7: Madison, WI news story from [Channel3000.com](https://www.wisn.com/story/39344440/water-main-break-closes-sun-prairie-elementary-school-parents-asked-to-pick-up-students), published February 5, 2019.

CRISIS REHEARSAL AND RESPONSE RESOURCES

- Properly conducting drills
 - National Association of School Psychologists - Best Practice Considerations for Schools in Active Shooter and Other Armed Assailant Drills: <https://www.nasponline.org/resources-and-publications/resources/school-safety-and-crisis/best-practice-considerations-for-schools-in-active-shooter-and-other-armed-assailant-drills>
 - I Love U Guys Foundation – Lockdown Drill Guidance: <https://iloveguys.org/srp/Lockdown%20Drill%20Guidance.pdf>
 - I Love U Guys Foundation – Lockdown Drill Teacher Guidance: <https://iloveguys.org/srp/SRP%20K12%20Teacher%20Guidance.pdf>
- I Love U Guys Foundation: <https://iloveguys.org/>
 - Standard Response Protocol: <https://iloveguys.org/srp.html>
 - Standard Reunification Model: <https://iloveguys.org/srm.html>
- National Association of School Psychologists: <https://www.nasponline.org/>
- Stop the Bleed training: <https://www.bleedingcontrol.org/>
- ALERRT “Avoid/Deny/Defend”: <http://www.avoiddenydefend.org/>
- ALICE Training Institute: <https://www.alicetraining.com/>

CRISES IN NON-TRADITIONAL ENVIRONMENTS

2017 Wisconsin Act 143 implemented requirements that school safety plans include guidelines and procedures to address threats to non-classroom events, including recess, concerts and other performances, athletic events, and any other extracurricular activity or event.

Sporting events, concerts, plays, and similar events pose unique security challenges. The venues may contain a huge number of people, many of whom may be unknown to the school. They are large areas that may require additional personnel to monitor but are often scheduled outside of the regular school day. They can be the site of extreme competitiveness and high emotions. They are also subject to the same critical incidents that can occur in regular school environments.⁵¹

GENERAL GUIDANCE FOR NON-TRADITIONAL ENVIRONMENTS

Fortunately, many standard security practices also apply to special events, and some of their unique challenges can also contribute towards their solution.

Identify Security Needs and Scope of Event

Conduct a site assessment and risk assessment to identify the security needs of the event. Does this event have a history of security issues? Are there potentially new issues that may occur based on ongoing community or school issues? Is a bag policy or heightened screening appropriate? Consider prohibiting large bags, backpacks, and carry-ins. What other security considerations specific to this event, location, or community should be taken into account? What safety and security equipment is needed to help ensure safety? What surveillance equipment is needed? When appropriate, make arrangements to have emergency first responders such as law enforcement officers or emergency medical services stationed at the event.

Clearly identify the scope of the event, attempt to limit access to unrelated/unused areas, and coordinate with other special events and custodial staff. For example, if only concert activities are taking place and these are limited to the auditorium and band wing of the school, there is no reason for people to enter or be in the other end of the school. On the other hand, if a school play and a track meet are taking place on the same evening, event planners should consult each other on what areas will be used by each and plan how to immediately notify the other event if a crisis occurs. Finally, inform custodial staff and personnel assigned to the event the scope of the event and what they are expected to do when they observe activity outside of that area.

Safety and Security Plan

The event's coordinator must develop a safety and security plan in advance of the event. A written plan should be required for each event. It doesn't need to be long or an original work each time it is prepared. It must, however, be individualized to the facility and event, kept up to date, and kept readily available to all key personnel in the venue.

The plan should clearly designate who will serve as the school's "incident commander" (IC) in the event of a crisis and the location of the command post. This person will also be the *de facto* contact for personnel who encounter issues or problems during the event. The pre-planned IC may or may not be the coach, conductor, or director of the athletic event or performance, depending on the size of the event, responsibilities of involved school staff, and availability of other personnel. Thus, it is important to formally designate the crisis IC in advance so all personnel are aware of who will lead an emergency response if one is necessary. Ensure the IC and other appropriate personnel have completed appropriate National Incident Management System and Incident Command System training.

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The plan should also identify available resources, job assignments, and pre-planned responses to predictable emergencies. An example plan is shown in Appendix F.

Assign Personnel

First, ensure a sufficient number of personnel will be present to meet the needs of the event. These personnel may be school staff such as teachers, coaches, advisors, and assistants; paid security/event staff; or parent volunteers.

Assign an appropriate number of people to security responsibilities, even if those functions aren't their only job. For example, ticket sellers, gate attendants, ushers, and others are in a perfect position to perform their primary task *and* be alert for signs of suspicious activity. If law enforcement personnel are not assisting, consider assigning a person to be responsible for nothing other than visually screening attendees before they enter the event. All staff must understand that congregated areas are a “target-rich” environment attractive to the perpetrators of mass murder. Ask all personnel to be alert for unusual packages or signs that an individual is attempting to conceal unusual items. For example, the Columbine murderers concealed large 20-lb propane cylinders in duffel bags. The Parkland murderer concealed his large weapon in a guitar case. While large duffel bags or music instrument cases are predictably present in some environments, they would be quite unusual in others, and are potential indicators when combined with other clues attentive staff may detect. Train staff on possible signs of concealing prohibited items on a person, shown in Appendix D. Staff should be directed to immediately contact the IC, law enforcement, or emergency medical services when they observe something of note.

Consider providing easily-identifiable uniforms or high-visibility vests to personnel charged with crowd guidance or supervisory duties. This serves a similar purpose to the high-conspicuity practices often used by law enforcement and security agencies, such as cruise lights (dim steady-on blue lights on police car lightbars), flashing amber lights on security vehicles, and use of high-visibility outerwear at large events. Easily-recognizable garments make it obvious to everyone present that the school is carefully monitoring the event. In addition, in a crisis personnel can be easily identified, and the “uniform” lends a modicum of extra authority to their directives.

Some events may benefit from obvious video recording of all attendees as they enter the event, in conjunction with notifications that the entire event is being recorded for security purposes. “Smile for our security cameras ☺”

Plan Communications

Prepare a roster with contact information for all personnel listing their cell phone number and assigned radio channel, if multiple channels are used.

Provide radios to personnel with security functions. Headphones or earbuds may be necessary due to ambient noise or the necessity for quiet reception. Radios allow instant communication to multiple people simultaneously, instead of having to dial individuals one-by-one. Radios are operated by pressing a large single button, not precise finger movements that can be difficult to perform in a crisis. Radios provide other staff members with instant situational awareness of what is happening, instead of having to wait to be notified (or not being notified at all).

Cell phones are also useful. They allow non-emergency person-to-person individual contact without tying up a radio channel, and they allow the person to immediately call 911 in the event of a crisis.

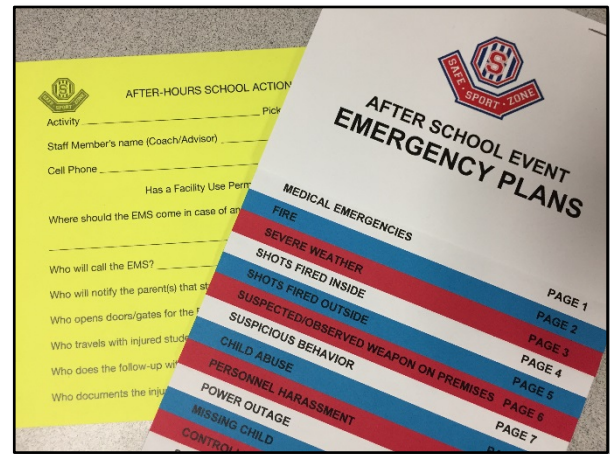


Figure 8: Commercial example of pre-printed action plans

EVENT TIMELINE

Certain tasks should usually be conducted before, during, and after each event. The following list is not comprehensive and does not address considerations for every type of after-school or special event. It does, however, serve as a tool to assist event planners in examining their specific event and ensuring that basic standards are thought out.

Before the Event

Meet with personnel and conduct a briefing. Explain the event plans and provide copies of the safety and security plan. Identify the crisis IC and conduct a short “tabletop exercise” of an example crisis response.

Explain to staff how the code of conduct will be enforced. Emplace staff with security functions in their areas of responsibility. If law enforcement is present, position the marked vehicle and uniformed officer in a high profile position.

Establish and post attendee expectations, including announcements over the public address system. Inform attendees that the event is being recorded.

During the Event

Identify and separate seating sections, i.e. student/adult/home/visitor sections, if appropriate.

Assigned personnel must supervise the crowd and immediately address situations before they fester or grow in intensity. Set limits and provide options to help de-escalate high emotions. If not managed, angry fans may escalate into untenable and disruptive situations.⁵² Enforce the code of conduct if necessary, including removal of fans. Consider conducting a follow-up meeting to help prevent future problems.

Establish and post attendee expectations, including announcements over the public address system. Supervise the crowd. When necessary, speak with problem individuals to de-escalate high emotions before the situation worsens.

After the Event

Control crowd movement and help move attendees to the exits. Monitor exits and parking areas.

Debrief personnel, collect equipment, and examine how the safety and security plan can be improved for the next event.

CRISES IN NON-TRADITIONAL ENVIRONMENTS RESOURCES

- Sporting Event Safety: <https://www.ncs4.com/researchportal/publications>
- FEMA
 - National Incident Management System and Incident Command System courses for schools: <https://training.fema.gov/programs/emischool/emischool.aspx/>
 - Multihazard Emergency Planning for Schools Toolkit: <https://training.fema.gov/programs/emischool/el361toolkit/start.htm>

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SCHOOL BOARD RESPONSIBILITIES

The school board or governing body of a private school is responsible for setting the leadership standard for their schools—including the school safety standard as required by Wisconsin Statutes.

REVIEW OF SAFETY PLANS

Wisconsin Statute § 118.07(4) requires that the board or governing body have a school safety plan meeting specified criteria; review the safety plan at least once every 3 years, and approve that safety plan. Along with other required information, the board or governing body must also file a copy of the safety plan with the Office of School Safety.

DRILL REVIEWS

Wisconsin Statute § 118.07(4)(cp) requires schools to conduct at least one annual drill in the proper response to a school violence event, and submit a brief written summary to their school board or private school's governing body within 30 days of the drill. Schools may use this document to do so: https://www.doj.state.wi.us/sites/default/files/written_evaluation_example.docx.

The board or governing body must review these written evaluations and certify that review to the Office of School Safety.

Wis. Stat. § 118.07(4) Health and safety requirements (excerpted)

- (a) Each school board and the governing body of each private school shall have in effect a school safety plan.
- (b) A school safety plan shall be created with the active participation of appropriate parties, as specified by the school board or governing body of the private school... Before creating or updating a school safety plan, a school board or governing body of a private school shall, in consultation with a local law enforcement agency, conduct an on-site safety assessment of each school building, site, and facility that is regularly occupied by pupils. The on-site assessment shall include playgrounds, athletic facilities or fields, and any other property that is occupied by pupils on a regular basis.
- (c) The school board or governing body of the private school shall determine which persons are required to receive school safety plan training and the frequency of the training. The training shall be based upon the school district's or private school's prioritized needs, risks, and vulnerabilities.
- (cf) Upon the creation of a school safety plan under par. (a) and upon each review of a school safety plan under par. (d), a school board shall submit a copy of the most recent blueprints of each school building and facility in the school district to each local law enforcement agency with jurisdiction over any portion of the school district and to the office of school safety. Upon the creation of a school safety plan under par. (a) and upon each review of a safety plan under par. (d), a governing body of a private school shall submit a copy of the most recent blueprints of the private school and all of its facilities to each local law enforcement agency with jurisdiction over the private school and to the office of school safety.
- (cp) Each school board and the governing body of each private school shall ensure that, at each school building regularly occupied by pupils, pupils are drilled, at least annually, in the proper response to a school violence event in accordance with the school safety plan in effect for that school building. The person having direct charge of the school building at which a drill is held under this paragraph shall submit a brief written evaluation of the drill to the school board or governing body of the private school within 30 days of holding the drill. The school board or governing body of the private school shall review all written evaluation submitted under this paragraph.
- (d) Each school board and the governing body of each private school shall review and approve the school safety plan at least once every 3 years after the plan goes into effect.
- (e) Before January 1, 2019, and before each January 1 thereafter, each school board and the governing body of each private school shall file a copy of its school safety plan with the office of school safety. At the time a school board or governing

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body files a school safety plan, the school board or governing body shall also submit all of the following to the office of school safety:

1. The date of the annual drill or drills under par. (cp) held during the previous year.
2. Certification that a written evaluation of the drill or drills under par. (cp) was reviewed by the school board or governing body under par. (cp).
3. The date of the most recent school training on school safety required under par. (c) and the number of attendees.
4. The most recent date on which the school board or governing body reviewed and approved the school safety plan.
5. The most recent date on which the school board or governing body consulted with a local law enforcement agency to conduct on-site safety assessments required under par. (b).

SCHOOL BOARD RESOURCES

- Wisconsin Statute § 118.07(4): [https://docs.legis.wisconsin.gov/document/statutes/118.07\(4\)](https://docs.legis.wisconsin.gov/document/statutes/118.07(4))
- Office of School Safety: School Safety Drill reporting: <https://www.doj.state.wi.us/office-school-safety/school-safety-resources>

EMERGENCY OPERATIONS PLANNING

"An emergency operations plan is a document that:

- Assigns responsibility to organizations and individuals for carrying out specific actions at projected times and places in an emergency that exceeds the capability or routine responsibility of any one agency.
- Sets forth lines of authority and organizational relationships, and shows how all actions will be coordinated.
- Describes how people and property will be protected in emergencies and disasters.
- Identifies personnel, equipment, facilities, supplies, and other resources available--within the jurisdiction or by agreement with other jurisdictions--for use during response and recovery operations.
- Identifies steps to address mitigation concerns during response and recovery activities."⁵³

PREPaRE

The Wisconsin Safe and Healthy Schools Center (WISH) provided this information on PREPaRE, and offers PREPaRE training courses around the state.

The PREPaRE curriculum has been developed by the National Association of School Psychologists (NASP). The training curriculum includes two core workshops that can be conducted together or separately. The Wisconsin Safe & Healthy Schools Center is available to provide PREPaRE training.

PREPaRE 1: Crisis Prevention and Preparedness: Comprehensive School Safety Planning

This 1-day workshop provides school-based mental health professionals, administrators, security professionals, and other educators the knowledge and resources to help them establish and sustain comprehensive school safety and crisis prevention and preparedness efforts. With updated research and strategies, this workshop makes a clear connection between ongoing school safety and crisis preparedness. It also will emphasize the unique needs and functions of school teams and the steps involved in developing these teams, including a model that integrates school personnel and community provider roles. The workshop also explores how to prepare for school crises by developing, exercising, and evaluating safety and crisis plans.

PREPaRE 2: Crisis Intervention and Recovery: The Roles of School-Based Mental Health Professionals

This 2-day workshop provides school-based mental health professionals and other school crisis intervention team members with the knowledge necessary to meet the mental health needs of students and staff following a school-associated crisis event. With updated research and crisis intervention strategies, this workshop teaches participants how to prevent and prepare for psychological trauma, helps to reaffirm both the physical health of members of the school community and students' perceptions that they are safe and secure, evaluates the degree of psychological trauma, responds to the psychological needs of members of the school community, and examines the effectiveness of school crisis intervention and recovery efforts. This workshop is an excellent course for all mental health professionals in your district who provide mental health crisis intervention services.

EOP REQUIREMENTS

2017 Wisconsin Act 143 updated the requirements for school EOPs ("safety plans"). Under Wisconsin Statutes, every school board and private school must have a school safety plan that meets the following standards.

Wis. Stat. § 118.07(4) Health and safety requirements (excerpted)

- (a) Each school board and the governing body of each private school shall have in effect a school safety plan.
- (b) A school safety plan shall be created with the active participation of appropriate parties, as specified by the school board or governing body of the private school. The appropriate parties may include the department of justice, local law enforcement officers, fire fighters, school administrators, teachers, pupil services professionals, as defined in s. 118.257(1)(c), and mental health professionals. Before creating or updating a school safety plan, a school board or governing body of a private school shall, in consultation with a local law enforcement agency, conduct an on-site safety assessment of each school building, site, and facility that is regularly occupied by pupils. The on-site assessment shall include playgrounds, athletic facilities or fields, and any other property that is occupied by pupils on a regular basis.
- (bm) A school safety plan shall include all of the following:
 - 1. An individualized safety plan for each school building and facility that is regularly occupied by pupils. The individualized safety plan shall include any real property related to the school building or facility that is regularly occupied by pupils.
 - 2. General guidelines specifying procedures for emergency prevention and mitigation, preparedness, response, and recovery.
 - 3. Guidelines and procedures to address school violence and attacks, threats of school violence and attacks, bomb threats, fire, weather-related emergencies, intruders, parent-student reunification, and threats to non-classroom events, including recess, concerts and other performances, athletic events, and any other extracurricular activity or event.
 - 4. The process for reviewing the methods for conducting drills required to comply with the plan.
- (cf) Upon the creation of a school safety plan under par. (a) and upon each review of a school safety plan under par. (d), a school board shall submit a copy of the most recent blueprints of each school building and facility in the school district to each local law enforcement agency with jurisdiction over any portion of the school district and to the office of school safety. Upon the creation of a school safety plan under par. (a) and upon each review of a safety plan under par. (d), a governing body of a private school shall submit a copy of the most recent blueprints of the private school and all of its facilities to each local law enforcement agency with jurisdiction over the private school and to the office of school safety.
- (cm) Neither a school board nor a governing body of a private school may include in a school safety plan any of the following:
 - 1. A requirement for an employee to contact a school administrator, school official, or any other person before calling the telephone number "911."
 - 2. A prohibition against an employee reporting school violence or a threat of school violence directly to a law enforcement agency.
 - 3. A prohibition against an employee reporting a suspicious individual or activity directly to a law enforcement agency.
- (cp) Each school board and the governing body of each private school shall ensure that, at each school building regularly occupied by pupils, pupils are drilled, at least annually, in the proper response to a school violence event in accordance with the school safety plan in effect for that school building. The person having direct charge of the school building at which a drill is held under this paragraph shall submit a brief written evaluation of the drill to the school board or governing body of the private school within 30 days of holding the drill. The school board or governing body of the private school shall review all written evaluation submitted under this paragraph. A drill under this paragraph may be substituted for a school safety drill required under sub. (2)(a).
- (d) Each school board and the governing body of each private school shall review and approve the school safety plan at least once every 3 years after the plan goes into effect.

PERSONS WITH DISABILITIES

School plans should consider the unique situations, needs, and abilities of all students and staff in the school. School safety plans must be individualized to the building level, and should plan for all students and staff in that building.

PUBLIC RECORD REQUESTS

Public schools may receive requests for copies of their EOP. Schools should consult with their public records specialist and perform a balancing test taking into account any information vital to school district safety and security. The Wisconsin Department of Justice, Office of Open Government has issued a letter regarding this case-by-case balancing test, available here: <https://www.doj.state.wi.us/sites/default/files/school-safety/Office-Of-Open-Government-grant-application-records.pdf>.

School officials need a working knowledge of the Incident Command System to effectively manage large school crisis events, whether they be the result of violence, flooding, structure fire, or other calamity

INCIDENT COMMAND SYSTEM

All emergency responders – law enforcement, fire, and EMS – utilize the Incident Command System (ICS) in emergency situations. Originally developed to manage large California wildfires, the system has proved necessary to manage large, complex, and multi-faceted events. School officials need a working knowledge of this system in order to manage large school crisis events, whether they be the result of violence, flooding, structure fire, or other calamity.⁵⁴

"The U.S. Departments of Homeland Security and Education recommend all key personnel involved in school emergency management and incident response take the NIMS, ICS, and NRF training courses and support the implementation of NIMS. Currently, key personnel are required to complete four courses in order for an individual or organization to be considered NIMS compliant through FY 2007.

- IS-100.c: Introduction to the Incident Command System, ICS 100
- IS-200.b: ICS for Single Resources and Initial Action Incidents
- IS-700.b: An Introduction to the National Incident Management System
- IS-800.c: National Response Framework, an Introduction

The following additional courses are recommended for leadership personnel:

- ICS 300 Intermediate Incident Command System
- ICS 400 Advanced Incident Command System"⁵⁵

FEMA offers additional school-related courses such as Emergency Planning for Schools, Preparing for Emergencies: What Teachers Need to Know, and more. Information on all of the FEMA courses intended for school personnel is available here: <https://training.fema.gov/programs/emischool/emischool.aspx/>.

EMERGENCY OPERATIONS PLANNING RESOURCES

- Wisconsin School Safety Coordinators Association EOP template: <http://www.wssca.org/resources/Documents/2019/WSSCA%20EOP%20Template%20Model%2011092018.docx>
- Office of School Safety model emergency operation plans (in development)
- Readiness and Emergency Management for Schools (REMS)
 - Creating Emergency Management Plans: <https://rem.ed.gov/docs/CreatingPlans.pdf>
 - Guide for developing High-Quality School Emergency Operations Plans: https://rem.ed.gov/docs/REMS_K-12_Guide_508.pdf
 - REMS Tool Box: <https://rem.ed.gov/ToolBox.aspx>
- FEMA
 - National Incident Management System and Incident Command System courses for schools: <https://training.fema.gov/programs/emischool/emischool.aspx/>
 - Multihazard Emergency Planning for Schools Toolkit: <https://training.fema.gov/programs/emischool/el361toolkit/start.htm>
- Campus Resilience Program Exercise Starter Kits: <https://www.dhs.gov/exercise-starter-kits-esks>
- PREPaRE
 - Curriculum information: <https://www.nasponline.org/professional-development/prepare-training-curriculum>
 - Wisconsin Safe & Healthy Schools Center: <https://www.wishschools.org/resources/SchoolSafety.cfm>
- Wisconsin Emergency Management: <https://dma.wi.gov/DMA/wem/>
- Wisconsin Statute § 118.07(4): [https://docs.legis.wisconsin.gov/document/statutes/118.07\(4\)](https://docs.legis.wisconsin.gov/document/statutes/118.07(4))

APPENDIX A: LESSONS LEARNED FROM THE EXPERIENCE OF OTHERS – WHAT WOULD YOU DO?

CASE STUDY #1 – MAN KNOCKING ON DOOR

This case study is a real incident. It is not presented to find fault with any actions of the innocent victims. Indeed, we honor the victims of these incidents by learning from their experience and using their hard-won lessons to prevent trauma in the future. It would be a great failure on our part to disrespect their sacrifices by failing to learn from this crisis to help prevent similar incidents in the future.

Wisconsin

Summary of what happened: School staff opened the door to better explain to the man to go to the front entrance. They discovered a shirtless man with a dog, who barged into the school where staff confronted him. The man pulled a fire alarm and demanded people leave their classrooms, and yelled, “Come out! Let’s see who all the sinners are! I’m counting down and when I get to zero I will unleash my dog.” Staff members activated a school lockdown and called law enforcement. Officers arrived and took the man into custody.⁵⁶

These are selected excerpts from the criminal complaint filed against the suspect:

On Monday October 1, 2018 G.C. was working in the School District Administrative Offices. G.C. told Officer Lindsey that a man, later identified as Colton Mather, the defendant, rang the bell at the door to the Administrative Offices. G.C. and G.C.’s co-worker J.C. both told the defendant he was at the wrong door and needed to go to the other entrance for students. The defendant insisted he was at the correct door and demanded to be let in. The defendant was difficult to understand over the intercom system. G.C. went to talk to the defendant at the door. When G.C. opened the door to talk to the defendant, the defendant squared his body toward her and walked past her into the building. G.C. believed that the defendant was on some sort of drug or had mental health issues. The defendant had a German Shepard dog with him when he came into the building.

On Monday October 1, 2018 D.M. told Detective Hefty he saw a shirtless man in the hallway with his dog. D.M. heard the man say things about the real true God. He also heard the man counting down from 3 and saying if he got to zero, he would let the dog loose. He saw the man walk down the hallway toward the cafeteria. The man walked from the Administrative Office, past the School Office and into the school cafeteria. The fire alarm on the far south hallway by the Gymnasium was pulled.

On Monday October 1, 2018 at approximately 2:43pm the Police Department received multiple 911 calls reporting that a man and his dog entered the Elementary School. Dispatch was informed that the man was threatening to release his dog inside the school. The school was placed on Lockdown. Police Officers Lindsey and Gonzalez as well as Lt. Sachse and Detective Hefty went to the school in response.

Lt. Sachse and Officer Gonzalez went into the school through the South Entrance. They were informed the last place the defendant was known to be was the cafeteria. The fire alarm was activated and going off. Lt. Sachse and Officer Gonzalez began to look for the defendant. Officer Gonzalez encountered the defendant first. The defendant was standing in the hallway, without his shirt on, holding the leash for a dog; the dog was on the leash. Officer Gonzalez ordered the defendant to the ground and drew his Taser. The defendant let go of the leash and got onto his stomach. Officer Lindsey

arrived and took the dog's leash and handed the leash to Officer Hefty. The dog was a large German Shepard. Lt. Sachse, who also arrived on scene, assisted Officer Lindsey in securing the defendant.

The defendant said he was there to repent for his sins. He further said he wanted to have contact with Dr. F., his old superintendent. The defendant claimed Dr. F was a robot.

K.L. called the Police Department because she was missing her dog and could not get ahold of her boyfriend, Colton Mather. K.L. said she dropped the defendant off at Elementary School at 2:30pm to pick up her daughter. K.L. said the defendant has Manic Bipolar and thought it was going to be a weird day with him. She said the defendant posted a video of himself putting a cigarette out on his arm. The defendant also abandoned his vehicle and put a witches [sic] broom into the gas tank.

Officer Sachse remained at the school as the lockdown was lifted. He observed children were upset and crying and appeared scared. Several staff members were also crying and appeared to be scared.

Detective Courtier worked with school staff after the lockdown. He noted that Elementary school is a two story building. On October 1 at the time the lockdown occurred there were over 360 people in the school including staff and children. The children were in Kindergarten through fifth grade. Det. Courtier collected e-mailed witness statements from teachers in the school.

M.T., fifth grade teacher, reported that her students heard a man whistling a song from the movie "Kill Bill." Complainant knows the Kill Bill movies are very violent and bloody films. K.T. heard the man say something similar to: "There's blood everywhere, just look at all that blood. Blood everywhere." K.T. also heard the man yell something about God and something sexual. K.T. moved her kids further away from the hallway wall when she heard that. K.T. heard the man yell "Come out! Come out!" when he pulled the fire alarm.

K.S., a special education teacher, heard a man yelling "lock down" in her hallway at approximately 2:40pm. She closed her door (which was locked), curtained her window to the hallway, turned off her lights and had her students hide under her desk. She then heard an announcement over the PA that, "The school is on lock down." After that, K.S. heard a man's voice that sounded like it was just outside of her classroom. The man was yelling and trying to lure K.S. and her students out of the classroom. He yelled, "In the name of Jesus Christ, come out!" "Let's see who all the sinners are!" "I'm counting down and when I get to zero I will unleash my dog and the rest will be taken care of. 3, 2, 1, 0!" K.S. could hear the dog's loud panting and the dog's claws on the hallway floor. K.S. reported being terrified.

M.D., an administrative assistant in the Elementary School office, reported hearing a man yelling about Jesus our Lord and saying he was going to kill all of the sinners. She heard the man counting down. He said he was going to unleash his dog and then kill them. He was walking down the hall yelling. She also heard him whistling something creepy.

E.B., a fourth grade teacher, reported her students heard sexual things. She heard the man whistling a creepy song. When the fire alarm went off, the kids heard the man yelling to leave the classrooms, there was a fire and to get out. She and her kids also heard him talking about blood on the floor and there being blood everywhere. The man turned her door knob, but her door was barricaded. She could hear the dog right outside her door. The kids kept asking if they were going to get shot.

A.L., a speech pathologist, reported she went into E.B.'s classroom to pick up one of her students when the announcement about the lockdown occurred. While the class was in lockdown, A.L. heard whistling and the rustle of the dog. The man was saying, "Come out, come out wherever you are." The children were terrified.

Elementary School Principal D.G. was in the IMC when he received word that a man forced his way in to the school from the school secretary over the walkie talkie. D.G. ran to the office. He saw J.D. yell to call 911 and lock down. D.G. saw

the man walk out of the teacher lounge with his German Shepard. The man had no shirt on and it appeared he had cargo shorts on. D.G. heard the man saying something like this was going to end with a lot of blood. The man was yelling about God and the devil. The man mentioned several times how he was going to release the dog and there would be a lot of blood.

J.D., school district manager, reported J.C. came into the office and said a weird guy came into the school with a dog. J.D. and J.C. went to investigate. They found the man in front of a cubicle in the school office. J.D. asked the man if he needed anything. The man told J.D. to leave or the man would let the dog go at J.D. As the dog appeared friendly to J.D., J.D. asked the man, "What do you mean?" The man said something like: "You need to leave or I will let this dog go." The dog started to growl. J.D. and J.C. backed out into the hallway and yelled, "Lockdown! Call 911!"

J.D. looked back into the office and yelled for them to lockdown again. He went into the administrative office suite and told everyone to lock down. He got his emergency bag and hammer. J.D. stood by the fax machine and sent out a CrisisManager alert. J.D. saw the intruder down the hallway come out of the staff lounge no longer wearing a shirt. The man stood at the door on the side of the library telling people to come out. The man then rounded the corner and not much later the fire alarms went off. J.D. told the people in the office to get out.

J.C., building and grounds director, reported that at approximately 2:45 he was meeting with J.D. in the Administrative Offices when J.C. told him a man got into the building with a dog. He and J.D. got up and saw the man and a dog walking into a side office room in the Elementary School. They then saw the man walking away from him. The man then turned around and started to come toward J.C. and J.D. The man had one hand inside of his grey hooded sweatshirt pocket, the man's other hand was holding onto a dog's leash. The man had something in his pocket pointed toward J.C. and J.D. that J.C. believed may be a weapon. The man had a look in his eyes that reflected a mental numbness that caused J.C. to believe something was not mentally right with the man, like something was switched off.

The man said something like: "My dog will hurt you if I let him go. I will release my dog if you do not back up and get out." J.D. asked the man, "Why, why are you doing this?" The man again said if J.C. and J.D. did not leave the room, he would release his dog. The dog started to bark loudly. J.C. did not believe the dog was in attack mode, rather the dog appeared confused and scared. The man still appeared to have some kind of weapon in his sweatshirt pocket. J.C. and J.D. backed off into the hallway. J.D. told J.C. to call 911 and J.D. ran down the hallway yelling, "Lockdown! Lockdown!" J.C. ran into the office, called 911 and armed himself with a hammer. J.C. told 911 something similar to: "My name is J.C. and we have an active intruder in Elementary [address] and we need police here immediately. We are on Lockdown and he is threatening to release his rather large dog on staff and students. I don't know if he has a weapon but he was concealing something in his hoodie that looked like a weapon."

More information: https://www.dailyunion.com/news/man-dog-threaten-luther-elementary/article_4a8429b4-be1b-5a94-b56f-060e03a69010.html

CASE STUDY #3 – EFFECTIVENESS OF WELL-PRACTICED EMERGENCY PLAN

This case study is a real incident. It is not presented to find fault with the participants or victim. Indeed, we honor them by learning from their experience and using their lessons to save more lives in the future.

Palmyra, Wisconsin

In this event a teacher suffered a medical emergency. The Palmyra Public Safety Department (a combined police/fire/EMS service) reports that the school's emergency response plan was incredibly effective. Before emergency first responders arrived the students were removed from the room, the school was put on HOLD to keep hallways clear, and school personnel were stationed at key locations to guide emergency responders to the exact classrooms. CPR was begun within one minute of the patient's collapse and the teacher's heart was defibrillated with the on-site defibrillator even before emergency responders arrived.

The Palmyra Chief couldn't say enough good things about the quality and effectiveness of the school's emergency response. It saved that teacher's life.

More information: https://www.dailyunion.com/news/school-nurse-team-save-life/article_d0e6202f-0a94-5099-978a-7ba3a96f6a34.html

Gretchen said that it's great to know the school staff is prepared for such an emergency. She is heartened by the fact that a team of staff members are willing to step away from their regular responsibilities to voluntarily assist in an emergency and that the district has invested in the training and equipment to make this kind of save possible. [Daily Union](#), January 28, 2019

APPENDIX B: ILLUSTRATIVE SCHOOL SHOOTINGS

These cases are not presented to find any fault with the actions of innocent victims. Indeed, we honor the victims of these incidents by learning from their experiences and using their hard-won lessons to prevent trauma in the future. It would be abject failure on our part to disrespect their sacrifices by failing to learn from the incident to help prevent similar incidents in the future. These conclusions are not exhaustive, and each school and situation is different.

1. Bath, Michigan (1927)
 - a. Deadliest school attack in U.S. history
 - b. Attacks are not a recent phenomenon
2. Jonesboro, Arkansas (1998)
 - a. Two juvenile attackers stole weapons from relative, pulled fire alarm, and shot evacuees from a distance
 - b. Used channeling to assemble victims at pre-planned location
3. Columbine, Colorado (1999)
 - a. This attack highlighted, in a very public way, deficiencies in police response to ongoing mass murder. It sparked a sea change in law enforcement philosophy, principles, and tactics. In the twenty years since law enforcement tactics have evolved through multiple generations.
 - b. Most attacks conducted by lone persons
 - c. Although it was a school shooting, it is an example of an attempted bombing
 - d. Cameras cannot prevent attacks
 - e. Presume the attacker knows the school's plan
 - f. The ability to provide medical care while in lockdown can be a lifesaver
 - g. This event started with a gunfight with the SRO. SROs should be uniformed, armed, and wear a bullet-resistant vest.
 - h. Every school should have a threat assessment team
 - i. *Report of Governor Bill Owens' Columbine Review Commission*, May 2001.
<http://hermes.cde.state.co.us/drupal/islandora/object/co%3A2067>
4. Red Lake, Minnesota (2005)
 - a. This is the only known incident where an attacker was able to breach and enter a locked classroom. He didn't breach the door – he entered through the broken classroom window.
 - b. Metal detectors were in use at the school, but were staffed by unarmed security guards
 - c. Weapon was taken from a murdered law enforcement relative. When a parent or custodial adult is found murdered & their juvenile is missing, consider whether this could be a precursor to a school attack (Sandy Hook)
5. Cazenovia, Wisconsin (2006)
 - a. Immediate actions can save lives (custodian was able to disrupt and partially disarm attacker)
 - b. Presume attackers may have more than one weapon
 - c. Attacks can happen to any size school, urban, suburban, or rural
6. Virginia Tech (2007)
 - a. Report suspicious activity and/or signs of preparation or rehearsal, such as doors found chained shut
 - b. Example of barricade use to slow law enforcement entry (also used in PA school shooting)
 - c. Active response by innocents, such as barricading or flight, can lead to lower casualties
 - d. Confusion and differing [incorrect] interpretations of HIPAA and FERPA limited information sharing. "...although participants...were aware of both HIPAA and FERPA, there was significant misunderstanding about the scope and application of these laws and their interrelation with state laws. ...participants reported circumstances in

which they incorrectly believed that they were subject to liability or foreclosed from sharing information under federal law. Other participants were unsure whether and how HIPAA and FERPA actually limit or allow information to be shared and unaware of exceptions that could allow relevant information to be shared.”⁵⁷

- e. *Mass Shootings at Virginia Tech – Report of the Review Panel*, August 2007, <https://scholar.lib.vt.edu/prevail/docs/VTReviewPanelReport.pdf>, and *Mass Shootings at Virginia Tech – Addendum to the Report of the Review Panel*, November 2009, <https://scholar.lib.vt.edu/prevail/docs/April16ReportRev20091204.pdf>
7. Sandy Hook, Connecticut (2012)
 - a. Keep classroom doors locked at all times. In a crisis there may not be time to lock them (especially if the key is located across the room, or you need to lock the door from the hallway).
 - b. Every staff member should have authority to initiate lockdown. The custodian did it in this case.
 - c. Neither the office staff nor administrators may be available during or after the crisis. In this case officer personnel were unable to get to the public address system, and the school principal was killed confronting the attacker near the front office.
 - d. The weapon was taken from the murdered mother. When a parent or custodial adult is found murdered & their juvenile is missing, consider whether this could be a precursor to a school attack (Red Lake)
 - e. *Final Report of the Sandy Hook Advisory Commission*, March 6, 2015, http://www.shac.ct.gov/SHAC_Final_Report_3-6-2015.pdf
8. Antigo, Wisconsin (2016)
 - a. Attacks are happening outside “traditional” classroom times – before and after school
9. Parkland, Florida (2018)
 - a. Can be surprisingly difficult to hear or recognize gunshots within the same building
 - b. Train and rehearse staff response to security breach and crisis
 - c. School should have ability to “reverse evacuate” into classrooms during a crisis
 - d. *Marjory Stoneman Douglas High School Public Safety Commission, Initial Report* [draft], January 1, 2019. <http://www.fdle.state.fl.us/MSDHS/Meetings/2018/December-Meeting-Documents/Marjory-Stoneman-Douglas-High-School-Public-Draft1.aspx>

APPENDIX C: AVERTED WISCONSIN SCHOOL ATTACKS

Wisconsin has had a tragic number of mass murder events. However, several potential school attacks have been averted by alert students, staff, or members of the public. Some of the below incidents resulted in criminal charges; others in mental health services; while the disposition of others is not clear due to reporting and/or juvenile justice privacy laws.

POTENTIALLY AVERTED ATTACKS

- November 1998, Burlington
 - *Burlington plot suspects accept plea deal*, https://journaltimes.com/news/local/burlington-plot-suspects-accept-plea-deal/article_b7d8a8d7-ab1f-5210-bb11-0e09e1813878.html
 - Multiple boys pled no contest to charges related to a plot to kill the high school principal, assistant principal, and police liaison officer.
- September 2006, Green Bay
 - *Student talks of breaking up bomb plot*, http://www.nbcnews.com/id/14937309/ns/us_news-crime_and_courts/t/student-talks-breaking-bomb-plot/
 - Teens pled no contest to conspiracy charges to commit first-degree murder. The scheme was uncovered when another teen informed an associate principal about the plot. Among the weapons recovered were 20 home-made bombs.
- May 2013, Wauwatosa
 - *Report details bomb plot at Wauwatosa school*, <https://www.channel3000.com/news/local-news/report-details-bomb-plot-at-wauwatosa-school/161856513>
 - Students referred to both Sandy Hook and the Boston marathon bombing, and made four different plans and some bomb-making materials. Plans appear to have been interdicted at the discussion stage.⁵⁸
- September 2015, DeForest
 - *Police seeking third person in DeForest school attack plot*, https://madison.com/wsj/news/local/crime-and-courts/police-seeking-third-person-in-deforest-school-attack-plot/article_d5c7ddb5-ede5-5aeb-8254-bb4fba74ac1.html
 - Students allegedly planned to bomb and shoot students in the school.
- November 2015, Oconomowoc
 - *Oconomowoc police chief upset with recent school shooting threats*, <https://wtaq.com/news/articles/2015/dec/28/oconomowoc-police-chief-upset-with-recent-school-shooting-threats/>
- September 2016, Sun Prairie
 - *Student brought gun to school after posting threat, Sun Prairie police say*, https://madison.com/wsj/news/local/crime-and-courts/student-brought-gun-to-school-after-posting-threat-sun-prairie/article_f169cc25-8bf6-59e8-9512-3e62ed0f2d02.html
 - A student allegedly brought a gun and ammunition to school after posting a threatening message on social media.

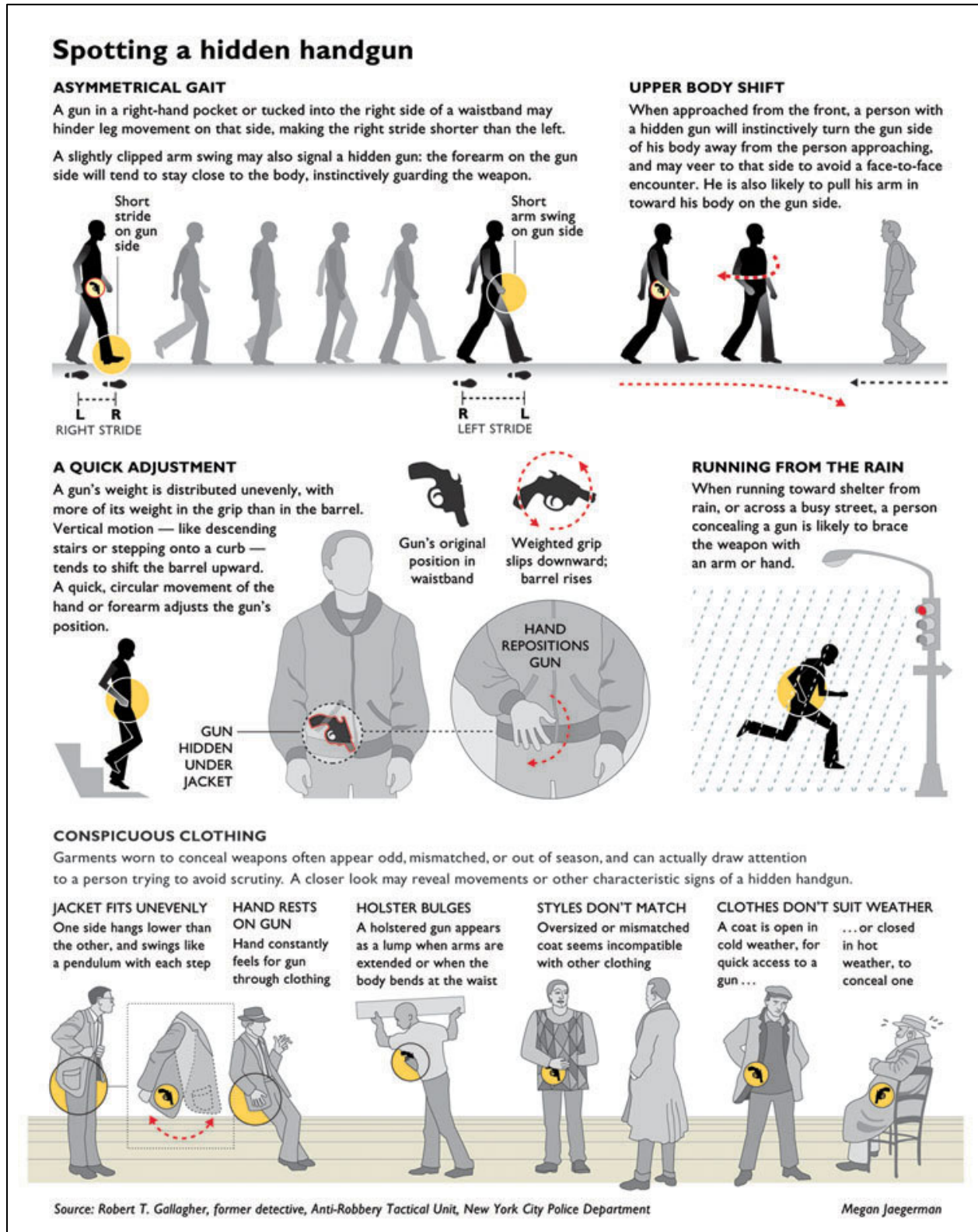
2018-2019 SCHOOL THREATS AND CRITICAL INCIDENTS

According to publically-available media reports, there have been at least 36 critical school-related incidents in Wisconsin from October 2018 to March 2019.

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APPENDIX D: VISUAL SCREENER RESOURCES

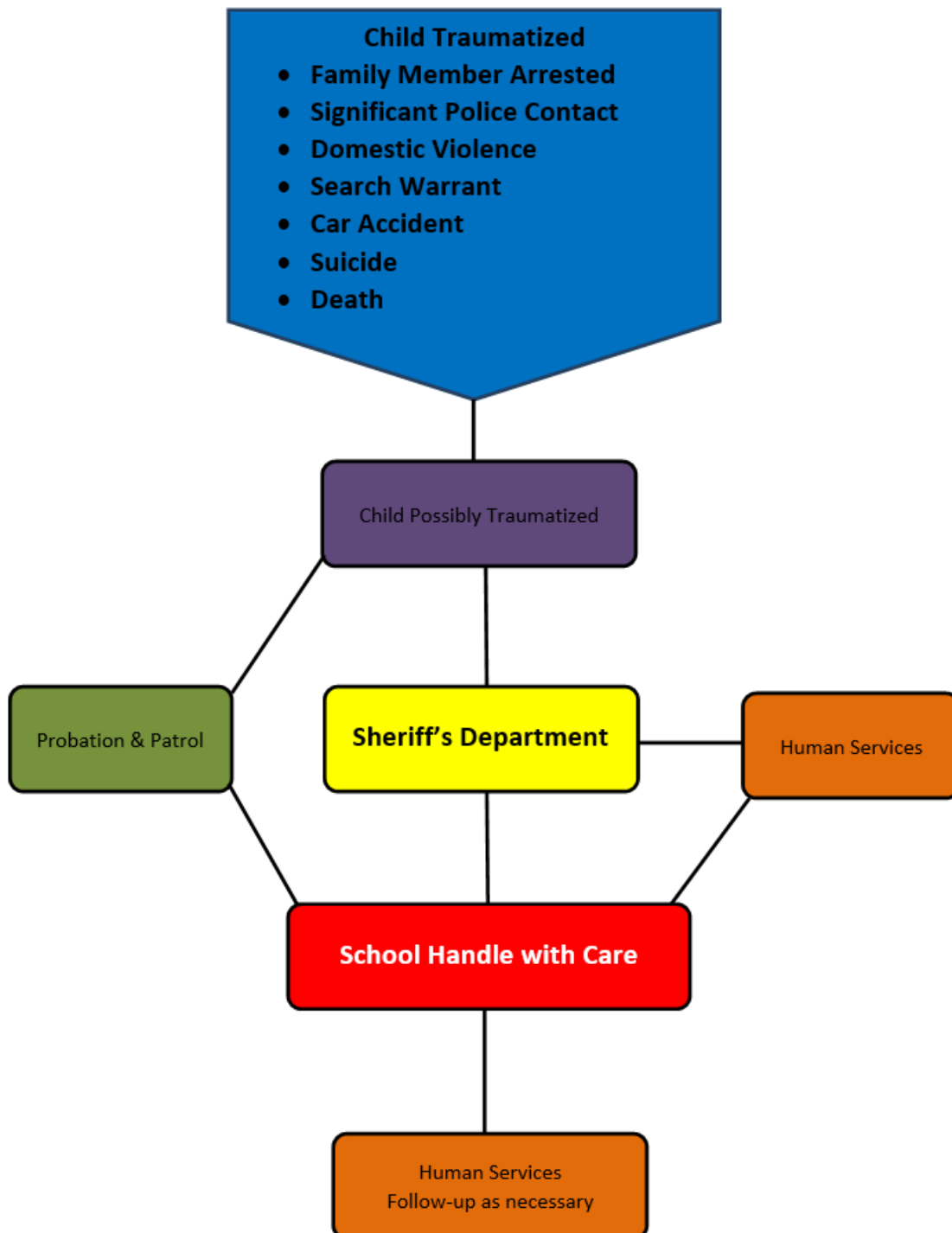
Figure 9: Spotting a hidden handgun, from Beautiful Evidence.
Used with permission of Carolyn Williams, Graphics Press LLC, Cheshire CT.



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APPENDIX E: LAW ENFORCEMENT INFORMATION SHARING

Courtesy of the Kewaunee County Sheriff's Office





Promoting Mental Health in Young Children

Date: _____

Child's Name(s) and Age(s): _____

Address: _____

School: _____

Relationship to individuals involved: _____

Present during the incident: Yes No

Report Filed: Yes No

Police Incident Number:

Human Services Notified: Yes No

Handle with Care Notice sent to School: Yes No

Information Passed on _____

APPENDIX F: EXAMPLE SPECIAL EVENT/AFTER HOURS EMERGENCY PLAN

The fields below are merely examples of roles, responsibilities, and resources that may suitable for an event. The plan should be expanded or contracted to reflect the site and risk assessments; nature of event; identified needs; and circumstances of each event.

Name and Date of Event:

Event/Practice Venue:

Street Address, City, GPS coordinates:

Organizer/Coordinator:

Crisis Incident Commander, Command Post Location, & Contact information:

Reviewing/Approving Administrator:

Resources:

Location of First Aid Kit, Epinephrine, and/or Defibrillator:

Location of Weather Shelter & Who Has Keys/Access:

Other Resources Needed (EMS/Law Enforcement/other):

Emergency Number (if not 911):

Nearest Accessible Phone (if poor cell service):

Location Where EMS Should Report (if not pre-stationed at event):

Location of Student/Staff/Attendee Allergies/Pre-Existing Conditions/Waivers/Permission Forms:

Personnel Pre-Event Tasks:

Site & Risk Assessment:

Conducts Safety/Facility Inspection:

Conducts Staff Briefing:

Conducts Emergency Procedure Briefing for Attendees & Students:

Sets Up Security Camera(s):

Personnel Crisis Tasks:

Provides Primary Medical Care:

Calls EMS:

Admits EMS to Facility:

Calls Parents:

Travels w/Injured Student:

Manages Remainder of Event:

Follows-Up w/Parents:

Notifies Administration and Completes Incident Report/Documentation:

<u>Role</u>	<u>Location</u>	<u>Name</u>	<u>Contact</u>
Crisis Incident Commander	Stadium Box Office	Susan Smith	(608) 555-5555 Radio Channel #1
Team Coach	Sidelines	Fred Fitzgerald	(608) 555-1234
Team Assistant Coach	Sidelines	Robert Robertson	(608) 555-2345
School Nurse	Sidelines	James Johnson	(608) 555-3456 Radio Channel #1
Visual Screener #1	Main Gate	John Johansson	(608) 555-4567 Radio Channel #1
Visual Screener #2	Main Gate	Rebecca Roberts	(608) 555-5678 Radio Channel #1
Field Supervisor #1	Visitor Stands	Bob Buchanan	(608) 555-6789 Radio Channel #2
Field Supervisor #2	Home Stands	Charles Cook	(608) 555-7890 Radio Channel #2
Errands/Runner/Fill-In #1	Stadium Box Office	Dave Davidson	(608) 555-8901 Radio Channel #2
Errands/Runner/Fill-In #2	Main Gate	Aaron Adamson	(608) 555-9012 Radio Channel #2
Security Camera Operator #1	Main Gate		

The above roster is merely an example of roles, responsibilities, and numbers of personnel that may suitable for a particular event. The roles, responsibilities, and roster should be expanded or contracted to reflect the site and risk assessments; nature of event; identified needs; and special circumstances of each specific event.

END NOTES

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- ¹ https://www.cdc.gov/healthyyouth/protective/pdf/connectedness_administrators.pdf
- ² <https://dpi.wi.gov/rti/positive-behavioral-intervention-supports>
- ³ Russell, S. T., McGuire, J. K., Laub, C., & Manke, E. (2006). *LGBT student safety: Steps schools can take*. (California Safe Schools Coalition Research Brief No. 3.) San Francisco: California Safe Schools Coalition
- ⁴ Bowser, John, James D. Larson, Amy Bellmore, Chelsea Olson, and Felice Resnik. "Bullying victimization type and feeling unsafe in middle school." *The Journal of School Nursing* (2018): 1059840518760983.
- ⁵ Licensed professionals are also mandatory reporters, as discussed elsewhere in this Framework.
- ⁶ <https://www.activeresponsetraining.net/when-do-school-shootings-occur>
- ⁷ Final Report of the Sandy Hook Advisory Commission, March 6, 2015, http://www.shac.ct.gov/SHAC_Final_Report_3-6-2015.pdf, recommendation 6.1, p. 55.
- ⁸ *Prior Knowledge of Potential School-Based Violence: Information Students Learn May Prevent a Targeted Attack*, U.S. Secret Service and U.S. Department of Education, May 2008, p. 4, and *A study of the Pre-Attack Behaviors of Active Shooters in the United States Between 2000 and 2013*, U.S. Department of Justice, Federal Bureau of Investigation, June 2018.
- ⁹ *Wis. Stat. § 948.55*, *Leaving or storing a loaded firearm within the reach or easy access of a child*.
- ¹⁰ A gunman was allowed into this school building, <https://www.ajc.com/news/mcnair-gunman-serve-years-for-school-invasion/OeEkEB5eBO8NYLljx2Xw6H/>, and a member of the media snuck into a Wisconsin school when a parent held the door for him, to gain "insider information" during the school's national-profile incident.
- ¹¹ Verbal presentation, Safe and Sound Schools, 2018.
- ¹² <https://www.nsba.org/newsroom/american-school-board-journal/asbj-august-2017/trending-school-security>
- ¹³ <http://www.wssca.org/Links>
- ¹⁴ Bushes should be trimmed to no more than 3 feet in height, and trees should be trimmed so that there are no branches lower than 8 feet.
- ¹⁵ There is only one known incident where an attacker breached a locked classroom, entering through a broken sidelite window. In that incident, a makeshift barricade such as a filing cabinet may have delayed him, whereas it's difficult to see how a commercial barricade would have made any difference.
- ¹⁶ <https://dsps.wi.gov/Documents/Programs/CommercialBuildings/FAQSecurityLocksSchools.pdf>, downloaded 1/17/2019.
- ¹⁷ <https://www.nfpa.org/-/media/Files/Code-or-topic-fact-sheets/SchoolSafetyUpdate.ashx>, downloaded 3/7/2019.
- ¹⁸ <https://www.safeandsoundschools.org/2019/01/22/lets-open-the-conversation-about-door-safety/>
- ¹⁹ Marinette [WI] High School, 11/29/2010; Cokeville [WY] Elementary School, 5/16/1986; Platte Canyon [CO] High School, 9/27/2006; West Nickel Mines [PA] School, 10/2/2006; Castle View Elementary School [Riverside, CA], 10/31/2017; Philip Barbour High School [Philippi, WV], 8/25/2015; Stockton Springs [ME] Elementary School, 10/31/2008; McKee [KY] High School, 9/19/1989; Lindhurst High School [Olivehurst, CA], 5/2/1992.
- ²⁰ Virginia Tech and an Amish school in Nickel Mines, PA are the most well-known examples
- ²¹ For example, the Eaton Township [PA] Weis Market shooting in June of 2017.
- ²² https://www.stltoday.com/news/local/crime-and-courts/ex-teaching-assistant-charged-in-sexual-assault-of-boy-at/article_3739bea8-da8b-58e8-a82f-f6ab87676516.html, <https://patch.com/california/milpitas/classroom-sexual-assault-suspect-arrested>, <http://www.dailyadvance.com/News/2018/05/15/Camden-high-school-student-charged-with-sex-assault-of-another-student.html>, etc.
- ²³ While termed the "safe zone" is used this manual, no location can be guaranteed to be completely safe in a mass attack. Variables beyond the scope of this manual, such as building construction, perpetrator weapons, defender actions, and numerous other factors ultimately determine the safety of individuals in such situations.
- ²⁴ <https://fox6now.com/2019/02/05/court-docs-no-one-was-monitoring-security-cameras-intercom-system-during-attack-on-froedtert-nurse/>
- ²⁵ *Violence Prevention in Schools - Enhancement Through Law Enforcement Partnerships*, U.S. Department of Justice, Federal Bureau of Investigation, undated brochure.

- ²⁶ *Violence Prevention in Schools - Enhancement Through Law Enforcement Partnerships*, U.S. Department of Justice, Federal Bureau of Investigation, undated brochure.
- ²⁷ *Violence Prevention in Schools - Enhancement Through Law Enforcement Partnerships*, U.S. Department of Justice, Federal Bureau of Investigation, undated brochure.
- ²⁸ *State v Jerrell C.J.*, <https://www.wicourts.gov/sc/opinion/DisplayDocument.html?content=html&seqNo=18921>. "[in custodial interviews]... the failure 'to call the parents for the purpose of depriving the juvenile of the opportunity to receive advice and counsel' will be considered 'strong evidence that coercive tactics were used to elicit the incriminating statements.'...However, we remind law enforcement officials that Wisconsin law requires an 'immediate attempt' to notify the parent when a juvenile is taken into custody. Wis. Stat. § 938.19(2)."
- ²⁹ "Thus, school officials need not obtain a warrant before searching a student who is under their authority. Moreover, school officials need not be held subject to the requirement that searches be based on probable cause to believe that the subject of the search has violated or is violating the law. Rather, the legality of a search of a student should depend simply on the reasonableness, under all the circumstances, of the search. Determining the reasonableness of any search involves a determination of whether the search was justified at its inception and whether, as conducted, it was reasonably related in scope to the circumstances that justified the interference in the first place. Under ordinary circumstances, the search of a student by a school official will be justified at its inception where there are reasonable grounds for suspecting that the search will turn up evidence that the student has violated or is violating either the law or the rules of the school. And such a search will be permissible in its scope when the measures adopted are reasonably related to the objectives of the search, and not excessively intrusive in light of the student's age and sex and the nature of the infraction." *New Jersey v T.L.O.*, U.S. Supreme Court, 1985, <https://www.law.cornell.edu/supremecourt/text/469/325>.
- ³⁰ *In the Interest of Angelia D.B.*, Wisconsin Supreme Court, 1997, <https://www.wicourts.gov/sc/opinion/DisplayDocument.pdf?content=pdf&seqNo=17070>.
- ³¹ <https://www.activeresponsetraining.net/when-do-school-shootings-occur>
- ³² One example of this necessity is shown by an incident where 12 children suffered injuries in a dog attack on an elementary playground. [12 children injured in dog attack at OKC elementary school, officials say](#), KOCO News 5. Another example is the Jonesboro school shooting in March of 1998, [Amid National School Safety Debates, Jonesboro Marks Anniversary Of A Middle School Shooting](#), Arkansas Public Media, both downloaded 3/7/19.
- ³³ Columbine Review Commission, 2001, p. 94-97
- ³⁴ Every DOJ School Safety Grant recipient was required to establish an SSIT no later than August 31, 2020.
- ³⁵ DOJ grant recipients must seek case-by-case approval from the Office of School Safety to expand beyond a "one SSIT per school" format.
- ³⁶ The specified Adolescent Mental Health training curriculum was created by the National Center for Mental Health and Juvenile Justice. This 12-hour course includes information on developmentally appropriate behavior vs. mental illness, symptoms of specific diagnosis, trauma informed practices, de-escalation techniques, engaging parents in the process, and a community service provider discussion panel.
- ³⁷ Nicoletti, J., & Spencer-Thomas, S. (2002). *Violence goes to school*. Bloomington, IN: National Educational Service, pp.105-106.
- ³⁸ Law enforcement may wish to avoid creating a "special relationship" with the target.
- ³⁹ See Wisconsin Statute § 118.125(2)(j) for requirements regarding proper parental notification and timelines.
- ⁴⁰ *School Resource Officers, School Law Enforcement Units, and the Family Educational Rights and Privacy Act*, U.S. Department of Education, https://studentprivacy.ed.gov/sites/default/files/resource_document/file/SRO_FAQs_2-5-19_0.pdf
- ⁴¹ The [Azana Spa shooting](#) of October, 2012, and the [Marathon County active shooter](#) of March, 2017.
- ⁴² <https://www.cnn.com/2017/04/10/us/san-bernardino-school-shooting/index.html>
- ⁴³ Some published articles have implied that lockdown drills may be detrimental to children. A careful reading might suggest that it's not lockdown *drills* that are traumatic – the impact is a result of being in an actual potentially dangerous situation. No one would suggest not locking-down or locking-out in dangerous situations, and it's important to understand the differences to react properly in concerning situations. This is one reason the DOJ promotes the Standard Response Protocol.
- ⁴⁴ John-Michael Keyes presentation
- ⁴⁵ <https://www.washingtonpost.com/graphics/2018/local/school-lockdowns-in-america/>
- ⁴⁶ <https://www.courant.com/news/connecticut/hc-xpm-2013-03-13-hc-newtown-lanza-mass-murderers-20130313-story.html> (downloaded 1/7/2019) and presentation by Michele Gay, Safe and Sound Schools (insert date & location)
- ⁴⁷ *Best Practice Considerations for Schools in Active Shooter and Other Armed Assailant Drills: Guidance From the National Association of School Psychologists and the National Association of School Resource Officers*, updated April 2017, p.6.

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- ⁴⁸ *Lockdown Drill Teacher Guidance*, I Love U Guys Foundation, <https://iloveguys.org/srp/SRP%20K12%20Teacher%20Guidance.pdf>
- ⁴⁹ *Best Practice Considerations for Schools in Active Shooter and Other Armed Assailant Drills*, updated April 2017, Appendix 3.
- ⁵⁰ *Lockdown Drill Guidance*, I Love U Guys Foundation, <https://iloveguys.org/srp/Lockdown%20Drill%20Guidance.pdf>
- ⁵¹ For example, [*Teen charged after holding entire Loris High soccer team hostage, policy say*](#). MyrtleBeachOnline, posted March 28, 2018.
- ⁵² For a Wisconsin example, [*Brawling moms in viral youth wrestling video ticketed by police*](#), WKOW 27, posted February 15, 2019.
- ⁵³ [*Guide for All-Hazard Emergency Operations Planning*](#), FEMA, September 1996.
- ⁵⁴ "The Incident Command System (ICS) is a management system designed to enable effective and efficient incident management by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure. ICS is normally structured to facilitate activities in five major functional areas: command, operations, planning, logistics, Intelligence & Investigations, finance and administration. It is a fundamental form of management, with the purpose of enabling incident managers to identify the key concerns associated with the incident—often under urgent conditions—without sacrificing attention to any component of the command system." <https://www.fema.gov/incident-command-system-resources>
- ⁵⁵ <https://training.fema.gov/programs/emischool/emischool.aspx/>
- ⁵⁶ <https://wkow.com/news/2018/10/16/jefferson-co-prosecutors-shirtless-man-with-dog-terrorized-school/>
- ⁵⁷ Report to the President on Issues Raised by the Virginia Tech Tragedy, June 13, 2007, USDHHS, USDoE, and USDOJ, https://www.justice.gov/archive/opa/pr/2007/June/vt_report_061307.pdf, p. 7.
- ⁵⁸ <https://www.twincities.com/2013/05/11/report-details-bomb-plot-at-wauwatosa-school/> and <http://archive.jsonline.com/news/milwaukee/bomb-plot-uncovered-at-tosa-east-high-school-8o9trc1-207046811.html>, both downloaded 3/13/19.

From: [Monica McCabe](#)
To: [Plan Commission Comments](#)
Subject: Plan Commission Meeting 11/13 re: Holy Name Heights
Date: Monday, November 13, 2023 10:46:17 AM

To Whom it May Concern,

My name is Monica McCabe. I have been a Madison west-side resident for over 40 years. My 81 yo mother and I moved into Holy Name Heights in June of this year. We are in full support of the vision of utilizing all of the vacant or scarcely used areas of Holy Name Heights. We stand behind the vision to bring a part of the building back to its original mission - as a school that fosters the formation and deepening faith of our youth - our future Church. The positives far outweigh the fear of the unknown. We trust that problems and issues that arise will be handled swiftly with compassion, patience, and charity. We are called to be ambassadors of Christ by welcoming St. Ambrose School. We can't claim to be Christian and do anything less.

Monica McCabe and
Margaret Flynn

706 S High Point Rd #322
Madison, WI 53719

From: [Monica McCabe](#)
To: [Plan Commission Comments](#)
Subject: Plan Commission Meeting 11/13 re: Holy Name Heights
Date: Sunday, November 12, 2023 4:22:27 PM

Caution: This email was sent from an external source. Avoid unknown links and attachments.

To Whom it May Concern,

My name is Monica McCabe. I have been a Madison resident for over 40 years. My mother and I moved into Holy Name Heights in June of this year. We are both in favor of having St. Ambrose occupy the vacant areas of the building. We trust that problems and issues that will arise will be handled with compassion, patience, and Christian charity. We are in full support of the vision of utilizing all of Holy Name Heights bringing the building back to its original mission as a school. We are called to be ambassadors of Christ.

From: [Tom Solyst](#)
To: [Plan Commission Comments](#)
Subject: Fwd: St. Ambrose wants to land at Holy Name
Date: Sunday, November 12, 2023 4:18:53 PM

Caution: This email was sent from an external source. Avoid unknown links and attachments.

Please include this article as a public comment.

Thank you.

----- Forwarded message -----

From: **Janet Wheaton** <jmwheat07@gmail.com>
Date: Sat, Nov 11, 2023, 9:44 AM
Subject: St. Ambrose wants to land at Holy Name
To: Thomas Solyst <tsolyst@gmail.com>

https://madison.com/st-ambrose-wants-to-land-at-holy-name/article_2c8ee29f-43d1-5958-a6b1-5bcf13468ec1.html

Sent from my iPhone

From: [Tom Solyst](#)
To: [Plan Commission Comments](#)
Subject: Fwd: St Ambrose proposal
Date: Sunday, November 12, 2023 4:02:33 PM

Caution: This email was sent from an external source. Avoid unknown links and attachments.

Please include as a public comment.

----- Forwarded message -----

From: **Thomas Solyst** <tsolyst@gmail.com>
Date: Fri, Nov 3, 2023, 11:48 AM
Subject: St Ambrose proposal
To: McKinney, Barbara <District1@cityofmadison.com>, <tparks@cityofmadison.com>

John Duncan and Tim Parks

Thank you for the time you are dedicating to this important issue. My experience with city staff has always been very positive and I respect and I am thankful for the work of city staff to make Madison a wonderful and safe place to live. I feel without your intervention the important safety and policy implications of this zoning change would not be addressed by developers, residents, or city staff. Thank you.

I believe the Madison community should be actively engaged with our schools and help provide a positive and safe place for all our students to thrive. I believe everyone should support and be advocates for the children of Madison to receive the best possible education. However, I am concerned about the safety of the students and residents affected by this proposal. As I do research I realize that the planning commission is making a policy decision and approving a mix use building model that has never been tried before and the commission has not pointed to an example of a similar model that was successful.

I can not find one mix use development that includes a school and a residential complex under one roof in the entire state and for sure not in Madison. What I have found are a number of mix use buildings in Madison that have apartments and commercial space under one roof. All of these developments incorporate a design that includes a separate secure entrance and exit for the residential and commercial space to insure the safety of the residents and the customers of the commercial spaces. I am wondering did city staff research the implications of this very unique and unknown model and a zoning change that would result in 280 students and staff sharing one entrance and multiple exits with 53 apartment units. We should be asking the following questions:

Is this a design where everyone feels safe and is protected?

Can this design guarantee that students and apartment residents do not have access to each other's space?

Would this zoning change and model be approved without more indepth study and community input if St Ambrose was a public school?

Do students who attend private schools deserve the same oversight and protection that is given to public school students?

Should this design/proposal be held to the same high standards and scrutiny that would include public school best practices to ensure the safety of students and residents?

Have we done enough research and addressed the potential safety risks that will be created if this current design and zoning change is approved?

Can we develop a better design that includes and follows the best practices for school and residential safety that will ensure the safety of everyone using this facility.

I think everyone would feel more comfortable if we knew of a successful current model or example where a school of 280 students and an apartment complex were housed under one roof with a shared entrance, multiple shared exits, and access to the entire building. To ensure the safety for both students and residents there needs to be separate secure entrances and exits for both students and residents. As the plan stands now both residents and students can access the entire building.

I know to address my concerns and the concerns of many of the residents will take more time. However I feel it is better to take the time to ensure the safety of everyone than to approve this unique model without further research.

Thank you for your service to our city.

Tom Solyst
706 S High Point Rd
Apt 328
Madison WI 53719

From: [David Kirsch](#)
To: [Plan Commission Comments](#)
Subject: Planning Commission private middle/high school
Date: Saturday, November 11, 2023 2:46:45 PM

Caution: This email was sent from an external source. Avoid unknown links and attachments.

I live across the street at High Point Woods, and I support private schools such as this one.

David Kirsch
816-294-7124

From: [Janet Wheaton](#)
To: rasoldner@madison.k12.wi.us; [Field, Derek](#); sundevils98@yahoo.com; [Duncan, John](#); ledell.zellars@gmail.com; klanespencer@gmail.com; mcshepard@madisoncollege.edu; nicole.solheim@gmail.com; pwheck@gmail.com; [Figueroa Cole, Yannette](#); [Stouder, Heather](#); [Cleveland, Julie](#); [Parks, Timothy](#)
Subject: Fwd: Email to plan commission
Date: Sunday, November 12, 2023 6:00:45 PM

Caution: This email was sent from an external source. Avoid unknown links and attachments.

Legistar File ID # 79963
Meeting - Monday, November 13th

Thank you for your attention to this very important matter. We hope you take the time to read the DOJ document and gain a greater understanding of our strong opposition to St. Ambrose school moving to the Holy Name Heights apartment building.

Sent from my iPhone

Begin forwarded message:

From: Janet Wheaton <jmwheat07@gmail.com>
Date: November 11, 2023 at 9:39:03 PM CST
To: Thomas Solyst <tsolyst@gmail.com>, Donna Biddle <donna.biddle39@gmail.com>, John Kroeger <jael3900@tds.net>, slemancik@wisc.edu
Subject: Email to plan commission

To the Plan Commission:

We have forwarded to the 'plan commission public comments page' the 89 page document developed by the WI DOJ titled -
'Comprehensive School Safety Framework Making Wisconsin Schools Safer'

Below for your review, we have highlighted some of the key elements of importance regarding the proposal to add a school to our apartment building.
Legistar File # 79963

pg. 9&10

- * controlling access is a foundational concept of school safety. ALL school entrances must be locked
- * visitor protocol - a person entering the building has to go to a designated entrance where they are screened.

No school in this day and age should be allowed to open without all safety and security measures in place and fully signed off by experts in the field.

pg. 17

- * provide the safest and most secure environment for all by identifying and preventing risk. On site assessment has to be done by an unbiased outside observer to prevent inaccurate assumptions.

pg. 20

“we must redouble our efforts to restrict access to school buildings”

pg. 23

* main entrance design - “all doors should be locked during the day, including the main entrance.” We have shared entrances, exits, elevator, stairways and hallways.

pg. 32

* maps must be provided to local law enforcement - # of entrances, room numbers and descriptions - art / gym / office / lunch

pg. 37-43

Does St. Ambrose have a School Safety Intervention Team (SSIT) ?

pg. 45-46

* SAA classrooms are approximately 10% of the building, yet every time someone targets the school they are targeting everyone in the building. 100% of this building has to be secured.

pg. 47-48

Standard Response Protocol

Lockout - secure the perimeter

Lockdown - threat inside the building

Evacuate - move to another designated location

Shelter - for personal protection

pg. 60

2017 WI Act 143

Updated requirements for school safety plans under Wi Statutes - every school board and private school must have a school safety plan that meets the following standards of WI Statute 118.07 (4)

This action by the Plan Commission is unprecedented. There is no model to reference. More in depth research has to be done. No one is engaged in a debate over this private school. We’ve had two informational meetings resulting in more questions than answers.

We appreciate you taking the time to read this thoroughly written and informative document.

With thanks,

Holy Name Heights residents -

Jack Kroeger

Donna Biddle

Tom Solyst

Stephanie Lemancik

Janet Wheaton

Sent from my iPhone

From: [Janet Wheaton](#)
To: [rasoldner@madison.k12.wi.us](#); [Field, Derek](#); [sundevils98@yahoo.com](#); [Duncan, John](#); [ledell.zellers@gmail.com](#); [mcshepard@madisoncollege.edu](#); [nicole.solheim@gmail.com](#); [pwheck@gmail.com](#); [kianespencer@gmail.com](#); [Stouder, Heather](#); [Figueroa Cole, Yannette](#); [Cleveland, Julie](#); [Parks, Timothy](#)
Subject: St. Ambrose wants to land at Holy Name
Date: Sunday, November 12, 2023 4:26:07 PM

Caution: This email was sent from an external source. Avoid unknown links and attachments.

Thank you for taking the time to read this article from Saturday's WSJ in advance of tomorrow night's plan commission meeting.

Janet Wheaton
Tom Solyst
Donna Biddle
Jack Kroeger

https://urldefense.proofpoint.com/v2/url?u=https-3A__madison.com_st-2Dambrose-2Dwants-2Dto-2Dland-2Dat-2Dholy-2Dname_article-5F2c8ee29f-2D43d1-2D5958-2Da6b1-2D5bcf13468ec1.html&d=DwlFaQ&c=byefhD2ZumMFFQYPZBagUCDuBiM9Q9twmxaBM0hCgII&r=vOyEV5saPqeluXR5yw9NsuutK2V4_YmogotfxfecCJc&m=sRnTbLsmRCtQ87bUDC80X-rYkywlbxcwZbqlqzmzNK9V0oP2km3gDT8hL3aGhWK9R&s=QmyZb9LvCiQfO8E16Ww3Uke5kntkofNNTDYatKWtkSs&e=

Sent from my iPhone

From: [Donna Biddle](#)
To: [Plan Commission Comments](#)
Cc: [Cleveland, Julie](#)
Subject: Fwd: Ref: Legistar 79963 St. Ambrose Academy - Holy Name Catholic Center
Date: Friday, November 10, 2023 12:14:30 PM

Caution: This email was sent from an external source. Avoid unknown links and attachments.

> November 10, 2023

>

> The intent of this letter is to convey my position on the proposed St. Ambrose Academy move to Holy Name Heights (aka Holy Name Catholic Center). My perspective is not only as a seven year resident of HNH but also as a concerned member of the community. I'd like to focus on school safety and explain why the lack of attention to it has me wondering why this isn't of the highest priority.

>

> Security and safety of the students, staff as well as everyone housed or working in this building impacts everyone. There is no question that school safety is top of mind for educators as well as city officials, parents and neighbors.

>

> At a meeting held earlier this week with representatives from the Diocese and St. Ambrose, residents, the fire commissioner, the architect for the school and from Gorman & Company (building management) discussions and presentations were ongoing concerning but not limited to school safety preparedness.

>

> When questioned about students (currently approximately 165 enrolled with a maximum of 280) coming and going, a St. Ambrose staff member explained that 3 staff members would be sure that as students use the front entrance from 7:30-8:00 am and from 3:15-3:45. The staff would be sure that the students walk the 75 feet from the front door up a flight of stairs that would lead them around a corner to the doors of the school.

>

> Please note that the front entrance opens to a wide lobby where there are 4 stairways and an elevator providing easy access to the entire building. This includes all the residential apartments, the other business, the gymnasium, the mail room, two courtyards, a two level garage, etc. So from 8:00 until 3:15 no one from the school staff is monitoring the entrance. There is a reception desk near the front entrance where a receptionist sits, normally 4-5 weekdays. If she is away, no one is at the desk. There is no security in place to prevent unauthorized persons or to monitor visitors. This implies an even greater risk given the opportunity of violence posed in a school setting.

>

> According to the "Comprehensive School Security Framework", "Making Wisconsin Schools Safer" published by the Wisconsin Department of Justice" there are many issues of concern that I did not find addressed or responded to as I reviewed the following:

> Planning Division Staff Report dated 10-30-2023

> Planned Development District (PD) pages 8-13

> Post Town Hall & Survey FAQs: Joint Exploration for St. Ambrose Academy to Become an Anchor Tenant at HNH

>

> Not found in writing, but presented verbally by a St. Ambrose staff member, they mentioned an upgraded camera system was planned to add security. Reference page 26 of the above CSSF, in summary, cameras have a limited role in that they can assist in incident investigation or deter bad behavior, but do not prevent violence.

>

> Several other school safety measures were not addressed. There was no mention of:

> A Standard Response Protocol

> Crisis Rehearsal and Response (Training for School, Residents and Businesses)

> Notification not only to the school but for the entire building (PA system) to alert us all in case of 1) Lockout 2) Lockdown 3) Evacuation 4) Shelter in Place

>

> If HNH includes a school, grades 6-12 or any school, then everyone in the building needs to be aware of any threat or risk. This notification may also include the surrounding neighborhood.

>

> Anyone can enter the building looking for the school and find themselves anywhere on the premises. In essence, we are all at risk living in a school house.

>

> Therefore, for the safety and security of all, I am opposed to St. Ambrose Academy moving to HNH.

>

> Thank you for the opportunity to have a voice.

> Donna Biddle

> Resident, HNH

>

>

November 10, 2023

Dear Planning Commission:

Holy Name Heights has, and is continuing to break the law by having me and other new tenants sign a lease without a word about plans for a school, or trying to rezone. This is misrepresentation and outright false advertising (the website.)

In addition, changing the material terms of the lease without the consent of existing tenants is breaking the law.

Is it not the responsibility of the Planning Commission to be sure that they withhold permission for a development that breaks the law until the plans are reconciled with existing laws?

I signed my lease in July, 2023, and moved in during August.)(I'm 70.) I spent thousands of dollars on the move-in.

This is a misrepresentation, not to mention plans that are very far along. (ACTP #134) I am asking for conversion to a month-to-month lease. I have back surgery on November 29, 2023, and it will take a few months to recover and find a new place to live. I also believe because they broke the law, the Diocese should reimburse me for my moving expenses. I am asking for equitable relief.

The Diocese and Gorman clearly knew that I wouldn't have signed the lease if I knew about the plans for the school, or they would have told me, correct? They told us in the meeting last Monday, November 6, that they fully intend to continue breaking this law.

I signed the mixed-use addendum that DID NOT INCLUDE A SCHOOL or new construction. 3. *PURPOSE OF ADDENDUM. The purpose of this Addendum is to provide Resident with notice that the dwelling is located in a mixed-use living environment. The area surrounding the dwelling contains both residences and commercial businesses. These commercial entities will produce certain noises, sounds, and odors up to twenty-four (24) hours a day.*

In addition, the Diocese is committing an anticipatory breach of contract, which will shortly become a material breach of contract, if the rezoning request is approved as is. With such a big change planned, they are breaching the tenant contracts, and they are obligated, legally, to rewrite all of our leases, in order to get the consent of the tenants. Wis. Stat. Ch. 704.

For my part, I don't want to live in a high school building at all. I need the peace and quiet I was told I was getting.

For other tenants, the main concerns are security, safety, (which included health concerns should there be another pandemic), noise (both construction and from the school), parking and fair representation. At the meeting with Alder Duncan, neither the Diocese nor Gorman nor St. Ambrose expressed one word of concern about the impact on tenants. The tenant concerns should be specifically addressed, so that at the minimum there are no shared doors or walls, effective sound-proofing, adequate reserved parking, and construction hours are limited. New leases with commitments for addressing concerns, are both a reasonable and legal request.

Please delay approval until the Diocese has 1.) Changed our leases (for those of us who can't consent) to month-to-month, and made amends for misrepresentation, and 2) gotten tenant consent to the changed leases by committing, in the new leases, to the building plans that work also for the tenants.

Thank you.

Kathleen Lowry Tenant, Holy Name Heights. lowrykathleen@hotmail.com