

# **Analysis of Recommendations in MSDPSC Reports**

**First report: January 2019  
Second Report: November 2019**

1



# **First Report: Physical Security**

2



**First Report: Chapter 3, page 83**

***Physical Security***

1.	Districts implement a tiered approach to campus hardening.	<b>PENDING</b>
2.	FDOE's Office of Safe Schools (OSS) should engage school hardening experts.	<b>COMPLETE</b>
3.	OSS should conduct a review of target-hardening practices developed by other states and school safety organizations.	<b>COMPLETE</b>
4.	OSS should provide the districts with a tiered list of best practices with annual review/revisions.	<b>ONGOING</b>
5.	Legislature should create a permanent body to oversee physical site security of schools.	<b>NOT ADOPTED</b>

3



**First Report: Chapter 3, page 83**

***Physical Security***

6.	All districts must implement the following harm-mitigation strategies immediately (7a – 7g).	<b>PENDING</b>
7.	The legislature should mandate compliance and establish consequences for non-compliance.	<b>ONGOING</b>
7a.	School safety is the responsibility of all staff and responsibilities must be in policy/procedure manual.	<b>ONGOING</b>
	School security should meet regularly and train on proper procedures, coordinate with law enforcement.	<b>ONGOING</b>
7b.	All school campus gates must remain closed/locked	<b>COMPLETE</b>
	and staffed when open.	<b>PENDING</b>
7c.	All teachers should be able to lock doors from within the classroom and keep keys on their person at all times.	<b>PENDING</b>

4



**First Report: Chapter 3, page 83**

***Physical Security***

7d.	Every district and school should have a written, disseminated active assailant policy which empowers all personnel to initiate a Code Red.	<b>COMPLETE</b>
7e.	Every school must have an effective communication system to receive notice of a Code Red.	<b>PENDING</b>
7f.	Establish classroom safety measures such as “hard corners.”	<b>PENDING</b>
7f.	Teachers should have ability to cover door windows quickly.	<b>PENDING</b>
7g.	Evaluate and give consideration to locking bathroom doors.	<b>COMPLETE</b>
8.	All districts should establish a system to ensure compliance and accountability.	<b>ONGOING</b>

5



**First Report:  
School Resource Officers**

6



**First Report: Chapter 4, page 101**  
***School Resource Officers***

9.	All law enforcement agencies should bring all SRO's under a single, closely supervised command.	<b>PENDING</b>
10.	All stakeholders must be aware an SRO's primary responsibility is enforcement of laws, safety and security of the campus.	<b>COMPLETE</b>
11.	SRO contracts should require high level of information sharing and cooperation, provide access to records, allow for LE autonomy and clearly identify roles/responsibilities.	<b>PENDING</b>
12.	All SRO's should be issued rifles and ballistic vests and have the items readily available on campus.	<b>NOT ADOPTED BY ALL AGENCIES</b>
13.	SRO's should receive frequent, thorough and realistic training in high-risk/stress situations, especially single-officer response.	<b>ONGOING</b>



**First Report: Chapter 4, page 101**  
***School Resource Officers***

14.	SRO's should be among most well-trained, well-equipped to confront active-shooters, they should attend annual training in this area.	<b>ONGOING</b>
15.	The SRO's immediate supervisor should regularly walk the school with each SRO to address security and effective response.	<b>ONGOING</b>
16.	SRO's should receive adequate training on records laws, trauma-informed care, socio-emotional learning, restorative justice problem solving and cultural competence.	<b>ONGOING</b>
17.	Minimum of one SRO (middle/high) or Guardian (elementary) on each campus.	<b>COMPLETE</b>
	Allocation of SRO/Guardian must provide for immediate backup.	<b>PENDING</b>



**First Report: Chapter 4, page 101**  
***School Resource Officers***

18.	School districts and charter schools should permit the most expansive use of the Guardian Program.	<b>PENDING</b>
19.	School districts should not limit the Guardian program to only dedicated guardians.	<b>NOT ADOPTED BY ALL DISTRICTS</b>
20.	The legislature should expand the Guardian program to teachers.	<b>COMPLETE</b>
21.	The legislature should mandate that upon a majority vote of the School Board the sheriff shall establish a Guardian program.	<b>COMPLETE</b>
22.	The legislature should increase safe schools funding, amend funding requirements of SB 7026 and restore authority of school boards to obtain funding.	<b>PENDING</b>

9



**First Report:  
 Law Enforcement**

10



**First Report: Chapter 5, page 202**

***Law Enforcement***

23.	The Broward Sheriff’s Office (BSO) should conduct a through review and address all actions or inactions of all personnel on February 14, 2018.	<b>COMPLETE</b>
24.	BSO should review the actions of the seven deputies who heard gunshots and, if necessary, open a formal internal affairs investigation.	<b>COMPLETE</b>
25.	All public schools should immediately provide law enforcement access to live, real-time access to all cameras along with adequate training.	<b>PENDING</b>
26.	All Broward County LE, fire, and EMS agencies should establish protocols for unified command.	<b>PENDING</b>
	Every County should be required to have a ILA establishing protocols for a unified command.	<b>PENDING</b>

11



**First Report: Chapter 5, page 202**

***Law Enforcement***

27.	A staging area outside the command post should be standard protocol for meeting elected officials.	<b>COMPLETE</b>
28.	BSO should revise its active assailant policy to make it clear deputies are to immediately pursue active assailants and “containment” is not the policy.	<b>COMPLETE</b>
29.	BSO should increase the frequency of their active assailant training.	<b>COMPLETE</b>
30.	CJSTC and agencies should require single-officer response to active assailant training.	<b>PENDING</b>
31.	All LE agencies must have a proactive active shooter response policy which includes immediately responding to and stopping the threat.	<b>PENDING</b>

12



# First Report: Fire Department/EMS

13



## First Report: Chapter 6, page 213

### *Fire Department/EMS*

32.	LE and fire departments should have established agreements governing self-deployment.	<b>PENDING</b>
33.	LE agencies are encouraged to formalize Rescue Task Force protocols and train regularly.	<b>PENDING</b>
34.	Fire and EMS must be part of the unified command at any MCI or significant event.	<b>COMPLETE</b>

14



# First Report: Law Enforcement Communications

15



## First Report: Chapter 7, page 230 *Law Enforcement Communications*

35.	LE should be required to have communications interoperability with all LE agencies in their county.	<b>COMPLETE</b>
36.	If an agency asks for another for access to their primary dispatch channels, it should be mandated that the agency honor the request.	<b>PENDING</b>
37.	LE should tactically train their personnel so they are familiar with all radio functionality.	<b>PENDING</b>
38.	Florida law should require that all primary 911 call centers have the ability to directly communicate with the first responders for whom they receive calls.	<b>COMPLETE</b>
39.	All public safety agencies should work toward consolidation of 911 call centers.	<b>PENDING</b>
40.	School districts and LE agencies should strive for radio interoperability.	<b>PENDING</b>

16



**First Report:  
BCPS Actions Related to the  
Incident**

17



**First Report: Chapter 8, page 265**  
*BCPS Actions Related to the Incident*

41.	BCPS should investigate the actions of AP Jeff Morford regarding his prior knowledge of Cruz that he should have acted on and whether he violated any policies. BCPS should take appropriate action it deems necessary.	<b>COMPLETE</b>
42.	It is important for people to report concerning behavior, FortifyFL is an excellent opportunity to report this information.	<b>COMPLETE</b>
43.	Schools should be required to notify students of FortifyFL and install the app on all student-issued devices.	<b>COMPLETE</b>
	Future updates should explore two-way live dialogue.	<b>PENDING</b>

18



**First Report: Chapter 8, page 265**

***BCPS Actions Related to the Incident***

	Every district should require personnel to report all indicators of suspicious student behavior to an administrator.	<b>COMPLETE</b>
44.	The administrator should be required to document the report and disposition.	<b>COMPLETE</b>
	The disposition of all threats of violence should be reviewed by at least the school's principal – if not a higher authority - and reported to the threat assessment team.	<b>PENDING</b>



**First Report:  
Mental Health**



**First Report: Chapter 9, page 272**

***Mental Health***

45.	The Commission will address mental health and provide additional recommendations in the future.	<b>COMPLETE</b>
46.	The legislature should require mental health providers to notify law enforcement of threats to harm another and law enforcement should notify the threatened person.	<b>COMPLETE</b>
47.	School districts should be required to establish agreements with mental health community providers to increase collaboration/information sharing.	<b>PENDING</b>
48.	Private providers should share and coordinate information with school-based providers.	<b>COMPLETE</b>
49.	The sharing of information should be mandated when there is a threat of harm to school personnel/students.	<b>COMPLETE</b>

21



**First Report: Chapter 9, page 272**

***Mental Health***

50.	Schools should be required to share student mental health information with community-based providers.	<b>COMPLETE</b>
51.	School mental health and counseling records should be included in each student's records and those records should accompany the student if they move to another district.	<b>COMPLETE</b>
52.	The legislature and Department of Health should collaborate on these recommendations.	<b>ONGOING</b>
53.	Any student referred for developmental delay and/or behavioral issue testing and screening be tested with 45 days of the referral and that the student be provided a referral for resources and/or services within 30 days of the testing/screening.	<b>COMPLETE</b>

22



**First Report: Chapter 9, page 272**

***Mental Health***

54.	Consider targeted case management for individuals 13 – 25 who are high utilizers of school and community-based mental health services and/or have been identified as a potential school threat	<b>PENDING</b>
55.	Use a blended funding approach for SEDNET using school- and community-based funding sources to enhance coordination and funding	<b>PENDING</b>
56.	All juvenile pre-arrest diversion programs that address criminal conduct must be a part of and operated consistently with criteria established by the state attorney and other stakeholders. Any school-based program must be approved by the school board and defined in policy.	<b>COMPLETE</b>

23



**First Report: Chapter 9, page 272**

***Mental Health***

57.	Each judicial circuit should consult with others to create as much consistency statewide as possible, each program should, at a minimum, include:	<b>COMPLETE</b>
57a.	Assessment protocol and referral process and requirements for follow-up and notification of non-compliance to the state attorney’s office.	<b>COMPLETE</b>
57b.	Limitation on the maximum number of referrals	<b>COMPLETE</b>
57c.	Prohibition against “resetting” the count each school year, referrals are to be cumulative	<b>COMPLETE</b>
57d.	All pre-arrest programs report data to DJJ.	<b>COMPLETE</b>
57e.	Nothing shall limit a law enforcement officer from making an arrest or exercising discretion.	<b>COMPLETE</b>

24



# First Report: Threat Assessments

25



## First Report: Chapter 11, page 285

### *Threat Assessments*

<b>58.</b>	BCPS should investigate Morford’s conduct surrounding Cruz’s threat assessment. If Morford was found to have not violated policy, the policy should be modified. BCPS should investigate whether Principal Thompson’s disengagement from the threat assessment violated policy.	<b>COMPLETE</b>
<b>59.</b>	BCPS should immediately evaluate its threat assessment process to determine if there is a districtwide problem.	<b>COMPLETE</b>
	All TATs across Florida, including BCPS, should be proactive and not reactive.	<b>PENDING</b>
<b>60.</b>	The guiding principle for the threat assessment process should be behavior, not a threat – the most successful processes assess aggregated information.	<b>COMPLETE</b>

26



**First Report: Chapter 11, page 285**  
***Threat Assessments***

61.	TATs should have dedicated positions/members, however, temporary members should be used to supplement the team or provide specific information or knowledge.	<b>COMPLETE</b>
62.	There should be district oversight of the TAT process and district review of all Level 2 assessments.	<b>PENDING</b>
62.	Principals should be required to be informed of every threat and should approve of each TAT disposition.	<b>PENDING</b>
63.	DOE should develop a standardized, statewide behavioral threat assessment instrument...	<b>COMPLETE</b>
63.	...and database.	<b>PENDING</b>

27



**First Report: Chapter 11, page 285**  
***Threat Assessments***

64.	The legislature should mandate DOE's creation of a statewide threat assessment instrument...	<b>COMPLETE</b>
64.	...and database.	<b>PENDING</b>
65.	All TATs should be comprised of static members with case-specific at-large positions. TATs should be required to meet at least monthly and be proactive. TATs should receive regular training on threat assessments.	<b>PENDING</b>
66.	TATs should meet within 24 hours of a referral when school is in session. If school is not in session, the TAT must refer the matter to law enforcement. When school resumes the TAT should meet no later than the end of the first day of school to ensure the matter is resolved.	<b>PENDING</b>

28



## First Report: Chapter 11, page 285

### *Threat Assessments*

67.	All school personnel should receive training on behavior indicators that should be referred to the TAT. Reporting such behavior should be mandated and there should be sanctions for non-reporting.	<b>PENDING</b>
68.	There must be adequate resources to which the TAT can refer a child, TAT's are a problem identifier and not a problem solver.	<b>PENDING</b>



## First Report: ESE and Educational Services



**First Report: Chapter 12, page 293**  
***ESE and Educational Services***

69.	There should be a Florida workgroup established to determine necessary changes to federal law regarding ESE. This workgroup should work with the Florida congressional delegation to request changes.	<b>PENDING</b>
70.	School personnel should be properly trained on their ESE obligations under state and federal law.	<b>PENDING</b>
71.	TATs and IEP committees must coordinate information and courses of action for ESE students.	<b>PENDING</b>
72.	Students with IEPs that involve severe behavioral issues should be evaluated by the TAT.	<b>PENDING</b>



**First Report:**  
**FSSAT**



**First Report: Chapter 13, page 296**

***FSSAT***

73.	The legislature should mandate that the FSSAT be the primary instrument to assess physical site security.	<b>COMPLETE</b>
74.	FDOE should be given compliance authority to ensure each school and district submits an annual FSSAT.	<b>COMPLETE</b>
75.	FDOE should be tasked with, and funded for, providing training on assessing physical site security and properly completing the FSSAT.	<b>PENDING</b>
76.	Each site assessment should be required to be conducted in conjunction with law enforcement.	<b>COMPLETE</b>
77.	The districtwide FSSAT should set forth security priorities for the district and explain progress in implementing the prior year's priorities.	<b>ONGOING</b>

33



**First Report: Chapter 13, page 296**

***FSSAT***

78.	Any significant deficiencies identified during the FSSAT process that adversely affect the safety and security of the campus should be reported in a timely manner to the school board and a remedial plan should be approved by the school board.	<b>ONGOING</b>
79.	The legislature should provide statutory sanctions for non-compliance with FSSAT submission requirements.	<b>PENDING</b>
80.	The legislature should require school-specific FSSAT's be approved by the superintendent (or designee) prior to submission to FDOE.	<b>PENDING</b>
81.	The current school-specific and districtwide FSSAT should be revised with stakeholder input, especially law enforcement and industrial security experts.	<b>COMPLETE</b>

34



# First Report: Information Sharing

35



## First Report: Chapter 14, page 313 *Information Sharing*

<b>82.</b>	There needs to be extensive training provided to all stakeholders on the appropriate application of FERPA, HIPAA and other often-misunderstood and over-applied laws.	<b>PENDING</b>
<b>83.</b>	The State of Florida should research and offer correct interpretation of HIPAA and 42-CFR and provide resources when information sharing is in question.	<b>PENDING</b>
<b>84.</b>	The legislature should consider changes to Florida school privacy laws to allow better information-sharing and encourage changes to federal law.	<b>PENDING</b>
<b>85.</b>	The Florida congressional delegation should evaluate FERPA, HIPAA, 42-CFR and other laws to allow broader information sharing and disclosure.	<b>PENDING</b>

36



**First Report: Chapter 14, page 313**  
***Information Sharing***

86.	SESIR reporting requirements to FDOE and law enforcement should be evaluated and increased.	<b>COMPLETE</b>
87.	School districts must ensure that each school accurately reports all required SESIR incidents and that underreporting is eliminated. School districts and school administrators should be held accountable for inaccurate reporting.	<b>ONGOING</b>
88.	The legislature should provide FDOE with SESIR oversight and sanction authority. FDOE should be provided inspection authority and be required to conduct audits.	<b>COMPLETE</b>



**Commission's Second Report**  
**November 2019**



## Second Report: Reunification

39



### Second Report: Chapter 3, page 46 *Reunification*

1.	Every law enforcement agency should have a mass casualty death notification and reunification policy.	<b>PENDING</b>
2.	Every policy must have an effective command-and-control structure that identifies an on-site individual to supervise the reunification and reporting process.	<b>PENDING</b>
3.	Agencies should consider the parents' recommendation that families be provided with tentative decedent information to provide more timely notifications.	<b>PENDING</b>
4.	Family members should be provided with regular updates on the status of victim identification.	<b>PENDING</b>
5.	Agency policies should include the pre-identification of the various victim advocate services available and detail how to activate those services.	<b>PENDING</b>

40



**Second Report: Chapter 3, page 46**

***Reunification***

6.	School districts, law enforcement agencies and hospitals should develop coordinated best practices for effective death notification and reunification.	<b>PENDING</b>
	Sheriff’s Offices and police departments should consider a single countywide policy.	<b>PENDING</b>
7.	Critical incident stress debriefings should be mandatory for officers and all personnel, including school personnel, who respond to a mass casualty event and/or participate in reunification.	<b>PENDING</b>
8.	Every district should have a plan, set forth in policy, which addresses reunifying students and staff with their families in emergency situations. Each school should also have a plan consistent with the district policy.	<b>PENDING</b>

41



**Second Report: Chapter 3, page 46**

***Reunification***

9.	Every district plan should identify potential reunification sites, training for employees, equipment, signage, and student/parent information.	<b>PENDING</b>
10.	A unified command structure should be incorporated in the plan, particularly in a mass casualty incident where multiple agencies are involved.	<b>PENDING</b>
11.	Training and practical exercises should be conducted with partner agencies. The reunification plan should also include required after-action reports and protocols should be updated based on those reports.	<b>PENDING</b>

42



## Second Report: Broward Regional Communications

43



### Second Report: Chapter 4, page 74 *Broward Regional Communications*

<b>1.</b>	All regional communications stakeholders should put aside their personal animosity and fulfill their obligations to the citizens to provide effective, efficient and safe radio and 911 communications.	<b>ONGOING</b>
<b>2.</b>	All those in public safety leadership positions must convey to their subordinates an expectation that the Regional Communications system will succeed and that everyone will put aside their differences and work collaboratively to achieve that result.	<b>ONGOING</b>
<b>3.</b>	The City of Hollywood and Broward County must agree on a tower site to complete installation of the radio system.	<b>PENDING</b>

44



**Second Report: Chapter 4, page 74**  
***Broward Regional Communications***

4.	BSO and the County should address concerns raised by employees in the 2016 and 2019 surveys to ensure operational readiness.	<b>PENDING</b>
5.	The county administrator and ORCAT should address concerns by employees in the 2016 and 2019 surveys about technology and poor response to technology problems. They must promptly ensure the Regional Communications Centers have capable, reliable and efficient technology.	<b>PENDING</b>
6.	Margate and Coconut Creek should consider abating their withdrawal from the regional communications system.	<b>NOT ADOPTED</b>



**Second Report: Chapter 4, page 74**  
***Broward Regional Communications***

7.	The legislature should provide the Governor the authority, specific to Broward County or in the broader manner, to declare a communications tower may be placed anywhere in the state if it is in the best interest of public safety.	<b>NOT ADOPTED</b>
----	---	--------------------



## Second Report: Active Assailant Policies and Procedures

47



### Second Report: Chapter 5, page 83 *Active Assailant Policies and Procedures*

<b>8.</b>	The legislature should mandate that all schools include age appropriate decision-based/option-based drills. Every drill in any given year should be comprised of a unique set of circumstances.	<b>PENDING</b>
<b>9.</b>	The legislature should mandate the specific minimum number of emergency and fire drills that take place during every school year at every elementary, middle, high and charter school. All students, faculty, Guardians, SROs, SSOs and volunteers must participate. Law enforcement must be present for active assailant drills. Outlined requirements of drills and the number of drills for elementary, middle and high schools.	<b>PENDING</b>

48



**Second Report: Chapter 5, page 83**  
***Active Assailant Policies and Procedures***

10.	Outlined specific legislative recommendations for elementary schools to minimize drill fatigue and exposure to active threats/assailants.	<b>PENDING</b>
11.	Outlined specific legislative recommendations for middle and high schools.	<b>PENDING</b>
12.	Outlined specific legislative recommendations for ESE students and exceptional student centers.	<b>ADOPTED</b>
13.	The legislature should mandate an after-action report after each fire and emergency drill. The active assailant drill must be completed in conjunction with law enforcement. Issues must be resolved within 30 days and each report should be reviewed by the superintendent or designee.	<b>PENDING</b>

49



**Second Report: Chapter 5, page 83**  
***Active Assailant Policies and Procedures***

14.	The legislature should provide the Board of Education with the authority to establish sanctions for non-compliance with laws originating from these recommendations.	<b>PENDING</b>
15.	A best practice is for law enforcement officers assigned to patrol to become familiar with their schools in their zone including fire and emergency drills.	<b>PENDING</b>
16.	The timeliest way to communicate an on-campus emergency is direct reporting from a school staff member to everyone on campus and the 911 call center simultaneously.	<b>PENDING</b>
17.	All Florida schools should utilize plain language when conducting drills and in real-world incidents.	<b>PENDING</b>

50



## Second Report: Safe School Officers

51



### Second Report: Chapter 6, page 93 *Safe School Officers*

18.	The legislature should mandate that only Florida sheriffs may conduct guardian training. The training may be conducted by the sheriff of the county where the school is located or another Florida sheriff.	<b>PARTIALLY COMPLETE</b>
19.	The legislature should mandate that guardian training be conducted by “active” CJSTC instructors.	<b>PENDING</b>
20.	The legislature should mandate that a portion of the firearms training include night and low-light shooting conditions.	<b>PENDING</b>
21.	The legislature should mandate that all guardians may undergo the same psychological evaluation currently required for law enforcement officers and those evaluations are conducted by licensed professionals.	<b>PENDING</b>

52



**Second Report: Chapter 6, page 93**  
***Safe School Officers***

22.	Current law requires evaluations be conducted by “FDLE-designated” professionals. FDLE does not designate anyone to perform these functions and this should be removed from the statute.	<b>PENDING</b>
23.	Law enforcement officers employed by a school board police department should be required by law to attend Crisis Intervention Team (CIT) training.	<b>COMPLETE</b>



**Second Report:**  
**FSSAT**



## Second Report: Chapter 7, page 98

### *FSSAT*

24.	Schools must assess site security at least annually and use the FSSAT to develop a remedial plan.	<b>COMPLETE</b>
25.	All schools and district must comply with the law and submit FSSATs in a timely manner.	<b>COMPLETE</b>
26.	The FDOE Commissioner and Board of Education should have sanction authority over the superintendent and school board for non-compliance with FSSAT submission requirements.	<b>PENDING</b>

55



## Second Report: Threat Assessments

56



**Second Report: Chapter 8, page 106**

***Threat Assessments***

27.	It should be a priority for the legislature to criminalize making a threat to commit a mass shooting, especially a verbal threat. The Commission supports House Bill 311.	<b>NOT ADOPTED</b>
28.	Law enforcement agencies and school districts must work collaboratively to implement effective, meaningful and timely threat assessment processes. Only threat assessment-trained officers/deputies should participate on a TAT, not patrol officers/deputies.	<b>ONGOING</b>
29.	School TATs should have permanent members, including mental health practitioners, to ensure consistency. If possible, non-school mental health providers, DJJ and/or DCF should participate when they have unique knowledge of the subject.	<b>ONGOING</b>

57



**Second Report: Chapter 8, page 106**

***Threat Assessments***

30.	The legislature should mandate that all statutorily required members of the TAT must be present from start to finish during the process, including the disposition decision.	<b>COMPLETE</b>
31.	Local threat assessment teams should develop a process to ensure that all relevant information on a subject is obtained in order to facilitate an effective threat assessment. Law enforcement agencies should consider dedicating an analyst to conduct this research.	<b>PENDING</b>

58



## Second Report: SESIR

59



### Second Report: Chapter 9, page 118 *SESIR*

<b>32.</b>	<p>SESIR guidelines should be changed to clearly indicate when law enforcement should be consulted or when an incident is reported to law enforcement. Both of these instances should be effectively tracked as well as whether an official police report was generated. This is not a recommendation to inhibit officer discretion.</p>	<b>PENDING</b>
<b>33.</b>	<p>SESIR guidelines should require gathering and reporting of law enforcement data such as the date/time of law enforcement notification, name of officer and case/report/incident number.</p>	<b>PENDING</b>
<b>34.</b>	<p>SESIR should clarify law enforcement reporting guidelines to “will notify law enforcement” for the more severe incidents and “may not need to include notification to law enforcement” for the less severe.</p>	<b>PENDING</b>

60



**Second Report: Chapter 9, page 118**

***SESIR***

<p>35. The three SESIR categories dealing with physical violence should be consolidated to two categories which closely mirror the criminal definitions of battery and aggravated battery. Both of these categories should require notification to law enforcement.</p>	<p><b>PENDING</b></p>
---	-----------------------



**Second Report:  
Integrated Data and Social  
Media**



**Second Report: Chapter 10, page 128**

***Integrated Data and Social Media***

36.	Threat assessment teams need to be educated to understand the limitations of the FSSP and its capabilities.	<b>PENDING</b>
37.	Agencies should consider a dedicated research component that supports TATs to ensure comprehensive data is acquired.	<b>PENDING</b>
38.	The social media monitoring tool should be renamed to reflect that it is not “actively” monitoring social media.	<b>NOT ADOPTED</b>
39.	The social media search should allow FSSP users to run keyword and username searches of the data.	<b>NOT ADOPTED</b>
40.	Require school districts to provide school nicknames (e.g., MSDHS) and other relevant information to enhance the social media tool.	<b>NOT ADOPTED</b>

63



**Second Report: Chapter 10, page 128**

***Integrated Data and Social Media***

41.	SESIR data quality and frequency needs to be improved if it is to be of value to FSSP users.	<b>PENDING</b>
42.	Preparation for TATs should be a ground up process where agencies first collect locally accessible information and then use the FSSP and other information sources to augment their information.	<b>PENDING</b>
43.	TAT members should have a well-developed list of sources of information and data from their discipline (LE, schools, mental health) that should be prepared and reviewed for the TA meeting.	<b>PENDING</b>
44.	Before any additional money is spent to consolidate data, time should be spent to evaluate how the process is working with the data currently available to the teams and the systems that have been put in place.	<b>ONGOING</b>

64



**Second Report: Chapter 10, page 128**  
***Integrated Data and Social Media***

45. Further research is required to determine the best way to manage students who have been identified as threats. This includes resources needed to manage them and how the management will be transferred when the student ages out of the school system.	ONGOING
---	---------



**Second Report:**  
**Juvenile Diversions**



## Second Report: Chapter 11, page 138

### *Juvenile Diversion*

46.	The Commission supports most of DJJ's recommendations in its July 2019 report. However, the Commission recommends the legislature prohibit schools from creating and/or operating any juvenile pre-arrest diversion program that is not consistent with F.S. 985.12. This will facilitate continuity between State Attorney-led programs and school programs.	<b>COMPLETE</b>
47.	DJJ should continue its efforts to provide easy and direct access to Prevention Web for all law enforcement officers and the legislature should support DJJ in its effort with necessary funding.	<b>PENDING</b>

67



## Second Report: Mental Health

68



**Second Report: Chapter 12, page 151**

***Mental Health***

48.	The legislature should consider additional mental health funding and require that entities receiving State funding report data-driven and outcome-based performance metrics establishing effective use of the State money.	<b>PENDING</b>
49.	The legislature should authorize State funding through which all mental health providers are required to participate in care coordination with other public and private providers, especially school-based providers. Expectations and performance measures should be established for all providers to ensure proper and necessary care coordination.	<b>PENDING</b>

69



**Second Report: Chapter 12, page 151**

***Mental Health***

50.	The legislature should require that school districts engage community mental health providers that receive state funding to participate in the coordination of student treatment plans and the elimination of multiple treatment plans between school and non-school providers.	<b>PENDING</b>
51.	The legislature should establish and require the implementation of master case management systems for high-utilizers of acute care statewide.	<b>PENDING</b>
52.	The legislature should require DCF, DJJ and AHCA to develop an alert system to identify those individuals who are repeatedly Baker Acted. The responsible entity must develop a course of action to address why the person is repeatedly Baker Acted.	<b>PENDING</b>

70



**Second Report: Chapter 12, page 151**

***Mental Health***

53.	The legislature should hold DCF and AHCA accountable to ensure outcome-driven results and require holistic responsibility for system recidivists, with a focus on timely access to care coordination and high-end utilization reduction.	<b>PENDING</b>
54.	The legislature should consider implementing juvenile mental health and wellbeing courts and provide judges with more progressive tools and consequences to better engage children in mental health treatment.	<b>PENDING</b>
55.	Programs, such as Community Action Treatment (CAT) teams, should be enhanced, and expanded where necessary, to provide better continuity of behavioral health services to close the gap when high-risk children transition into adulthood.	<b>PENDING</b>

71



**Second Report: Chapter 12, page 151**

***Mental Health***

56.	Schools should be required to implement evidence-based mental health and behavioral education designed to help youth develop empathy for others, learn how to make decisions, problem solve, resolve conflict, advocate for themselves in an appropriate way, develop self-esteem, and identify and handle their emotions. It should start with Pre-K and continue through 12th grade.	<b>PENDING</b>
-----	--	----------------

72



## Second Report: FERPA

73



### Second Report: Chapter 13, page 162

#### *FERPA*

<b>57.</b>	FDOE should prepare and present comprehensive FERPA and other privacy law training to all school district, school board and law enforcement legal counsel.	<b>PENDING</b>
<b>58.</b>	The legislature should require that Florida Safe School funding to be tied to the lawful real-time access to school security video by law enforcement agencies and the proper sharing of videos and photos by school districts with law enforcement.  In order to receive Safe School Funds the district must have agreements that allow LE access to video feeds (if the agency desires and has the necessary technology) and the district's legal counsel and administrators attend FDOE developed FERPA training.	<b>NOT ADOPTED</b>

74



# **Analysis of Recommendations in MSDPSC Reports**

**First report: January 2019  
Second Report: November 2019**

75



## **Analysis of Recommendations in First MSDPSC Report—January 2019**

### **Physical Security—Chapter 3/Page 83**

- 1.** It is recommended that districts implement a tiered approach to campus hardening that begins with basic harm mitigation concepts that are of little or no cost and those that may be implemented quickly. After basic concepts have been implemented, districts should then consider more advanced security measures, specifically those focusing on prevention and those that involve technology and/or law changes. Tables 1 through 4 in Appendix B provide a suggested level-based approach to enhancing campus site security.
- 2.** Further, there are a number of subject matter experts and organizations that provide expert advice on school hardening. The State should engage these experts through the FDOE Office of Safe Schools (OSS) to establish guidelines and best practices for campus hardening across Florida.
- 3.** The OSS should also conduct a complete review of target-hardening practices currently or planning to be utilized, recommendations highlighted in other state’s school safety reports, and those developed by organizations such as the Partner Alliance for Safer Schools.
- 4.** Prior to August 2019, the OSS, using this review and information received from experts, should provide the districts with a tiered list of best practices that will allow schools to develop a plan to enhance and phase in security levels over time as budgets and resources allow. The list should be reviewed and revised annually as new technologies are identified. This recommendation does not mean districts should wait to implement reactive harm- mitigation policies, procedures or best practices, such as requiring hard corners or safe areas in every classroom in the state.
- 5.** The legislature should also consider creating a permanent body in the vein of the Connecticut School Safety Infrastructure Council to oversee physical site security of schools. The Connecticut legislature created this Council of subject matter experts to oversee school security infrastructure, provide consistency and ensure compliance with

best practices.

6. Based on the incident, all Florida school districts must implement the following harm-mitigation strategies immediately. 7. The Florida Legislature needs to mandate compliance with these strategies and establish consequences and significant sanctions for non-compliance, including financial sanctions and removal from office.

- a) School security is the function of all school personnel and students. All staff should have clearly established roles and responsibilities that are outlined in a written policy and procedure manual provided to all personnel. The school security staff and/or “safety team” should regularly meet and train on proper protocols and procedures in emergency situations and coordinate with law enforcement.
- b) All school campus gates must remain closed and locked, and when opened for ingress and egress they should be staffed to prevent unauthorized campus access.
- c) Doors leading to instructional classrooms or student-occupied space and for ingress/egress to campus or a specific building should remain locked during school hours, and if they are open they should be staffed. All teachers should be able to lock doors from within the classroom, and keys should be on their person at all times.
- d) Every district and school should have a written, unambiguous Code Red or similar active assailant response policy that is well known to all school personnel, parents and students. The policy must make unequivocally clear that all personnel are empowered to activate emergency active assailant response procedures and that those procedures are to be immediately implemented upon notification.

- e) Every school must have an effective communication system through which everyone on campus can see and/or hear—and immediately react to—a called Code Red or similar active assailant response notification.
- f) Classrooms should establish safety measures, such as hard corners or other safe areas, and teachers should have the ability to cover door windows quickly.
- g) Schools should evaluate and give consideration to the appropriateness of locking bathrooms doors.

**8.** All districts should establish a system to ensure compliance and accountability with these requirements and consequences for noncompliance.

#### **SROs—Chapter 4/Page 101**

**9.** BSO and all law enforcement agencies should ensure their SROs are part of a single unit and that they are closely supervised. A single unit and centralized supervisory structure provides SRO supervisors the ability to effectively communicate with and evaluate the officers and deputies at the various schools.

**10.** It should be made clear to all stakeholders that the primary responsibilities of the SRO shall be the enforcement of the laws and the safety and security of the campus, students and school personnel. The SRO may still have teaching and counseling duties, but these are secondary to that of safety and security.

**11.** SRO contracts between the law enforcement agencies and school boards should require a high level of information sharing between the SRO and school administrators. The contract should also state that: 1) the SRO or applicable law enforcement agency shall have access to educational/disciplinary records provided by the school; 2) decisions regarding law enforcement actions are solely within the discretion of law enforcement officers and that school administrators shall not interfere with law enforcement decisions; and 3) have consistent operating procedures, staffing levels and clearly defined roles and responsibilities for the SRO and school personnel.

**12.** All SROs should be issued patrol rifles and ballistic vests and have those items immediately available to them on school campuses.

**13.** School Resource Officers (SROs) should receive frequent, thorough and realistic training to handle high-risk, high stress situations, especially single-officer response training.

**14.** SROs should be among the most well-trained and well-equipped law enforcement personnel to confront active-shooters. In order to do so, SROs should receive annual training in this area.

**15.** The SRO's immediate supervisor should regularly walk the school with each SRO to discuss the layout of the school and to identify vulnerable target areas and effective methods of response.

**16.** SROs should receive adequate training on records laws, and there should be a required number of hours focusing on trauma-informed care, socio-emotional learning, restorative justice problem solving and cultural competence.

**17.** There shall be a minimum of at least one law enforcement officer on every middle and high school campus and a minimum of one law enforcement officer or guardian on every elementary school campus. Each allocation of law enforcement officer/guardians must be staffed sufficiently to provide for an immediate backup and an appropriate and timely response consistent with the circumstances of an emergency situation.

**18.** School districts and charter schools should permit the most expansive use of the Guardian Program under existing law to allow personnel—who volunteer, are properly selected, thoroughly screened and extensively trained—to carry concealed firearms on campuses for self-protection and the protection of other staff and students.

**19.** School districts and charter schools should not restrict the existing Guardian Program only to dedicated guardians, and all districts should expand the guardian eligibility to other school employees now permitted to be guardians.

**20.** Further, the Florida legislature should expand the Guardian Program to allow teachers who volunteer—in addition to those now authorized—who are properly

selected, thoroughly screened and extensively trained to carry concealed firearms on campuses for self- protection, and the protection of other staff and students in response to an active assailant incident.

**21.** The Legislature should modify Florida Statute 30.15 (1)(k) to state that upon, a majority vote of the School Board, the sheriff shall establish a Coach Aaron Feis Guardian Program to aid in the prevention or abatement of active assailant incidents on school premises.

**22.** The Florida Legislature should: increase safe schools allocation for school resource officers and/or guardians, provide adequate recurring funding for the Guardian Program and consider increased funding for individuals who are hired solely to fill the role of guardian; allow for the use of school safety funding between different categories based on need and amend current version of Senate Bill 7026 to allow for safe schools allocation to be used for new or existing school resource officers; and restore local authority to public school boards to levy up to a half mill without a referendum for law enforcement officers or guardians, or other direct school security expenses.

#### **Law Enforcement—Chapter 5/Page 202**

**23.** The Broward County Sheriff’s Office should conduct a thorough internal review and address all of the actions or inactions of personnel on February 14, 2018.

**24.** The Broward County Sheriff should conduct an internal review into the conduct of deputies Kratz, Eason, Stambaugh, Perry, Seward, Goolsby and Sgt. Miller. If there is cause to believe their actions violated agency policy, the Sheriff should conduct a formal internal affairs investigation and take whatever action he deems appropriate.

**25.** All Florida public schools, including charter schools, specifically the Broward County school system, should immediately provide law enforcement with live and real-time access to all school camera systems. The schools districts should provide law enforcement with adequate training to access and operate the cameras.

**26.** All Broward County law enforcement and fire/EMS agencies should establish protocols for a unified command at all MCIs or similar incidents. Every Florida county should be required to have a major incident unified command inter-local agreement that

establishes the protocols for a unified command structure. The incident commander shall be present at the command post and follow established Incident Command System protocols.

**27.** A staging area outside the command post shall be standard protocol for meeting arriving elected officials.

**28.** BSO should revise its active assailant policy to make unequivocally clear that deputies are expected to immediately seek out an active assailant and that “containment” is not the policy of BSO.

**29.** BSO should increase the frequency of its active assailant training. With the number of deputies who cannot recall the training or recall the last time they attended, it does not seem to be resonating with deputies, especially those who responded to MSDHS.

**30.** CJSTC and individual law enforcement agencies should require single-officer response to active assailant training.

**31.** All law enforcement agencies must have a proactive active shooter response policy, which includes immediately responding to and stopping the threat.

### **Fire Department/EMS—Chapter 6/Page 213**

**32.** Self-deployment is going to occur in any significant event, and it must be managed. Law enforcement and fire departments in each county should have established agreements governing self-deployment and establishing response protocols to avoid inappropriate deployments.

**33.** Law enforcement agencies are encouraged to formalize Rescue Task Force protocols with fire/EMS agencies and to train with them on a regular basis.

**34.** Fire and EMS providers must be part of the unified command at any MCI or other significant event, and fire/EMS should not have a separate command post from law enforcement.

### **Law Enforcement Communications—Chapter 7/Page 230**

35. Law enforcement agencies should be required to have communications interoperability with all other law enforcement agencies in their county. The methodology for accomplishing this is immaterial, but the interoperability is essential.
36. If an agency asks another agency for access to their primary dispatch radio channels, it should be mandated that the agency honor the request.
37. Law enforcement agencies should tactically train their personnel so they are familiar with all radio functionality.
38. Florida law should require that all primary 911 call centers have the ability to directly communicate via radio with the first responder units for which they are receiving 911 calls without having to transfer calls.
39. All public safety agencies should work toward consolidation of 911 call centers and eliminate the 911 call transfer process.
40. School districts and law enforcement agencies should strive for radio interoperability.

### **BCPS Actions Related to the Incident—Chapter 8/Page 265**

41. The Broward County Public Schools should conduct an internal investigation regarding Assistant Principal Jeff Morford to determine whether information was known and/or reported to him regarding Cruz that he should have acted on, and if he had that knowledge whether he violated any District policies. BCPS should take appropriate action it deems necessary as a result of its investigation.
42. It is extremely important that people report concerning behavior that they see and hear, and, in order to do so, reporting platforms must be easily accessible and anonymous. FortifyFL was recently unveiled by the State and is an excellent opportunity for everyone to report concerning activity that will be immediately received by law enforcement.
43. Schools should be required to notify students of FortifyFL, promote its use by

advertising the app on campus and in school publications and install the app on all student-issued computer devices. Education about and publication of reporting platforms must be continuous and ongoing by the schools. Future updates to the application should explore the possibility of two-way live dialogue functionality.

**44.** Every school district should implement a policy that requires its personnel to report all indicators of suspicious student behavior to an administrator. The administrator should be required to document the report and his/her disposition of the information (e.g. referred to threat assessment team, unsubstantiated). The policy should require that the disposition of all threats of school violence be reviewed at least by the school's principal—if not by a higher authority—and reported to the threat assessments team, which has mandatory law enforcement participation.

#### **Mental Health—Chapter 9/Page 272**

**45.** The issues surrounding mental health care are complex. The Commission will address this area further and provide additional recommendations beyond those detailed below to the legislature by January 15, 2020.

**46.** The legislature should amend Section 394.4615 of the Florida Statutes and require that mental health providers release pertinent clinical information related to the threat and require that they warn others of threatened harm by a patient. Currently, the duty to warn is permissive, and warning is not required. The law should require that the provider notify law enforcement and that law enforcement warn the person threatened as necessary to protect their safety.

**47.** School districts should be required to establish agreements with Community Behavioral Health Providers to provide in-school mental health services in order to increase system collaboration, to improve clinical/behavioral information sharing, and to ensure availability and continuation of mental health care for youth and families when school is not in session.

- 48.** To the extent permitted by law, including exceptions that generally prohibit the release of protected health information, private providers should share information with school-based providers and coordinate care.
- 49.** The sharing of information should be mandated when there is a threat of harm to school personnel and/or students.
- 50.** Schools should be required, as permitted, to share student mental health information with community-based providers.
- 51.** School mental health and counseling records should be included in each student's school record, and that record should accompany the student to each school they attend within the district, as well as follow the student if they switch districts.
- 52.** Based on the current laws and rules in place, rulemaking from the Department of Health (DOH) and/or legislative action would likely be required to mandate that mental health records travel with the student. Additionally, there is an ongoing legal workgroup related to Senate Bill 7026, which is researching, among other items, the legal capabilities of the data sharing required by Senate Bill 7026; it may be beneficial to collaborate with the workgroup and DOH on this issue.
- 53.** The legislature should require by statute that any student referred for developmental delay and/or behavioral issue testing and screening be tested within 45 days of the referral, and that the student be provided a referral for resources and/or services within 30 days of the testing/screening if needed.
- 54.** Consider targeted case management for children and young adults (ages 13 – 25) who are high utilizers of mental health services, who are receiving school- and community-based mental health services and/or who have been identified as a potential threat in the school environment to improve information sharing and ensure coordination of services.
- 55.** Use a blended funding approach to SEDNET using school- and community-based behavioral health funding sources to facilitate cost sharing and improve information sharing and care coordination of school- and community-based intervention services.

**56.** All juvenile pre-arrest diversion programs, to include all school-based diversion programs that address criminal conduct, must be part of and operated consistently with the pre- arrest diversion program criteria established by the state attorney and other stakeholders in each judicial circuit. Any school-based diversion program must be defined in school policy and approved by the district school board.

**57.** While each circuit has authority to establish criteria for diversion programs, circuits should consult with each other in an effort to create as much consistency statewide as possible. Program criteria, at minimum, should include:

- a.** Establishment of an assessment protocol and referral process. Requirements for follow-up and notification of noncompliance to the state attorney’s office.
- b.** Limitation on the maximum number of referrals for eligibility to participate in a pre- arrest diversion program.
- c.** Requirement for diversion program referrals to be cumulative and eliminate a “reset” each school year for offenses counted for diversion programs.
- d.** Requirement that all pre-arrest diversion programs report data to DJJ in Prevention Web\* or another common database in an effort to eliminate information silos. (\*Legislative appropriation will be required to modify DJJ’s Juvenile Justice Information System to accept additional data).
- e.** Specify that nothing in the criteria shall limit a law enforcement officer from making an arrest or interfere with a law enforcement officer’s authority to enforce the law. Law enforcement shall retain discretion to decide if an arrest should be made.

**Threat Assessments—Chapter 11/Page 285**

**58.** The BCPS should investigate Morford’s conduct surrounding the Cruz threat assessment process and take whatever action it deems appropriate based on its investigation. If Morford’s conduct is found to have not violated policy, the policy should be modified. The District should also investigate whether Principal Ty Thompson’s disengagement from the threat assessment process and failure to ensure he was knowledgeable about threats on campus violated District policy.

**59.** BCPS should immediately evaluate the implementation of its threat assessment process and training and determine if there is a districtwide problem with how threat assessments are conducted or whether the problem is isolated to MSDHS. Immediate remedial action is necessary. The BCPS threat assessment process is reactive; it needs to be proactive so that the TATs obtain information about concerning behavior before they manifest into actual threats. The TATs should seek out information and not merely wait for reports from staff or students. This applies to TATs across all Florida schools.

**60.** The guiding principle for the threat assessment process should be behavior, not an actual threat. The traditional reactive threat assessment process is one that focuses more on actual threats as opposed to identifying concerning behaviors and intervening early. The most successful threat assessment process is proactive and often requires tying together disparate behaviors so they may be evaluated in the aggregate, viewed holistically and acted upon at the earliest possible time.

**61.** The TATs should have dedicated positions/members. Rotating TAT members does not allow for consistency, and personnel do not gain the necessary experience when rotated on and off the TATs. However, temporary members should be used to supplement the team, if needed, to provide specific information or knowledge.

**62.** There should be District oversight of the TAT process and District-level review of all Level 2 assessments. Principals should be required to be informed of every threat assessment, and the principal should approve the disposition of every assessment.

**63.** The Florida DOE should develop a standardized, statewide behavioral threat assessment instrument and create a statewide threat assessment database that is accessible to all districts and appropriate stakeholders. Florida should consider the model used by the State of Virginia, which is widely recognized as the leader in school-based behavioral threat assessment.

**64.** The legislature should pass a bill requiring this process be implemented by FDOE by a certain date. FDOE should be provided oversight authority for the threat assessment process.

**65.** All TATs should be comprised of specific (static) members, with at-large positions in each case for school personnel with personal knowledge of the child. TATs should be required to meet at least monthly and be proactive, not just reactive. The TATs should receive regular training on threat assessments.

**66.** TATs should be required to convene within 24 hours of receiving a referral when school is in session. If school is not in session, the TAT must refer the matter to law enforcement for evaluation, and the TAT must meet no later than the end of the first day school is back in session to consider the matter and ensure it is resolved.

**67.** All school personnel should receive mandated training on behavior indicators that should be referred to the TAT for assessment. Reporting observed behaviors to the TAT should be mandatory. There should be sanctions for non-reporting.

**68.** There must be adequate resources to which the TAT can refer a child—the TAT is a problem identifier and not a problem solver.

### **ESE and Educational Services—Chapter 12/Page 293**

**69.** There should be a Florida workgroup established to determine necessary changes to federal law regarding ESE and then coordinate with the Florida congressional delegation to request the identified changes. State law changes can follow if federal law is revised.

**70.** School personnel must be properly trained on their ESE obligations under federal and state law so that the requirements are not under- or over applied.

**71.** Threat Assessment Teams and IEP committees must coordinate information and courses of action regarding ESE students.

**72.** Students with IEPs that involve severe behavioral issues should be referred to and evaluated by the threat assessment team.

### **FSSAT—Chapter 13/Page 296**

**73.** The legislature should require that the FSSAT be the primary instrument used by

the school districts to assess physical site security.

**74.** The Florida legislature should provide FDOE with compliance authority over the districts to ensure that each school, and each district as applicable, submits an annual FSSAT.

**75.** FDOE should be tasked with, and funded for, providing each district with training on how to assess physical site security and how to properly complete the FSSAT.

**76.** Each site assessment should be required to be conducted in conjunction with law enforcement.

**77.** The annual districtwide FSSAT should specifically set forth the physical site security priorities for the district in descending order of priority. The FSSAT should also explain what progress was made in implementing the previous year's FSSAT priorities.

**78.** It should be required that any significant deficiencies identified during the FSSAT assessment process that adversely affect the safety and security of any school campus or facility must be reported in a timely manner to the school board, and a remedial plan should be approved by the board.

**79.** The legislature should provide statutory sanctions for non-compliance with the annual FSSAT submission requirement.

**80.** The legislature should require that the school-specific FSSAT be approved by the superintendent or his/her designee before submission to FDOE. The designee must be a deputy/assistant superintendent or the district's school safety specialist.

**81.** The current school-specific and districtwide FSSAT should be revised with stakeholder input, especially from law enforcement and industrial security experts.

### **Information Sharing—Chapter 14/Page 313**

**82.** There needs to be extensive training provided to all stakeholders on the appropriate application of FERPA, HIPAA and other often-misunderstood and over applied laws.

The over application of these laws and the barriers thus imposed must cease. Knowledge of the laws' exceptions are as equally important as their initial applicability.

**83.** HIPAA and 42-CFR are subject to interpretation, which can be unnecessarily detrimental. The State of Florida should research and offer a correct interpretation for providers to follow and provide resources for providers to access when information sharing is in question.

**84.** The Florida legislature should consider changes to Florida school privacy laws that are not preempted by federal law to better allow information sharing in appropriate circumstances, and to encourage changes to federal law.

**85.** The Florida congressional delegation should evaluate FERPA, HIPAA, 42-CFR and other federal laws and sponsor changes to those laws that will allow broader information sharing and public disclosure.

**86.** SESIR reporting requirements to FDOE and law enforcement should be evaluated and increased. Several types of incidents—such as robbery—that are not currently required to be reported to law enforcement should be required reportable offenses.

**87.** School Districts must ensure that each school accurately reports all required SESIR incidents and that underreporting is eliminated. School districts should be held accountable for accurate reporting, and the districts should hold their administrators accountable.

**88.** The legislature should provide FDOE with SESIR oversight authority and authorize FDOE to impose sanctions on districts that do not accurately report required data. FDOE should be provided inspection authority of districts' records and be required to conduct audits to ensure compliance.

**Reunification—Chapter 3/Page 46**

1. Every law enforcement agency should have a mass casualty death notification and reunification policy. Seminole County Sheriff's Office's policy and practices should be considered as a model for law enforcement agencies to adopt.
2. Every policy must have an effective command-and-control structure that identifies an on-site individual to supervise the reunification and reporting process.
3. Agencies should consider the parents' recommendation that families be provided with tentative decedent identifications to provide more timely notifications. There are differing views on this recommendation, and the decision whether to provide families with tentative decedent identification or wait for final identity confirmation must be made on an individual agency and case-by-case basis.
4. Family members should be provided with regular updates on the status of victim identification.
5. Agency policies should include the pre-identification of the various victim advocate services available and detail how to activate those services immediately upon the incident occurring. Victim advocate services are available through local, state and federal agencies, and services at all levels should be engaged.
6. School districts, law enforcement agencies and hospitals should collaborate and develop coordinated best practices for effective death notification and family reunification. Sheriff's offices and police departments should consider a single countywide policy for consistency across each county.
7. Critical incident stress debriefing should be mandatory for officers and all personnel, including school personnel, who respond to a mass casualty event and/or who participate in the family reunification efforts.
8. Every school district should have a plan, set forth in policy, which addresses reunifying students and staff with their families in an emergency situation. Because each school is unique, each

individual school should also have a school-based reunification plan that is consistent with district policy. The district's policy should minimally address: identification of potential reunification sites; training for employees; multiple methods to effectively communicate with family members of students/staff; and methods to aid law enforcement in student/staff identification. School districts must coordinate with law enforcement, fire rescue, and emergency medical service agencies in the creation of their policies to ensure there is a unified command at the reunification site. Seminole County Public Schools' policy and practices should be considered as a model for all school districts to adopt. Technology-based programs are available to facilitate reunification. However, school districts should also maintain written back-up documents that will facilitate reunification.

**9.** Every district plan should identify potential reunification sites, training for employees, equipment, signage and student/parent information to facilitate the process.

**10.** A unified command structure should be incorporated in the plan, particularly in a mass casualty incident where multiple agencies are involved.

**11.** Training and practical exercises are important components of effective plans. The reunification plan should also include required after-action reports and where appropriate, updating protocols based on the critique contained in the after-action report. Training and practical exercises should be conducted with partner agencies, such as police, fire, emergency management, victim advocates, mental health counselors and other team members who would be included in the response.

#### **Broward Regional Communications—Chapter 4/Page 74**

**1.** All regional communications stakeholders have a vested interest in the system's success, and they must put aside their personal animosity and fulfill their obligations to the citizens of Broward County to provide effective, efficient and safe radio and 911 communications.

**2.** All those in public safety leadership positions must convey to their subordinates an expectation that the Regional Communications system will succeed and that everyone will put aside their differences and work collaboratively to achieve that result.

3. The City of Hollywood and Broward County must immediately reconcile their differences and agree on a tower site on the east side of Hollywood so that the County can complete the installation of its law enforcement radio system.
4. BSO and the County should address the operational concerns raised by Regional Communications Center employees in the 2016 and 2019 surveys and ensure that the Broward County 911 centers are fully prepared, trained, equipped and able to handle all emergency situations, including mass casualty events.
5. The county administrator and ORCAT director should address the concerns raised by the Regional Communications Center employees in the 2016 and 2019 surveys about poor technology and response to problems with the technology. They must ensure that the employees of the Regional Communications Center are provided with capable, reliable and efficient technology and that any problems with the technology are resolved promptly.
6. The cities of Margate and Coconut Creek should consider abating their withdrawal from regional communications and work with the sheriff and county administrator to meet their operational needs and expectations to avoid regressing back to a bifurcated emergency communications system and spending millions of dollars in taxpayer money to join another system. If the problems are not resolved in a reasonable amount of time, the cities can then resurrect their withdrawal plans, but they should make another effort at success before doing so.
7. The Florida Legislature should craft language either specific to Broward County and the City of Hollywood or in the broader manner, which in a similar circumstance will give the Governor the authority to declare that a communications tower may be placed on any land within the State of Florida if it is in the best interest of public safety. The legislative language should be crafted to ensure compliance with any other competing existing law.

#### **Active Assailant Policies and Procedures—Chapter 5/Page 83**

8. The legislature should mandate that all schools include age appropriate decision-based/option-based drills in their training. In order to minimize complacency and drill fatigue, the law should

require that every drill in any given school year be comprised of a unique set of circumstances that requires faculty and students to consider the response to that specific threat.

**9.** The legislature should mandate the specific minimum number of emergency and fire drills that take place during every school year at every elementary, middle, high and charter school. All students, faculty, Guardians, SROs, SSOs and volunteers must participate in the drills. Real-world events qualify as a drill for purposes of meeting the appropriate number of drills. For purposes of this recommendation, emergency drills are defined as the response to active threats/assailants, hostage incidents, bomb threats, severe weather, reunification drills, high-risk police activity in close proximity to schools, etc. Law enforcement officers must be physically present on campus and directly involved in the execution of all active assailant drills. At least some emergency drills should require movement and exercise all necessary aspects of the drill and emergency operations plan, including panic buttons, simulated communications with first responders, notification to parents of the drill, student/faculty movement, turning lights off, covering windows, etc. Elementary schools are to conduct six fire drills and six emergency drills every school year. Middle and high schools are to conduct four fire drills and six emergency drills every school year. On every campus, the first fire and emergency drills (these are to be separate drills) shall take place within the first ten days of school. The remaining fire and emergency drills shall take place no later than every 45 days that school is in session.

**10.** With regard to elementary schools, the legislature should mandate that four of the six fire drills involve evacuating the building to the designated meeting location outside of the building. These meeting locations should vary to minimize drill fatigue and the creation of unnecessary exposure to active threats/assailants. Two of the six fire drills can be fire prevention training with content designed by the SFMO/FDOE, but only after a minimum of two physical drills has occurred. Of the six emergency drills, four of the drills must address active threats (active assailant, hostage, bomb threat, etc.). Two drills must address events such as severe weather, natural disasters, reunification, etc. Special consideration must be given so that all drills for elementary-age students are developmentally appropriate. The Commission recommends that the emergency drills differ in presentation and practice for kindergarten through second grade and third grade through fifth grade; however, they must occur concurrently.

**11.** With regard to middle and high schools, the legislature should mandate that three of the four fire drills involve evacuating the building to the designated meeting location outside of the building. These meeting locations should vary to minimize drill fatigue and the creation of unnecessary exposure to active assailants. One of the drills can be fire prevention training with content designed by the SFMO/FDOE, but only after a minimum of two physical drills has occurred. Of the six emergency drills, four of the drills address active threats (active assailant, hostage, bomb threat, etc.). Two drills must address events such as severe weather, natural disasters, reunification, etc.

**12.** The legislature should mandate that ESE students and exceptional student centers be afforded some leeway in these requirements but that the district offices maintain strict oversight of these accommodations to ensure faculty is doing all that it reasonably can to ensure the safety of these students by meeting the requirements placed on all other schools/faculty. All self-enclosed ESE classes and ESE/Exceptional Centers need to observe their student's response to auditory and visual drill protocols to accurately assess what challenges they would have during an active assailant incident.

**13.** The legislature should mandate that each school completes an after-action report subsequent to every fire and emergency drill on campus. The active assailant drill after-action reports must be completed in conjunction with law enforcement. This report should document successes of the drill and identify any problems or obstacles so the issues may be addressed and resolved within 30 days. Those after-action reports shall be forwarded to the district office for review by the superintendent or his/her designee.

**14.** The legislature should provide the state Board of Education with the authority to establish consequences for non-compliance with laws passed as a result of the legislative recommendations in this section.

**15.** A best practice is for law enforcement officers assigned to patrol operations become familiar with the schools in their assigned area. This includes familiarity with the fire and emergency drills on those campuses. The law enforcement officers should respond to the schools during fire and

emergency drills in order to provide security for the students and staff and to gain familiarity in preparation for an actual emergency.

**16.** The timeliest way to communicate an on-campus emergency is direct reporting from a school staff member to everyone on campus and the 911 center simultaneously.

**17.** All Florida public schools should utilize plain language when conducting drills and in emergency incidents. All subsequent announcements and communications should be given in plain language.

### **Safe School Officers—Chapter 6/Page 93**

**18.** The legislature should amend the statute to make it unequivocally clear that only Florida sheriffs may conduct the guardian training. The training may be conducted by the sheriff of the county where the school is located or by the sheriff of another county, but all training must be completed by a sheriff.

**19.** The legislature should amend the law to make it clear that all guardian training be conducted by “active” CJSTC instructors. The current law only requires that someone be a CJSTC instructor (Line 259 of Senate Bill 7030), and this amendment will eliminate any ambiguity that the instructor must hold an active (current) instructional certification.

**20.** The legislature should amend the guardian training requirements and require that a portion of the firearms training include night and low-light shooting conditions.

**21.** The legislature should amend the statute to state that all guardians and school security guards may undergo the same psychological evaluation currently required by law for school resource officers and school safety officers (law enforcement officers) in the state of Florida, and that such evaluations be conducted by licensed professionals.

**22.** Current Florida law requires that psychological evaluations of guardians be conducted by “FDLE-designated” professionals. FDLE does not and has never designated anyone to perform these evaluations, and this requirement should be deleted from the statute.

**23.** SROs (city police officers or deputy sheriffs) are required under current law to attend Crisis Intervention Team (CIT) training. School Safety Officers (law enforcement officers employed by

a school board police department) are not currently required to attend CIT, and the legislature should amend the law to require that School Safety Officers attend CIT training.

### **FSSAT—Chapter 7/Page 98**

**24.** It is imperative that all Florida schools assess their physical site security at least annually and use the FSSAT to develop a remedial plan that addresses deficiencies and improves school hardening.

**25.** All schools and school districts must comply with the law and submit all school-specific and districtwide FSSATs in a timely manner.

**26.** The Commissioner of Education and State Board of Education should have sanction authority over the superintendent and school board for non-compliance with FSSAT submission requirements.

### **Threat Assessments—Chapter 8/Page 106**

**27.** It should be a priority for the legislature to amend Florida law to include as a criminal offense any type of a threat to conduct a mass shooting, etc., especially a verbal threat. The Commission supports the legislation proposed in House Bill 311 making it a felony to verbally threaten a mass shooting.

**28.** Law enforcement agencies and school districts must work collaboratively to implement effective, meaningful and timely threat assessment processes using properly trained personnel. Only threat assessment-trained officers or deputies should participate on a threat assessment team, and patrol officers or deputies should never be dispatched to a school as a “call for service” to participate on a threat assessment team.

**29.** School behavioral threat assessment teams should have permanent members, including mental health practitioners, to ensure consistency in the process. If possible, non-school mental health providers, DJJ and/or DCF representatives should also participate on threat assessment teams when they have unique knowledge of the person who is the subject of the assessment.

**30.** In order to ensure that all statutorily required threat assessment team members meaningfully participate in the threat assessment process from beginning to end, and that nobody “signs off” on a threat assessment after the fact, the legislature should amend Florida Statute 1006.07(7)(a) to

state that all statutorily required members of the threat assessment team must be present and involved in the threat assessment process from start to finish, including the disposition decision.

**31.** Because it is impossible to include the information-rich local databases in the FSSP, it is imperative that local threat assessment teams establish processes to ensure that all relevant information is obtained so that information important to the threat assessment team’s decision-making process is not omitted. Law enforcement agencies should consider committing a dedicated analyst familiar with data gathering to conduct the research necessary for an effective threat assessment process.

### **SESIRs—Chapter 9/Page 118**

**32.** SESIR guidelines should be changed to eliminate confusion over what incidents require “consultation with law enforcement” versus incidents that are required to be “reported to” law enforcement. Any required action should be tracked and reported so that compliance can be measured. If there is required “consultation” with law enforcement then that should be documented and reported. If an incident is required to be “reported” to law enforcement, then whether an official report was generated by the officer should be documented. Officer discretion is important, so this is not a recommendation to mandate that officers take action, only that if they are required to be told under SESIR that the result be reported.

**33.** To ensure proper reporting, SESIR guidelines should require the gathering and reporting of law enforcement data including the date and time of law enforcement notification and name of the law enforcement officer who was notified. If a case/report/incident number is generated, that should be included in the data gathered through SESIR reporting.

**34.** The two groups of SESIR data which “are expected to include consultation with law enforcement” (21) and those which “may not need to include consultation with law enforcement” (5) require clearer direction to school faculty. The category that includes the 21 more severe incidents should direct that staff “will notify law enforcement” and that the less severe incidents “may not need to include notification to law enforcement.”

**35.** As currently defined within SESIR, acts of violence against another could be classified as either a battery, physical attack or fighting. These categories should be consolidated to two

categories which closely mirror the criminal definitions of battery and aggravated battery. Both of these categories should fall under the category that mandates staff to notify law enforcement.

### **Integrated Data and Social Media—Chapter 10/Page 128**

- 36.** To manage expectations and eliminate false expectations, threat assessment teams need to be educated to understand the limitations of the FSSP and its capabilities.
- 37.** Agencies should consider a dedicated research component that supports the threat assessment teams to ensure comprehensive data is acquired and available to the team.
- 38.** The social media monitoring tool should be renamed to reflect that it is not “actively” monitoring social media.
- 39.** The social media search should allow the FSSP user to run keyword and username searches of the data.
- 40.** Require school districts to provide school nicknames (e.g. MSDHS) and other relevant information to enhance the social media tool.
- 41.** SESIR data quality and frequency needs to be improved if it is to be of value to FSSP users.
- 42.** Preparing for a threat assessment meeting should be a ground up process where agencies first collect the information they have locally accessible and then use the FSSP and other existing information sources to augment other available information.
- 43.** Threat assessment team members should each have a well-developed list of sources of information and data from their discipline (law enforcement, schools, and mental health) that should be prepared and reviewed for the threat assessment meeting. An example is the Pinellas County pilot, where such a list was created to ensure that all databases are checked and no relevant information overlooked during the assessment.
- 44.** Before any additional money is spent to consolidate data, time should be spent to evaluate how the process is working with the data currently available to the teams and the systems that have been put in place.

**45.** Further research is required to determine the best way to manage students who have been identified as threats. This includes what resources will be needed to manage them and how this management will be transferred when the student ages out of the school system.

#### **Juvenile Diversion—Chapter 11/Page 138**

**46.** The Commission supports most of DJJ’s recommendations as set forth in its July 1, 2019 report. However, as opposed to allowing independent school-based juvenile diversion programs, the Commission recommends that the legislature amend F.S. 1006.13 and prohibit schools from creating and/or operating any juvenile pre-arrest diversion program other than a program operated pursuant to F.S. 985.12. By requiring that school-based diversion program operate under and consistent with programs established under F.S. 985.12, continuity is ensured between State Attorney-led diversion programs and school programs.

**47.** DJJ should continue its efforts to provide easy and direct access to Prevention Web for all law enforcement officers and the legislature should support DJJ in its effort with necessary funding.

#### **Mental Health—Chapter 12/Page 151**

**48.** The legislature should consider additional mental health funding and require that entities receiving State funding report data-driven and outcome-based performance metrics establishing effective use of the State money.

**49.** The legislature should authorize State funding through which all mental health providers are required to participate in care coordination with other public and private providers, especially school-based providers. Expectations and performance measures should be established for all providers to ensure proper and necessary care coordination.

**50.** The legislature should require that school districts engage community mental health providers that receive state funding to participate in the coordination of student treatment plans and the elimination of multiple treatment plans between school and non-school providers.

**51.** The legislature should establish and require the implementation of master case management systems for high-utilizers of acute care statewide.

**52.** The legislature should require DCF, DJJ and AHCA to develop an alert system to identify those individuals who are repeatedly Baker Acted. The responsible entity must develop a course of action to address why the person is repeatedly Baker Acted.

**53.** The legislature should hold DCF and AHCA accountable to ensure outcome-driven results and require holistic responsibility for system recidivists, with a focus on timely access to care coordination and high-end utilization reduction.

**54.** The legislature should consider implementing juvenile mental health and wellbeing courts and provide judges with more progressive tools and consequences to better engage children in mental health treatment.

**55.** Programs, such as Community Action Treatment (CAT) teams, should be enhanced, and expanded where necessary, to provide better continuity of behavioral health services to close the gap when high-risk children transition into adulthood.

**56.** Schools should be required to implement evidence-based mental health and behavioral education designed to help youth develop empathy for others, learn how to make decisions, problem solve, resolve conflict, advocate for themselves in an appropriate way, develop self-esteem, and identify and handle their emotions. It should start with Pre-K and continue through 12th grade.

### **FERPA—Chapter 13/Page 162**

**57.** FDOE should prepare and present comprehensive FERPA and other privacy law training to all school district, school board and law enforcement legal counsel.

**58.** The legislature should require that Florida Safe School funding to be tied to the lawful real-time access to school security video by law enforcement agencies and the proper sharing of videos and photos by school districts with law enforcement. In order for a district to receive Safe School Funds the district must:

- have agreements that enable the law enforcement agencies that serve and respond to incidents on the campus with access to school video feeds, if the law enforcement agency has the desire and technological capacity to receive the video fee; and
- require their legal counsel and administrators attend FERPA training workshops developed by FDOE.